

DPI Submission

Preamble:

The DPI want a comprehensive public consultation of the Regional Forest Agreements. Yet the state and federal governments decided last year to extend the RFAs. This can only be for party political reasons as it was pre-determined before public consultation and without reference to proper independent scientific analysis of the effects of industrial logging under the terms of RFAs and other related (logging and environmental) guidelines.

The deceptive nature of the published DPI/EPA report not listing Forestry Corporation deficiencies in the thousands of published words plus the release just before the Christmas holiday season does the DPI no credit. I can understand why NCC and NPA boycotted the consultation process.

The lack of input by independent scientific sources is damning. The lack of information on native forest jobs and logging breaches is highly deceptive.

Background:

As a child I learnt about the cedar getters that exploited our forests. Cedar cannot be commercially logged now. It was exploited.

As a child I learnt about the whaling industry. Whales were hunted to the brink of extinction. They are not commercially hunted in Australia now. They were exploited. Now whales are the source of a sustainable nature based tourism.

In generations to come, people will shake their heads in wonder about the industrial logging of our native forests to feed the Eden chip mill and learn about the impacts it had environmentally.

When one takes notice of the proper environmental accounting of forest values from people like Professor David Lindenmeyer at ANU, then you can see that the **trees are worth more in the ground than they are felled.**

His work in Victoria's forests found that, per hectare, trees are worth over 70 times more for water and 12 times more for tourism than they are for wood products derived from logging.

Discussion:

The Agreement was broken by successive state governments demonstrated by:

- late and poorly constructed reviews by relevant departments,
- lack of proper resourcing of the EPA to monitor logging operations,

- lack of proper and independent scientific studies on the effects of industrial logging,
- the Eden chip mill never operating on the basis of forest waste.

Private land forestry is a real concern as the supervision of logging is by self-assessment by largely unskilled and profit focused land holders. The concern is that large amounts of native forests are in private tenure.

Plantations:

Judith Adjani in her book, *The Forest Wars*, outlines how much provision was made for pine plantations in earlier times and how that plantation estate can now service our general timber needs, especially with the modern day technology to veneer timbers for structural work.

Obligations under Paris Agreement:

The Lancet finds that the cheapest form of climate change mitigation is the retention of native forest vegetation. The increasing temperature and related rainfall risks have been maximised by the changes of land clearing laws in NSW and Queensland.

Endangered Species:

Extinction debt is a real consideration. The term relates to the dangers posed to endangered species and the time lag in seeing the effect of those impacts. (eg. Large cockatoos need large nesting hollows. Cockatoos live for scores of years. The effect of diminishing nest hollows might not be seen for decades.) This principle should guide all land management practices controlled by state government. We now have 1000 species listed on the threatened list in NSW.

The present state government is to be commended on whole of government policy on koala protection. How this translates into action is yet to be seen. When submissions are made (by organisations such as NCC, NPA & SERCA) to stop or minimise logging operations in areas previously recorded with koalas, logging goes ahead unabated.

Contractors have stated that they can see the canopy from their mechanical harvesters and that they watch for animals. Vision from drones demonstrates that in every case the metal lids are turned down during harvesting, presumably to cool the drivers, so there is no question that vision of the tree canopy is impaired.

The overall reduction in tree age by industrial logging

Jobs:

There are no longer work crews with chain saws on the ground. Coups are cleared at an astonishing rate by three workers in mechanical harvesters.

The Eden chip mill was once profitable due to high volumes. Now the Japanese have sold out. They can see the lack of a commercial future. Cheap, quick growing SE Asian hybrid-eucalypt plantation exports dominate the market. Top dollar in Japan is only paid to plantation material. My understanding is that Japan mills only accept plantation grown material. The Chinese market will accept native forest chips but at a fraction of the cost.

In the 'review' released by DPI, amongst the thousands of words, there was not one figure about the jobs in native forest logging. When we raised this concern at the 2018 Eden public 'consultation' meeting we were told by the DPI rep that they had the figures. The rep said that he would send them. Just now, a day before the deadline, those figures have not come through. Why weren't they in the documentation? Could it be that the DPI and industry reps want to show how few jobs there are now in native forest logging?

In the South Coast Road Map, it is claimed there are 1430 jobs which seems inflated. We know that Forestry in Bega employed 185 people in 2016, the Eden chip mill employs fewer than 45 people.

Native forest logging today really is just a government backed employment scheme. Great environmental degradation goes on to supply government subsidised cheap hardwood floor boards and pulp material. We, as taxpayers, pay for the degrading of our forests.

As has happened in the past, in the creation of Washpool National Park for instance, would it not be better to stop the drain on government funds to pay out contractors (with a binding non-restart agreement) and to provide training costs and employment in national park related management. There is good anecdotal evidence that workers would be more satisfied with the new work, despite the often repeated position that loggers would never retrain or find satisfaction in protecting the forests.

Questionable practices and mismanagement:

Past logging practices by FC have been questionable. Despite all the detailed logging plans carefully colour coded to show endangered species, rocky outcrops, stream beds, etc. the Land & Environment Court has made substantial findings against FC. Use of the word "cavalier" in the findings against FC in the Jarasius case in the 80s are a good indicator that there is a lack of proper on ground supervision and that state forests are managed for the benefit of contractors, who are still making good money while FC is desperate to make even a notional profit through ongoing workforce reduction (which compounds the lack of survey and supervision work) despite ongoing state subsidies costing taxpayers.

Waratah Gully logging of a site, globally acknowledged as having the highest global density of arboreal mammals was logged in the 80s. This showed

extreme arrogance and overconfidence in the abilities of FC to log and safeguard wildlife.

The overall effect of industrial logging is to produce a younger forest. Even when some habitat trees are left (often scarred by harvesting machines and left isolated and therefore vulnerable to wind forces), these trees will fall in later life and not have the next generation of hollow bearing trees available.

Lack of saw logs and overestimation of sawlogs is talked of openly in the industry. Leaked cabinet documents by the ABC in 2017 showing the desire within the industry and FC to have no pre-logging fauna surveys and to halve streambed reserves. This is of grave concern. If true, it shows again that the forests have been mismanaged.

This, plus a number of openly declared statements by industry and National Party representatives that in the southern region the industry is running out of sawlogs and there is an intention to log national parks post 2020. A number of us were incredulous when we heard it. But then the National Party policy is to de-gazette the Murray Valley National Park.

The ongoing 20 % reduction in National Park & Wildlife Service ranger positions over the last five or so years seems to be designed for failure. The state government scorns NPWS management. NPWS is continually criticised about bushfire despite Parks having a good record with fire management despite the industry claims. I am a RFS volunteer as are a number of my environmentalist friends. We know what hazard reduction is. We take part in such operations. We know that bush burns, even when previously burnt. For example, in the case of the Canberra fires this century, forests had been given a hazard reduction burn and then burnt again in a bush fire before going up in the catastrophic Canberra that consumed vast native forest patches and pine plantations.

Is it true that in the Eurobodalla logging during 2017 under \$5 a tonne was paid in royalties? If so, that is outrageous and shows that we are giving away our valuable trees. Now FC is trying to make money out of firewood. It seems any use of trees is fine as long as it involves sawing.

Is it true that over the last three years FC has received \$5 million a year from extraction of non-timber material (eg. gravel, rock)? Has that been properly declared.

This all points to the last gasps of a dying 'industry'. If it was a proper industry it would pay for its inputs, whereas now it just takes and exploits.

If it was a proper industry it would be truly running on a sustainable basis. The Auditor-General a number of times has found that trees have been felled faster

than they are growing. There have been doubts for decades that the forests that are regrowing are not the same types of forests that existed pre-logging. Valuable slow growing species such as woollybutt, ironbark and greybox are not replaced in their proper proportions. Woollybutt (*Euc. Longifolia*) is a key koala feed tree.

Whole trees are removed for roading and log dumps pulled up by the roots. These areas, compacted by heavy machines are slow to regrow.

One of the key requirements of the RFAs is that all available information be taken into account in any decision to renew them and it seems obvious that efforts have been made to deliberately avoid inclusion of controversial information in the deliberations on renewal. This is amply evidenced in the totally inadequate *Report of Progress with Implementation of NSW Regional Forest Agreements: Second & Third five-yearly reviews July 2004 – June 2014* where even information regarding over 4,000 breaches of environmental protection and threatened species licences by NSW Forestry over the 10 years of the review have been deliberately and callously omitted. Even details of court actions taken by EPA against NSW Forestry have also been left out of the reviews. Considering that these breaches were gained from only 187 audits of between 5,000 and 6,000 native forestry operations, one can only imagine the full extent of these breaches over the whole state. It should also be noted that the number of breaches hasn't decreased over the 10 years of the 2nd and 3rd five-yearly reviews.

Recommendations:

Clearly, commercially and environmentally, the trees are worth more in the ground.

To protect our natural heritage and to provide more sustainable regional employment it is strongly recommended that **all native forest logging be terminated. The Regional Forest Agreements should not be renewed.**

Alternative activities with real commercial credibility and environmental benefits such as NPA's Forests For All proposal or the Great Southern Forest and Great Koala National Park have much more to offer the wider community and the people of NSW.