

## **RFA reviews/remake 2018 – Submission from Prof. Don White**

The NSW and Federal Governments have already pre-empted the outcome of the so-called RFA reviews. So-called because they are many years late and have not yet been made public and been through the process of public comment and independent analysis.

I am aware that both Governments wish to have RFAs that are indefinite (“evergreen”), with less regulation, less reporting requirements and less oversight.

Neither Government has shown any interest in determining which aspects of the Comprehensive, Adequate and Representative Reserve System remain outstanding; whether Ecologically Sustainable Forest Management has been practised; and what has been the impact of the current RFAs on carbon and timber stocks, threatened species, water supplies and jobs.

I am only interested in comprehensive, scientifically based conservation and economic assessments of the effectiveness of the RFAs. Note - For example the framework and conservation assessments that contributed to the Tasmanian Independent Verification Group process, revealed a huge amount of new data relevant to the conservation needs in Tasmanian forests and justified the protection of an additional 570,000ha of forest.

The Commonwealth Government is a signatory to the Paris Agreement on Climate Change and has pledged to reduce Australia's emissions. It also commits us to protect ecosystems and biodiversity as 'Mother Earth'. The forest assessments on which the RFAs were based did not consider the climate implications of logging, but this certainly needs to happen now. Similarly, there was almost no consideration of the long-term impacts on water yield that would result from converting significant areas of catchments to thirsty regrowth, and what this might mean as rainfall and temperature patterns change. Assessing the best climate outcome (pathways to immediately reduce emissions and restore resilient long term carbon stocks) is a key new question that any new RFA should address.

Meanwhile in NSW, more species and ecological communities are being listed as threatened. Some like the Greater Glider, an exclusively forest-dwelling animal, have gone from being common 20 years ago, to nationally threatened. The Koala populations around the State, including their north coast stronghold, are in serious decline, with tens of thousands of hectares of high- quality koala habitat intensively logged under the RFAs. In creating the Murrumbidgee Flora Reserve, the NSW Government acknowledged that logging was harming koalas and hollow-dependent wildlife, and they would be better off if logging stopped. This applies to numerous species across the entire public forest estate.

Regional job patterns have changed, many former 'timber towns' no longer have sawmills, and are thriving. Jobs in the native forest logging and processing sector have significantly declined, mainly due to mechanisation.

I am of the view that the deck is stacked against forest conservation, and the principles of intergenerational equity and the precautionary principle.

The NSW RFA remake/renewal process in 2018 should be:

- A consultation process that is genuinely effective and inclusive and criteria set up in advance to benchmark and monitor the process on these criteria.
- A formal negotiation process with balanced representation of interest groups, as was conducted in the 1990s. Even this failed to deliver a result which satisfied environmental, economic and legal access concerns.

Unless we have a fair, transparent, effective, inclusive and adequately funded process I do not believe the process has credibility, and is likely to be a greenwashing exercise designed to entrench unsustainable logging and appease vested interests.

### **What is required?**

- A commitment to undertaking the required studies to update and complete the data collected last time.
- A scientifically credible analysis of the impact of the first RFA on non-timber forest values.
- A copy of the Natural Resources Commission report on timber volumes and any current timber data, how it was derived etc. Also, the intended purposes for which the forests would be logged over the next 20 years.
- Free and timely sharing of all data and appropriate data and analytical support
- Credible science on the potential impacts of climate change on forests and the connected environmental values.
- A full socioeconomic assessment of all land-use options over the next 20 years and beyond.
- Independent analysis of the potential to reduce GHG emissions associated with logging and of the carbon sequestration potential from allowing forests to recover their natural carbon stocks.
- A commitment to an adequate budget to cover the above (~\$20 M?).
- A commitment that no pre-emptive decisions ie no new wood contracts before the end of the process.
- No assumptions or commitments to outcomes prior to the scientific analysis above being completed.

### **Points**

**The RFAs are bad for forests**

- Almost 20 years after the RFAs were signed, there is extensive evidence that the RFAs have failed to facilitate Ecologically Sustainable Forest Management; failed to result in an economically sound timber industry; and the CAR reserve network of forest ecosystems has not been delivered. RFAs are therefore a failed model for forest management and should not be renewed.
- EPBC accreditation of logging operations has resulted in lower protection for forest species, and has not been complied with, as demonstrated by the multitude of license breaches<sup>1</sup>. See “If a Tree Falls - a study by EDO and NCC in 2011.
- Commonwealth oversight of forest management must be restored.
- The review’s progress report frequently addresses indicators without providing any data. For example, no spatial data is provided to assess the change in forest growth stage over the life of the RFAs, no data is provided to assess the proportion of each forest ecosystem protected or impacts on species and no data is provided on the value of forest-based services.
- The number of threatened forest species has continued to rise during the RFAs, with iconic species like koalas and gliders now either absent or experiencing population crashes in many parts of NSW. Logging is identified as a key threat to many forest species, often because of the impact logging has on key habitat features like hollow-bearing trees.<sup>2</sup>
- Logging kills forest animals<sup>3</sup> and is therefore an important animal welfare issue.
- Climate change was not considered as part of the RFAs, but is now the largest social, economic and environmental challenge we face. It is reckless to continue logging when we know it reduces carbon stores of forests.<sup>4</sup>
- The RFAs removed public oversight of logging by excluding ‘third parties’ from taking legal action on logging breaches. This has resulted in a lack of accountability and transparency in their implementation and has favoured industry over the public interest.

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<sup>1</sup> If A Tree Falls - Compliance Failures In The Public Forests Of New South Wales - prepared by the Environmental Defender’s Office (NSW), on behalf of the Nature Conservation Council of NSW. 2011

<sup>2</sup> <http://www.environment.nsw.gov.au/determinations/lossofhollowtreestp.htm>

<sup>3</sup> Studies on the Arboreal Marsupial Fauna of Eucalypt Forests Being Harvested for Wood Pulp at Eden, N.s.w. Iii. Relationships Between Faunal Densities, Eucalypt Occurrence and Foliage Nutrients, and Soil Parent Materials. LW Braithwaite, J Turner and J Kelly. *Australian Wildlife Research* 11(1) 41 - 48 Published: 1984

<sup>4</sup> Under What Circumstances Do Wood Products from Native Forests Benefit Climate Change Mitigation? Heather Keith , David Lindenmayer, Andrew Macintosh, Brendan Mackey Published: October 5, 2015

## Jobs and the economy

- The NSW taxpayer has paid millions of dollars to multi-national corporations to buy-back non-existent timber because of over-estimated timber volumes by Forestry Corporation. This is one of a series of subsidies that the logging industry receives.
- The logging industry is one of the most mechanised and most dangerous. The number of direct jobs in the industry has steadily declined and is now estimated as under 400 across NSW.

## Alternative options for public native forests

- We have other options besides logging. NPA's *Forests For All* plan is proposing that we protect public native forests and use them to increase public access for health and economic benefits. NPA's Great Koala National Park proposal is designed to protect the world's favourite animal.
- There are many forested areas in the three RFA regions that should be protected in the reserve network. For example, the forests of northern NSW are one of just 36 global Biodiversity Hotspots,<sup>5</sup> there are forested areas across NSW that should be World Heritage, and there are outstanding wilderness<sup>6</sup> additions.
- We know that the value of carbon, water and tourism from forests is much greater<sup>7</sup> than timber, and that protected areas are important for the economy. The Government must assess these trade-offs as part of a genuine review.
- There is large public support to protect forests. Polling conducted in the north coast electorates of Ballina and Lismore in December 2017 showed that 90% of people support protecting forests for nature, water, carbon and recreation. Under 10% supported logging for timber, woodchips and biomass burning.

## The consultation process

- The NSW Government has already committed to extending the RFAs. This commitment was made prior to the review that is now being conducted, so this consultation cannot be regarded as genuine. The review should be collating evidence to assess the performance of the RFAs with a view to making an evidence-based decision assessing whether they are an appropriate model for forest management.

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<sup>5</sup> <https://theconversation.com/forests-of-eastern-australia-are-the-worlds-newest-biodiversity-hotspot-3935>

<sup>6</sup> <https://www.colongwilderness.org.au/archive/RedIndex/NSW/redindexnswact.htm>

<sup>7</sup> Experimental Ecosystem Accounts for the Central Highlands of Victoria

- The consultation process is entirely inadequate as the outcome appears to be predetermined. The RFAs affect two million hectares of public property in NSW, and very few people under the age of 30 are likely to have heard of RFAs. A concerted effort must be made to have genuine community consultation on the future of public native forests.
- The reviews are so late as to make them meaningless. Both the 10 and 15-year reviews are taking place right now, at the same time! And the information from this is not available for the review process.
- The entire rationale of the reviews – that the community can have confidence in the RFAs because of a transparent and timely review – has been seriously undermined.
- To be effective, the independent reviewer must consult independent scientists (not just government agencies) and must undertake on-ground inspections of logging impacts with community groups.

## Summary

1. **The RFAs must not be renewed.** The RFAs have failed to protect the environment, failed to result in a thriving timber industry and are driving climate change. The RFAs are therefore a failed model for forest management.
2. **This public asset must be managed for the public good.** Logging is robbing future generations. The progress report for the RFA review fails to provide any data to support the assertions that logging is conforming to ESFM. In contrast, there is lots of evidence that forest wildlife is in decline, we know logging reduces carbon stores and water supplies and we know the majority of people support protecting forests.
3. **We can implement alternative models for forest management.** We can do better than industrially logging diverse, living ecosystems. National Parks Association of NSW's (NPA) Forests For All<sup>8</sup> plan seeks to protect forests to facilitate increased human access for health and wellbeing, recreation and education. The Great Koala National Park<sup>9</sup> proposal would help protect koalas and become a huge tourist attraction.
4. **Other values of forests must be considered.** Research in the Victorian Central Highlands shows that the value of water, carbon and tourism dwarf that of timber.<sup>10</sup> Our Governments must consider all economic and social benefits from forests.

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<sup>8</sup> [https://npansw.org/wp-content/uploads/2016/10/forestsforall\\_maindoc\\_july17.pdf](https://npansw.org/wp-content/uploads/2016/10/forestsforall_maindoc_july17.pdf)

<sup>9</sup> <https://npansw.org/what-we-do/our-work/campaigns/great-koala-national-park/>

<sup>10</sup> Experimental Ecosystem Accounts for the Central Highlands of Victoria Heather Keith, Michael Vardon, John Stein, Janet Stein and David Lindenmayer 16 June 2016

- 5. The Government should use the end of the RFAs as the point at which it implements a just transition out of native forest logging on public land.**

Prof. Don White

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