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SUBMISSION ON DRAFT TERMS OF REFERENCE OF THE NSW FOREST AGREEMENTS AND INTERGRATED FORESTRY OPERATIONS APPROVALS FIVE YEAR REVIEW

The draft terms of reference for the five year review are so inadequate they have very little credibility at all. The terms are far too narrow considering the failures of the agreements and approvals to date and in regards to the latest scientific evidence on climate change, water resources and loss of biodiversity. The review must be a total reassessment of government forest policy. All aspects of the Agreements and Approvals need to be up for renegotiation with the latest science driving the process.

The terms of reference do not acknowledge the failure to undertake the reviews at the required 5 years and the failure to provide annual reports on the agreements and ESFM indicators and criteria. There have been many breaches of the agreements and approvals documented to date and many milestones have not been accomplished. It is obvious the current situation is not working and the only way forward is a completely open review process with an open brief and guided by science not industry.

The management of native forests determines if they are a major carbon polluter or a major carbon sink with the ability to sequester vast amounts of CO₂. Contrary to industry spin the native forest industry is a major greenhouse gas emitter in Australia, especially in the woodchip driven operations in the Eden and Southern Forest Agreement Regions. The 5 year review is an integral element of adaptive management for our forests with regards to ecological sustainability and was intended to put flexibility into the Agreements and Approvals allowing them to respond to problems as they arose or became apparent, thus the massive carbon emissions of forestry operations that were not considered originally must now be taken into account.

There have been major improvements in research regarding climate change science and the impact of native forest operations on carbon emissions in the 10 years since the agreements were signed. The most notable is the recent report Green Carbon-the role of natural forests in carbon storage by Professor Brendan Mackey from the ANU.

The report shows the great potential for carbon sequestration in our native forests. Logging of native forests is not only a net emitter, but forests under this type of management have 40 to 60% less carbon sequestered within them. If these forests were removed from timber production and allowed to realise their sequestration

potential it would be the equivalent of 24% of our 2005 Australian net greenhouse gas emissions every year for the next 100 years (Mackey *et al* 2008).

Climate change represents a threat to biodiversity which was not adequately addressed in the initial CRA process in light of the latest science. The present reserve system is inadequate to protect flora and fauna from the impacts of global warming.

The impacts from climate change on water resources will be great. Coupled with the already known impacts from logging it has the potential to severely affect future water supplies. The review must take into account the value of water lost from logging in the context of a dwindling resource due to climate change. The impact this will have on rural communities that rely on State Forest for their water needs to be assessed.

The recently listed KTP's for BMAD and the loss of hollow bearing trees also needs to be addressed in the review due to the negative impacts of forestry operations. BMAD in the coastal forests is increasing at an alarming rate, affecting the future health of these forests. An important cause of this is the changes in soil properties and soil chemistry after intensive logging operations as practiced in the Eden region, which seems to encourage Bell Minors and assists in the spread to the surrounding forest of BMAD.

The loss of hollow bearing trees is a recognised Key Threatening Process and is occurring in the intensive woodchip driven operations of the Eden region. Forests NSW say they do not clearfell but operate under a "modified shelterwood harvest system". The Resource Assessment Commission has stated that this system of logging is clearfelling. These operations are having a severe impact on threatened hollow dependant fauna.

The economics of the native forest industry also needs to be reviewed. Native forest operations in the Eden and Southern regions run at a loss and in fact subsidise the profits of the Eden woodchip mill. This has been the case since the beginning of the Eden chipmill and is a massively irresponsible action by government of a publicly owned resource. This is extremely poor resource management, even more so when if the price of a tonne of CO₂ was \$20 then the daily emissions from the industry would be worth \$1 million.

As stated already the terms of reference are totally inappropriate in view of the issues in this submission and need to be broadened to encompass these and no doubt other important issues from other submissions. The Forest Agreements state the Ministers are unfettered regarding the terms and extent of the review and subsequent amendments. The attempt to restrict the review in the draft terms must be rejected and any review with these conditions would be seen as a farce with no validity or credibility. It must be a broad, transparent and science based review and the terms of reference must reflect this.

Yours Sincerely,
Bridie McEntee,
For South East Region Conservation Alliance

References:

Mackey, B.G., Keith, H., Berry, S.L., Lindenmayer, D.B. 2008, *Green carbon: the role of natural forests in carbon storage*, ANU E Press, Canberra.