

Submission on Renewal of Regional Forest Agreements Eden and Southern Regions of NSW

Submission By : Vincent Phillips PO Box 8008 Wolumla NSW 2550.

Personal Background : Employee Duncans Sawmill Eden 1984 -- 1994
Employee Eden Chipmill 1995 – 2012.
Now Retired.
Industry representative on Eden RFA process.

Over the past 34 years I have maintained a close interest in all aspects of the forest industries in the Eden and South Coast regions and during my employment served terms on the Boards of both NAFI and the NSW Forest Products Association.

I would like to see the RFA structures and intent continued and wish to make the following submission in support of both renewal and improvement of the current forest agreement processes.

Summary

When interest groups criticise the RFA outcomes and impacts in the Eden and Southern regions of NSW they often need to bury some of the key outcomes. Perhaps the most telling of these is the fact that post RFA some 90% of the public native forest estate in NSW and Victoria is unavailable for commercial use such as logging.

One of the current claims (SERCA Inc. 2018) is “Most forest national parks promised during RFA negotiations have not eventuated”. My recollection is that in fact the promised Parks in our region were all formally declared and legislated. One of the first tasks in the renewal process should be to ensure that the general community is not blindsided by chronic misinformation.

The renewal of RFA,s should reflect that fact that there is no real reason why a forest industry cannot exist in a part of the native forest estate. Our native eucalypt forests are a dynamic natural resource. Events of the first RFA period have demonstrated very graphically how difficult it is to turn dynamic systems into a form of museum.

The wildfires of 2003/2007 were the largest in Australia in the past 150 years. They severely impacted the alpine and sub alpine forest estate from Canberra almost to Melbourne. They burned some 3 million ha. mostly in older forests because that's where the lightning storms struck. Ecological damage was massive. National Parks were not spared – some of our biggest and best were decimated. An RFA has to look beyond production forests and consider all tenures and management regimes.

It is common opinion that climate change will bring more wild weather and more lightning storms. Government policy is going to have to step up in natural resource management. Carbon emissions in climax wildfires are way above most other sources. Reality says that carbon storage in dynamic eucalypt systems cannot be legislated. Those systems will have their real impacts and timing decided largely by natural forces and events. Mismanagement can occur anywhere. Difficult challenges like forest fuel levels are key threatening processes in real world outcomes. Access and first response are critical to ecosystem protection against natural threats.

Sustaining forest based industry is more difficult now than it was in the past. The current RFA approach has been to deliver the Parks but quite heavily restrict supply outcomes in what were supposed to be the wood supply zones. Moratoria and a host of restrictions have greatly reduced resource access. Some of these may well be fully justified on balance but the initial RFA structure lacked any flexibility to accommodate ongoing change. There needs to be some form of land swap arrangement to allow for additional areas of conservation reserve allied to the release of areas of low conservation status back into State Forest to maintain wood supply.

The RFA needs to inform

Misinformation remains an everyday issue in forest management and public perception. The first Eden RFA was based around 72 forest types/communities and sets of scientifically derived conservation targets. The renewal process needs to reissue those tables and refresh the community about outcomes v targets and provide appropriate comment on those ecological communities that are no longer part of the landscape of today and where targets can not be physically achieved.

The current proposal titled Great Southern Forest edited by Judith Ajani seeks to add all of the unreserved public forest (432,757ha.) in the Eden and Southern regions to the reserve system. That report (page3, para3) tells the public that “the 432,757ha. is one third of NSW entire public forest estate.” Government publications list the NSW public native forest estate at around 7.5 million ha. Someone got it wrong.

Public documents show that in NSW the National Parks & Wildlife (NPWS) administer around 5.58million ha of native forested land and Forestry NSW around 1.8 million ha of native forest with half of that Forestry NSW area unavailable for timber production so effectively a further conservation reserve.

I guess the bottom line for some green groups is that when you want 100% then 90% is never going to be enough. The general community may see it a little differently given a broad appreciation of the facts. 90% is a big number. Very big.

The debate about the profitability of Forestry NSW in terms of their native forest operations is another where no reasonable comparison is drawn. The NPWS on the latest figures available to me drew \$278 million from the public purse over and above their own revenues for the year. They would seem to get around \$35/ha for native forest reserve management. If you notionally allocate \$35/ha to Forestry NSW for the 900,000 ha of native forest they manage as a reserve their economic result improves considerably. Forestry NSW manages that part largely out of timber income.

Carbon Issues

Interest groups such as the NSW National Parks Association write off the value of the current RFA regime because it never accounted for forest carbon. In real terms no group or forest policy mechanism can ever hope to impose guaranteed outcomes in respect to forest carbon. Quite feasibly placing all forest in a reserve system could turn out to deliver a worst case loss of forest carbon.

Natural events such as wildfire have invaded the first RFA outcomes on a massive scale in south eastern Australia and under predicted climate change outcomes are likely to continue to do so. We can influence but not dictate outcomes.

Publications such as *The Facts about the Fires* (Dexter et al. 2005) and *Ashes to Ashes* (D. Bowman / B. Murphy) detail the scale of landscape and ecological damage from the massive fires of 2003/2007 that ravaged the forested alpine areas.

Bowman and Murphy looked in depth on effects on the 356,000 ha of alpine ash forests burned in the fires which in total have extended across around 3 million ha during the first RFA period.

They found that there was an estimated loss of 36 million tonnes of Carbon (132 million T of CO₂) from just the alpine ash sub region. Clearly the total emissions across 3 million ha were many times that figure.

To try to isolate native forest issues down to carbon protection is and will be a futile exercise with no predictable outcome. The 2003/2007 events demonstrated that all forest age classes can be equally affected across virtually all the elevation and aspect ranges. Lightning storms - the ultimate management challenge - don't pick winners.

The forest industry is dealing with a resource that in the native forest contains on average around 28% carbon in the standing resource. It is a renewable resource living in a dynamic system subject to random and man made impacts. Wood is very different to the other major carbon based resources such as coal, steel and alumina. Future generations will always have wood fibre. Technology will dictate its use.

Finding a Workable Balance

Given the 90% public native forest unavailable for timber harvesting the renewed RFA's need to strike a new model that delivers equity in a timber supply sense when further forest is withdrawn to be added to either formal or informal reserves.

The Murrah/Mumbulla additions are an example. These have been added to the reserve system and there needs to be an offset from that part of the reserve estate where conservation targets have been met at well above the set levels. The RFA tables show a number of forest types where this is the case. In the original negotiations industry asked for a wood reserve area to be gazetted to allow for land swap type outcomes but this was refused. It needs to be a feature of a fully developed new RFA.

Opponents will vigorously reject this suggestion but they have been instrumental in demonstrating that areas of low conservation value exist across the local native forest estate. A Wilderness Society/Forest Rescue 24/7 occupation of a logging operation in Wandella State Forest over a period of 200 consecutive days failed to identify wildlife or high conservation type impacts. There are many areas of similar forest condition within the reserve system that can be utilised as offset resource.

As no logging can occur in National Parks appropriate examples of these areas need to be reclassified as State Forest as timber reserve offsets.

The sawmilling sector is likely to be the principal benefactor from such an arrangement. The native forest is their only supply source where the chipmill have other sources such as their own plantations, plantations owned by others and sawmill residue chips to supplement native forest supply based mainly around thinnings.

Again in the original RFA negotiation the sawmilling sector was encouraged by advice that they were likely to be able to obtain high quality resource on a selective basis from informal reserves such as filter strips. This has never been followed through on and needs to be revisited as it is a potentially vital source of high quality sawlog for drying and dressing at Eden. The logical market for offcut in such an operation would be firewood as the specie/size spec would not meet pulpwood spec in most cases. This proposal is subject to economic analysis in terms of extraction cost and access but can be designed as low overall impact harvesting.

So what has happened in the Reserves

While we still hear about State Forests publicly little is heard about the forest reserve system. I would expect that over the 18 years of the Eden RFA there has been extensive ground truthing of the modelling based reserves that were designed in 1997. It would be of great interest to the community to know the results.

What are the economic outcomes relative to tourism – they are regularly touted but what are they in the local context? Water quality on the far south coast of NSW is rated with Australia's best on a regular basis so the forests seem to be a constructive contributor there. The doom and gloom scenario is at odds with reality on the far south coast of NSW. Despite high levels of logging a healthy environment prevails.

Some form of detailed update would be a useful community tool.

Economy and Employment

Rural areas continue to rely on a mix of industries to underpin investment and employment outcomes. While much reduced in size the native forest industry continues to make a significant contribution. The Blueridge mill is the largest individual employer in Eden. The Boral mills in Narooma and Nowra, the Eden chipmill, smaller sawmills and the harvest/haulage sector along with Forestry NSW provide direct investment and employment across the NSW south coast. Other entities feed off them.

There remains further untapped opportunity for firewood collection and sale in a climate where renewable resource should always have a call over the fossil fuelled air con systems that dominate modern society.

Other Issues

In general terms the funding for new ventures (ERAP) that accompanied the big increases in forest reserves in the Eden region has not managed to underpin sizeable long term ventures. The largest investment in a commercial bakery in Eden failed. The largest and most durable new investment was the Blueridge sawmill in Eden which still employs 50 direct and underpins the employment of many others.

In Conclusion

Regional Forest Agreements can be strengthened in structure to better serve the competing demands of forest based policy and improve community understanding. Effective outcomes are not always easy. The best policy framework will be effective across the board and will require political will and the ability to factor in real world outcomes. Forests need policy that can recognise their dynamic nature.