

SUBMISSION TO THE DEPARTMENT OF PRIMARY INDUSTRIES ON THE REGIONAL FOREST AGREEMENTS

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Photo 1: Logged Glenbog State Forest, 2016: photograph, the late Carolyn Green

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Photo 2: Habitat? Trees, Gnupa State Forest. BJS

FROM MY PERSPECTIVE

When moving to the far south coast of NSW ten years ago I was shocked to see how the State treats the public's natural native forests for the weak commodity of woodchips as permitted by the Regional Forest Agreements.

Rationalising government policy with environmental destruction brings the popular tenets, and spirit, of Paulo Friere (*Pedagogy of the Oppressed*) to the fore. The environment is 'the oppressed'. To that awareness is added passion and concern about what is happening in our forests, and a deep appreciation for those who have fought for their protection for decades, for researchers and scientists whose work strengthens our arguments and for supportive campaigning colleagues.

An environmental activist survives on the 'audacity of hope'. Pressure increases from the possibility that one's ability to influence a reader may or may not benefit the future of our public forests. It entails a moral and ethical responsibility yet acknowledgement of a humbling finite capacity which makes one feel powerless against the odds. But this essential truth inspires:

Our world is at a critical crossroad. Our very future and the existence of life depend upon us transcending our limitations by evolving solutions, which are at least one step above the thinking that created our problems. Dr Eugene Fernandez, 2014.

On the basis of this wise tenet, may I recommend to the Federal and State Governments the principles of the Great Southern Forest which accompany this submission on behalf of the Great Southern Forest Steering Group and Supporters, and the far south coast branch of the National Parks Association – the organisation from which the GSF originated.

Having my say

The DPI has invited me to have my say on the 'shape the future extended RFAs should take'. My say is: "I reject logging of native forests for woodchips. The shape the future of any RFAs should be based on principles of the Great Southern Forest for floral and faunal protection, carbon sequestration and climate mitigation, not further natural native forest destruction".

I genuinely acknowledge the Traditional Owners of the lands of the State Forests which are the subject of the Regional Forest Agreements. I also sincerely respect the contributions made by conservation colleagues whose knowledge and understanding of the workings of

the industry, and the anomalies of the laws and enactments which purport to protect the environment and permit the industry to function, are superior to my own.

Having had over 25 years' experience in higher education, it is second nature for me to identify obscure or ambiguous content, assumptive claims and procedural anomalies, hence my submission to the EPA: *Questioning application of procedural justice principles within the NSW Government's Regional Forest Agreement public submission process.*¹

Questioning credibility

DPI'S RFA PROMOTIONAL MATERIAL

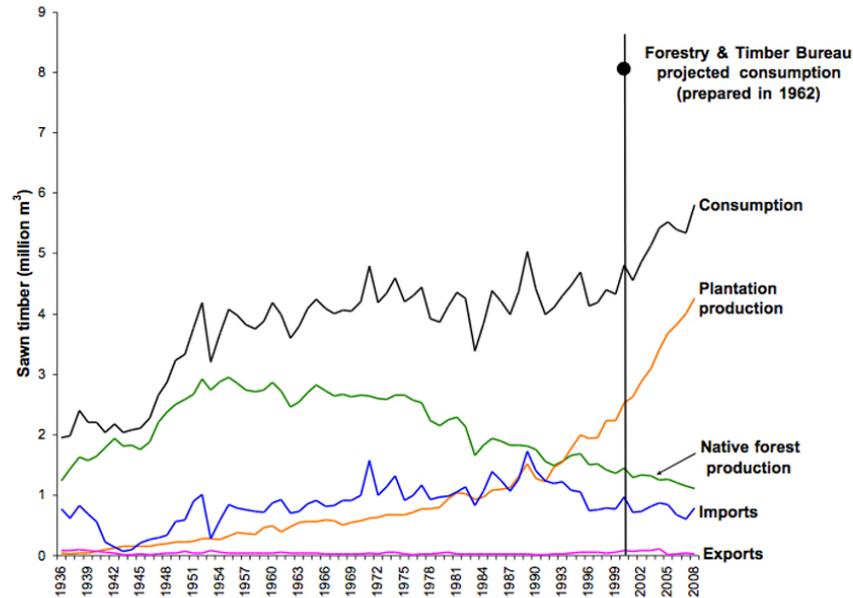
To begin with, the act of the Federal and NSW State Governments agreeing to renew the NSW RFAs within the public native forests for a further 20 years, occurred without public consultation, thus challenges the public's democratic right to be involved in decisions made about the forests they value, respect and own.

The comments which I make refer to the *Road Map*, and the two information pages: *Extending Regional Forest Agreement Overview and Renewing NSW Regional Forest Agreement.*

I understand that the *Road Map* forms the basis upon which the Regional Forest Agreements are to be reviewed. The Road Map and the South Coast Road Map raise red flags by neither including one mention of 'wildlife', 'protection', 'conservation', 'water', 'climate', nor 'soil'. These life-giving elements should be considered before any aspect of the environment is interfered with.

At times, it is unclear whether native forest hardwood or softwood plantations are being referred to and the treatment of both should be worlds apart. In the South Coast Road Map, 14,30 jobs are mentioned; whether that was over the past 100 years or for the future is unclear. We know that Forestry in Bega employed 185 people in 2016, the Eden chipmill employs fewer than 45 people, and the native forest industry employs only 0.1% of the workforce state wide² which is a far cry from what these Road Maps claim. Another claim is that "Australian demand for forestry products will be up by 43% by 2040" but according to the Graph 1 below, this may be from plantation production, not from native forest production which continues to fall and this would be an excellent time to end it completely.

a sensible approach to native forest management for beauty, canopy, culture, habitat, heritage, jobs, oxygen, soil, water, wildlife, climate mitigation and carbon sequestration



Graph 1: Changes in Australia's sawn timber industry: domestic market focus with plantations displacing native forests and imports. Judith Ajani 2014

The claim that “NSW native forestry sector industry value: \$465 million” of which \$75 million will be to the South Coast also seems unlikely, when The Australia Institute³ determined that native forest logging by Forestry Corp. generated losses of \$79 million over a recent seven-year period.

The overall assumption made by the Federal and State Governments that the public would approve of their decision to reinstate a system which has proven to be dysfunctional in terms of timely accountability, and economic and environmental sustainability, is illogical.

From the two information pages, the skeptical claim that these governments would “work closely with all parties in getting the balance right in the long term” is suspect, as a return to the ‘right environmental balance’ would be achieved by stopping logging native forests. By so saying, the DPI correctly acknowledges that treatment of our native forests is ‘out of balance’. In an attempt to achieve the ‘right balance’, creation of Murrah Flora Reserve demonstrates the beginning of an admission by the Governments that the southern region’s forests, their wildlife, water, soil, and carbon, need protection. Thus, it will remain on government ministers’ consciences that logging will continue to destroy koala (and all other) habitat until the practice ceases in the publicly owned native forests of NSW.

The stated ‘changes and improvements’ lock in: a) an automatic extension of the RFA if a five-yearly review is made and is deemed to have achieved a satisfactory outcome, b) promise of streamlined reporting and c) updating RFAs to reflect policies and legislation as and when required, etc., etc..

As I reflected on these two pages, why did I get the sense that I was being communicated with by a less than honest used car salesperson? It seemed as if 'our agreement is that we guarantee to check your car after five years and if we say that it checks out OK then it must be, so we will send you a guarantee certificate to say your car is OK, and we will make modifications to the agreement we've made with you about our dealings with your car if we think we need to'. Do you think it is a bit strange to assume the general public would give credit to that sort of 'agreement' and not think that the wool was being pulled over their eyes?

The past reporting and the future reviewing is taking place at the same time by two different government departments. Lay people who love forests and understand their need for protection may have difficulty critiquing government reports or dealing with the 429,733-word background reading material for the two stages of the review process.

The site you have indicated on the pamphlet where people can 'have their say':

<https://www.nsw.gov.au/improving-nsw/have-your-say/> is actually four clicks away from the actual feedback website: <https://www.dpi.nsw.gov.au/forestry/regional-framework/public-submissions>. This is disadvantageous to the technologically less competent members of the public who may get lost on the way to the right page. (Perhaps a pilot test would have shown where confusion lay with the whole process.)

Apart from reading scientific studies (some of which are referred to in this document) to gain an understanding of what is happening in our south east native forests, the empirical evidence speaks for itself. The failure of trees to regrow, the invasion of weeds post logging, the reduction of canopy, the loss of soil, the interference with natural water flow and catchments, the declining species rate, and the obvious logging breaches, is more compelling than any government report no matter how many government departments create it, no matter how many pretty pictures they publish, no matter how many decades of destruction they try to blanket, no matter how they massage the figures—native forest logging for woodchips is against the laws of nature; it is ugly, unhealthy, unsustainable, uneconomic and now, unnecessary.

Colleagues' opinions

"The RFAs are a failed experiment, there have only been 4 prosecutions in 20 years on the South Coast. This is despite massive environmental damage, and thousands of breaches of the law. The Forestry Corporation have consistently not met their deadlines, and failed to fulfil their requirements." ⁴

"So, what's wrong with logging? Aside from destroying the beautiful places we love to visit, that provide us with fresh air, cool our environment and generally just make us feel good to be alive, modern day logging is so non-selective and aggressive that it destroys the entire eco-system and infrastructure of where ever it occurs.

If our State Government signs up for another 20 years of mass destruction in our already decimated forests, it would be the biggest environmental mistake of our generation. It is draconian and unnecessary, in this day and age, to be tearing our forests down for timber. There are so many other options for timber and pulp production, all providing jobs for personnel employed within the timber industry.”⁵

Summary

Given the evidence of past performance in terms of reporting and the claim of supposed ‘sustainable forest management’ have proven to be dysfunctional, one cannot trust the incumbent corporation to manage our native forests honourably for another 20 years. I commend the decision makers to seriously consider the principles of the Great Southern Forest which follow, in order to reframe their thinking about forest management principles which have environmental integrity and promise for the future.

Why sacrifice...

BEAUTY

CANOPY

CARBON

CLIMATE

CULTURE

HABITAT

HERITAGE

NEW JOBS

OXYGEN

RESPECT

SOIL

WATER

WILDLIFE

...for this?



Photo 3: Eden woodchip pile

REFERENCES

- ¹ <http://www.serca.org.au/research/2018/ethics.pdf>
- ² Campbell, R. & McKeon, R. (2016) *Money doesn't grow on trees: the financial and economic losses of native forestry in NSW*, The Australia Institute, Discussion Paper, March 2016. <http://www.tai.org.au/content/money-doesnt-grow-trees>
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- ⁴ *Forestry Meetings are a Done Deal – citizens love for forests spurned*. South East Forest Rescue. 14.02.2018. <http://www.serca.org.au/submissions/2018/SEFR2.pdf>
- ⁵ *Native Forest Logging under the microscope and it doesn't look good*. The Dunns Creek Resident Action Group. 09.02.2018. <https://www.beagleweekly.com.au/single-post/2018/02/09/Native-Forest-Logging-under-the-microscope-and-it-doesnt-look-good>