



19 August 2013

Project Officer  
Office of the Director  
Sustainable Forest Management  
Department of Parks and Wildlife  
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Bentley Delivery Centre WA 6983

Dear Sir/Madam

*SUBMISSION ON A REPORT ON PROGRESS AND IMPLEMENTATION OF THE REGIONAL  
FOREST AGREEMENT FOR THE SOUTH-WEST FOREST REGION OF WESTERN AUSTRALIA*

Thank you for the opportunity to comment on the above report. Leeuwin Environment (formerly the Leeuwin Conservation Group) has been involved in forest issues for more than thirty years, and has submitted on and/or played a role in all major forest policy changes during that period. However, we've not thought it all that valuable to assess how the Regional Forest Agreement has unfolded over the years so can't meaningfully comment on its implementation. Nor do we think it matters much what commitments have been met, because in our opinion the Agreement was the outcome of a flawed process, and could only result in harm being done to WA's native forests.

We think the RFA can be summed up as a political fix masquerading as a forests cure-all. Steered from the start by pro-industry bureaucrats, much of the data it was found on was dubious or wrong, and its assumptions have been proven incorrect. The native forest industry in WA has continued to decline and run at an ever increasing cost to the public, and forest ecosystems to be systematically and irreversibly damaged by logging. Despite incontrovertible evidence and the best scientific opinion, none of this has ever been admitted to by government, which has preferred to hide behind its discredited in-house monitoring results and propaganda.

Flaws in the governance and efficacy of the process pointed out by scientists and others at the time were simply ignored. Deficiencies were abundant and at times bizarre. For instance, our involvement included a field inspection of disputed old growth forest in the Margaret River – Nannup region which the RFA had reviewed to find 150 ha of OGF (it found none the first time) and we estimated the true figure to be over 20,000 ha, more than a third of which was uncut.

This region is one of the hardest hit by logging. In the ten years to 2000 about 10,000 ha of the approximately 330,000 ha then in state forest (most already logged at least once) was being cut each year, giving a rotation of 33years! The small RFA reduction in cut was too little too late, and the result (of logging and the mandatory post-logging hot burns) is a severely damaged landscape with most of the irreplaceable old trees gone. It's a disgrace, but now the area is again being targeted for its remnants.

Regardless, the Agreement has failed in its aims because it was delusive. The reserve system was inadequate for the stated purposes, the Ecologically Sustainable Forest Management destructive, and the intention of stabilising forest based industries flew in the face of historical decline which was bound to continue as the resource dwindled.

Advances in forest protection have occurred *despite* the RFA, with significant gains coming from the 2001 Labor Government initiatives (after immense community protest) and some constraint being put on state exuberance by the Commonwealth's EPBC Act. Unfortunately, as the state auditor found, the 2004 clearing amendments made little difference to the amount being cleared; logging was anyway exempt.

The period of the RFA has seen listed threatened fauna species on its watch rise from 12 to 26, and threatened flora species from 57 to 87. These increases may have happened anyway, but adverse RFA policies must have contributed. Similarly the RFA can't be entirely blamed, except for its institutional blindness, for the significant and increasing decline (associated with climate change) of all main species of native tree in the SW. But again, its policies haven't helped.

Under the RFA the largest miller in WA, Gunns, folded, and public subsidy of the native forest industry grew to record levels as the FPC fiddled reports to make it look otherwise.

In light of all this, analysis of how many steps of the process have been achieved seems beside the point – like reporting about the seating arrangement on the deck of a sinking ship. The tragedy for communities and visitors, and the unique and increasingly at risk fauna and flora, is that the state's Forest Management Plans dovetail into the fallacious assumptions of the RFA. The new FMP appears set to endorse the same harmful practices when transfer to plantations is an obvious way to meet environmental and industry concerns. But sadly, the commercial ethos that infuses government is too thick for the environmental alarm bells to penetrate. Recreational, habitat and carbon sink values are disregarded as destruction continues with the usual tremendous waste.

Two months ago more than thirty scientists knowledgeable about WA's South West forest ecosystems signed a public statement calling for protective measures to be incorporated into the new FMP. Their recommendations were underpinned by their informed assessment of logging's legacy viz. reduction of critical habitat, spread of disease, fragmented ecosystems, disturbed soils, reduced water quality, and released carbon. The state's leading scientists in the field deserve better than to be ignored.

Despite (or perhaps illustrated by) the progress report's long-winded commendation, the RFA remains a shameful exercise which has neither set industry on a sustainable footing nor protected WA's unique and declining forests and wildlife.

Sincerely

Rod Whittle  
Secretary