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Feedback on Natural Resources Commission Draft Program Strategy for NSW Forest Monitoring and Improvement

General

The South East Region Conservation Alliance considers that the Natural Resources Commission is greatly underplaying the enormity of its task. The timing of this is also questionable, with RFA renewals signed just a few months ago. This should have been resolved *before* the renewals were signed.

NSW National Parks have been seriously under-resourced for many years and need major increases in funding to meet the objectives set for them and to deal with various threats from introduced animals and organisms, not to mention a changing climate.

Land clearance rates, including of forest areas in NSW, are at a record high. There are also clear signs of policy failure in regard to private forests.

The new RFA regime has no solid data base for its forest policies. The last comprehensive analysis was conducted before the first RFAs were signed. No such analysis was made before the new RFA regime was agreed between the NSW and Commonwealth Governments.

Given numerous commitments to ecologically sustainable forest management (ESFM) it is difficult to see how the NRC can embark on a monitoring program without adequate base data on the current state of the forests, on the impact of the previous logging rounds under the RFAs, and the capacity of the forests to recover their ability to store carbon, contribute to the water cycles, or provide for interests other than wood supply.

Government ministers and agencies refused to conduct a thoroughgoing review of the state of the forests, or to countenance ending the damaging logging regime of the previous RFA regime before putting the new RFA regime in place. The last serious review was made in the late 1990s. The forests of south east NSW are in a worse state than they were when the Eden RFA was concluded in 1999, and the South Coast/Southern RFA in 2001. Yields are now approximately half what they were, meaning even the wood supply cannot be maintained. The environmental and social impacts are largely ignored.

South coast forests

The forests of the south east of NSW have been the most heavily logged in NSW, mainly to supply the Eden export woodchip mill with logs. Logging has been most intensive in the Eden RFA area, but as supplies for the mill became more difficult to maintain, increasing inroads were made into the Southern RFA area.

In its paper on sustainable yields the Department of Primary Industries has confirmed that the Eden RFA area is close to completely regrowth forest, and that the intention is to complete that transition. How can this possibly be ecologically sustainable?

We are therefore requesting:

1. there should be no further logging in the Eden or Southern Region at least until it can be conclusively shown that the first RFA and earlier logging have no detrimental ecological impacts on flora or fauna.
2. that all the areas in the Eden RFA area that haven't been logged be identified as a priority, and be put into national park/reserve status, because it will be the last chance to protect species dependent on mature forest areas.

It is clear that National Parks do not adequately provide for a comprehensive, adequate and representative range of ecological communities and species. It was always the intention that forests available for wood supplies should complement the role of the National Parks - hence ESFM.

Regrowth forests are incapable of supporting many species. They are a long way below their carbon carrying capacity. They have lost vast amounts of soil in heavy rains, much of it silting up the regional water supplies. The lists of threatened and endangered species in the south east forests run to many pages. Drought, fire, and climate change have all taken their toll.

How can you possibly make vast areas of regrowth forests ecologically sustainable while maintaining intensive logging across the whole area? Yields estimated in the sustainable yields paper - approximately half what they were up till around 2013 - will require the same total areas of regrowth forest as before to be logged each year. The regrowth forest takes water needed by other activities and is more fire-prone. The logging is economically marginal, and even the industry admits it lacks a social licence. An early transition to plantations is very feasible.

Like the rest of Australia, NSW faces a climate crisis, an extinction crisis and a water crisis - all inter-related. Our distinctive native forests provide illustrations of all three crises, and new forest policies are intrinsic to their solutions.

The NRC claims to be an independent body. If it were truly independent it would be pointing out to the NSW Government the reality of the situation, and proposing new forest management based on principles of restoration and conservation. Fiddling at the margins of existing regimes in order to maintain wood supplies is not going to be a solution or help with adaptation to climate change.

Monitoring progress in a restoration regime would make sense. Monitoring further destruction under the new RFAs makes none.

Research and monitoring proposal

Forests of the Eden hinterland have experienced the most intensive woodchip driven logging in NSW and possibly Australia over 5 decades.

We are requesting:

- an area such as Yambulla State Forest be a suitable focus of research and monitoring which examines specifically the impacts of woodchipping.

This needs to be a genuine attempt to determine what are the impacts of logging in both the short term (animals killed as a direct consequence of the logging operation) and longer term (loss of habitat, hollows and so on). This is urgently needed.

One particular issue that needs serious attention is the increase in temperature that occurs in a neighbouring forest when an area is intensively logged¹. This has specific implications for forests subject to alternate coupe logging or for any forests logged where a “landscape” approach is applied. Yambulla would be a very suitable site for this monitoring.

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¹ <https://psmag.com/environment/deforestations-impacts-is-wider-than-it-appears?fbclid=IwAR3yBQGG5WaX-X25Xfrs1wAexUdy3xY8dFvC2XhSVGm299GycC91SWOblrk>