



Coastwatchers

Eurobodalla's environment group

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Resource and Conservation Unit
Department of Environment and Climate Change NSW
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Submission on the Draft Report on Progress with Implementation of the New South Wales Regional Forest Agreements (RFAs) May 2009

The opportunity to comment on the implementation of the NSW RFAs is appreciated. The base for the Coastwatchers Association is the south coast of NSW, which is blessed with extensive public and private forested lands.

We take a firm stand on environmental protection of the native forest estate and are deeply concerned that the cumulative impacts of degradation of our forests from industrial logging are destroying their carbon carrying capacity, reducing water quality and flow and exacerbating extinction rates of forest dwelling species.

The submission concentrates on south east NSW and in particular the Southern RFA. It is presented under the headings set out in Chapter 1 Executive summary.

1.2. Purpose of the review

Opportunity for public comment

Limiting opportunity for public comment on the performance of the RFAs to the five year reviews is unsatisfactory. Our members regularly witness the consequences of logging our local public forests but have no ongoing opportunity for providing input into the activities of Forests NSW in the region.

1.4. Key progress of milestones

The Regional Forest Agreement for Southern 2001 states that “...within each five year period, a review of the performance of the Agreement will be undertaken,” and “...the mechanism for the review is to be determined by both parties before the end of the five year period and the review will be completed within three months.”

The review period for the southern RFA is set down as April 2001 to June 2006. However the draft report of the review for this period is dated May 2009. Such tardiness does not inspire confidence that the performance assessment of these RFAs has any priority for either party to the agreement.

A tally of the 59 individual milestones in the report reveals that only about 30% have been completed, with 3 others not yet required. The rest are still to be completed. This again represents a dismal performance.

1.5. Results of monitoring – criteria and indicators

Biodiversity

Coastwatchers questions the claim that positive environmental outcomes are being achieved under the RFAs. The recent Senate Committee report on the operation of the Environment Protection and Biodiversity Conservation (EPBC) Act focussed on Regional Forest Agreements. The Committee found that there is a need to improve the transparency and accountability of forestry operations under RFAs and to better assess the implementation of environmental protection under them consistent with the objectives of the EPBC Act.

Coastwatchers believes that the continued exemption of forestry operations under the RFAs from the requirement for environmental approval under the EPBC Act must be subject to greater compliance with and enforcement of existing processes.

The NSW Scientific Committee made a determination in 2007 that “...the loss of hollow-bearing trees is a key threatening process”, and yet there has been no real government action to stop the ongoing loss of these trees during forestry operations. Local community members have reported a variety of breaches to DECC yet there has not been one prosecution for breaches of the Threatened Species Licence for the last five years in the Southern and Eden regions. The Department of Environment and Climate Change Forest Policy and Regulation Unit is severely understaffed, having only one person to police the whole of NSW. It has also been stated that there is a difficulty in making a determination on the suitability of trees selected for retention once the harvesting has occurred. This needs to be remedied immediately.

At the outset the community was given assurances by the government that: “... *agencies which currently have enforcement and compliance powers will continue to have those powers and continue to use them to ensure that the licences are adhered to.*” (Minister Yeadon). NSW Legislative Assembly Hansard, 12 November 1998, Since these powers are not being used we need default provisions to allow the Commonwealth to re-assert the EPBC Act where compliance is not enforced.

Productive capacity of forest ecosystems,

Forests NSW figures from 98/99 to 06/07 for the Southern region (which covers around 200,000 hectares) show that forest productivity (tonnes per hectare) has fallen substantially:

- The areas logged have increased significantly, especially in the last two years for which figures are available (2005-06 and 2006-07).
- However the output of large sawlogs has remained relatively constant.
- The period 2006-07 had the lowest yield in six years.
- The time period for the cutting cycle has fallen to less than 20 years.

Since the industry is having to log ever greater areas to maintain the same wood supply commitments, it would appear that unsustainable volumes of timber have been committed for the duration of the RFA.

A review of native forest yields with respect to sustainability was due in December 2006.

However, only now is a comprehensive review of sustainable yield for the South Coast, using improved FRAMES, underway. Coastwatchers is still waiting for the verdict expected to be completed by June 2009, but as of September 2009 it had not happened. The excessive lateness of such important data is a major concern especially as the recent NSW Auditor-General's report has cast doubt on the sustainability of forestry operations.

A major concern is the fact that the Southern and Eden RFAs failed to take account of the available plantation timber resource, even though it was first and foremost a timber supply agreement. Australia's existing plantations are now able to meet virtually all our wood needs, for both our domestic and export needs.¹

Forest ecosystem health

Forestry operations under the RFAs have caused cumulative degradation of our forest ecosystems. Turning multi-aged native forests into young regrowth is contrary to ecologically sustainable forest management (ESFM). Scientists advocate an approach based on maintenance of ecosystem structure and function to protect more species and enhance ecosystem resilience.²

Ecological sustainable management of native forests should be about ensuring the sustainability of forest biodiversity and ecological processes. These aims are not compatible with those of providing a sustainable timber supply which concentrates on ensuring supply of the required volume of timber on a long term basis.

For these reasons Coastwatchers does not agree that the major factor influencing the health and vitality of the forest ecosystem in the Southern region during the reporting period was fire.

Since the report details the area of forest that has been burned it is important to point out that FNWS employees themselves have been responsible for “unplanned” burning of large areas of forest when prescribed burns have got out of hand. The window of opportunity for prescribed burning in regenerating stands is relatively small. The prescription developed by the National Bushfire Research Unit (Cheney et al, 1992) seems to have been ignored in some instances, with spectacularly disastrous results. The most recent glaring example in our locale is the thousands of hectares burned out around Mt Gulaga in the last week.

Contribution to carbon cycles

The RFAs have failed to take account of the critical role for native forests in averting climate change. Scientific and public opinion is calling for deep, rapid cuts in emissions in order to avoid catastrophic climate change. The urgent need to address this problem must over-ride the needs of wood supply agreements.

Coastwatchers sees native forests as an important tool in the international fight against human induced climate. One of the most efficient and cost effective ways of reducing carbon emissions is to protect and restore native forests and natural ecosystems. Scientific evidence shows conclusively that native forests should not be disturbed by logging because of the gigatonnes of carbon they store and for the valuable role they play in sequestering carbon. A recent study by Australian National University (ANU) scientists shows that Australian forests are much more carbon rich than previously estimated.³ Research published in *Nature* also found that native forests are carbon sinks which continue to sequester carbon for up to 800 years.³ The sequestration potential of regrowth forests suggests that their management should be oriented towards the eventual restoration of their oldgrowth condition rather than wood fibre production.

Criticism of the ANU scientists’ work on the basis that it does not take into account the effects of wildfire is not accurate. Some of the highest carbon stores were found in forests that had clearly been subject to periodic wildfires in the past (Mackey et al page 28).

⁴Review of newspaper and television images of the recent catastrophic bushfires in Victoria shows that in many places, houses are burnt to the ground but nearby trees are still standing. The ground is bare of litter, the foliage and surface bark is gone from the trees but the trunks and large limbs are still there. No doubt most of the carbon is still securely stored in the trunks and root systems, and rapid regeneration of foliage through epicormic buds will re-sequester some of the CO₂ lost in the fire.

A greenhouse impact budget for the full cycle of logging and regeneration is needed for evaluation of current management practices.

Soil and water resources

The RFAs have also failed to take account of forested catchment protection. Flow duration of streams draining forest catchments is a critically important parameter in assessing how catchment values are impacted by forestry practices.

Intensively logged and regenerated native forests have been shown to produce less water as streamflow than the oldgrowth forest they replace.⁵ The fact that dense regrowth from intensive logging uses up about twice as much water as the oldgrowth it replaces in wet sclerophyll forest types shows that the policy of intensive “integrated harvesting” has been a serious mistake.

Additional impacts from climate change on water resources have the potential to jeopardise water supply to rural communities in south east NSW. The review must take into account the value of water lost from logging in the context of a dwindling resource.

Conclusion

Since the RFAs do not consider the critical issues of climate change or water supply they are inadequate instruments to determine forest management in south east NSW.

The legislative conditions on which the RFAs rely to deliver ‘ecologically sustainable management’, are inadequate, frequently breached and very poorly enforced. Timeframes and milestones have not been met and key elements of sustainability monitoring have been neglected.

It could be said that the RFAs have failed to deliver the intended environmental protection. Coastwatchers agrees with the statement in the Commonwealth National Forest Policy Statement (1992, p2) that ...*“Managing Australia’s forests in a sustainable manner calls for policies, by both governments and landowners, that can be adapted to accommodate change. Pressures for change may result from new information about forest ecology and community attitudes, new management strategies and techniques (such as those that incorporate land care and integrated management principles), and new commercial and non-commercial opportunities for forest use. These pressures may affect the forests themselves.”* (National Forest Policy Statement, Cmwlth 1992, p2.)

The 5 year RFA review should be an integral element of adaptive management for our forests with regards to ecological sustainability. This association believes that new information on carbon sequestration and a community desire to act on climate change means the time has come to develop new forestry policy objectives that protect native forests for their role in carbon capture, maintenance of water supply and protection of biodiversity in perpetuity.

Since the draft report states that the review process will not open up the RFA to renegotiation it would be appropriate to cancel these timber supply agreements for native forests and move to plantations for Australian wood requirements. Royalties in South East NSW are now less, in real terms than they were fifteen years ago and Forests NSW is making less in royalty revenue than it expends in managing woodchipping operations. There are significant economic, environmental and social benefits to support ending native forest logging and to ensure a swift transition of logging operations into the existing plantation estate.

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On behalf of the Secretary

¹ Ajani J., "Time for a Coherent Forest Policy - Finally" (2008) Centre for Policy Development, <http://cpd.org.au/article/time-coherent-forest-policy-finally>.

² Walker, B. 1995, 'Conserving biodiversity through ecosystem resilience' *Conservation Biology* 9(4): 747-752.

³ Mackey, B.G., Keith, H., Berry, S.L., Lindenmayer, D.A. (2008) Green Carbon: the role of natural forests carbon storage. Part 1, A green carbon account of Australia's south-eastern Eucalypt forest, and policy implications. ANU Press, Canberra. Accessed from http://epress.anu.edu.au/green_carbon/pdf/whole_book.pdf on 3.02.2009.

⁴ Luyssaert, S. (September 2008) Old-growth forests as global sinks. *Nature* 455, 213-215

⁵ Lane P N J and Mackay S M (2001) Streamflow response of mixed species eucalypt forests to patch cutting and thinning treatments. *Forest Ecology and Management*, 143, 131