Personal Submission to the 10 and 15 year review of the NSW RFAs.

The RFAs sought to balance competing economic, social and environmental demands on forests by setting obligations and commitments for forest management that deliver:

- certainty of resource access and supply to industry building investment confidence
- •ecologically sustainable forest management ensuring forests are appropriately managed and regenerated
- •an expanded and permanent forest conservation estate to provide for the protection of Australia's unique forest biodiversity.

I feel that the RFAs, while well-intentioned have failed on all three counts.

A common misconception appears to be that the establishment of a permanent forest conservation estate was going to provide for the protection of Australia's unique forest biodiversity. The establishment of 'conservation reserves' by dedicating expanded areas as National Parks has gained popular political support without any demonstrable gains in biodiversity outcomes. At present, there are no indicators or metrics that validate the premise. While vast tracts of forested land have been captured in dedicated reserves, there has been no systematic, scientific assessment that validates that the reservation status is in fact delivering any improvements in conservation outcomes.

Quite the contrary. There is mounting evidence that the act of conserving forests in National Parks is leading to perverse environmental outcomes. There are two contributing factors. One is the lack of resources for management of these reserves, and the other is the capacity to maintain the landscape in a manner that is safe and for human habitation. The assumption is that these reserves can simply look after themselves. Were we to able to consult the pre-European custodians, (the indigenous communities that originally inhabited this country), we would find that they had learned that the way to keep the country safe and habitable, was to maintain a park-like landscape that was not prone to the kind of wildfire conflagrations that have prevailed with increasing frequency and ferocity over the past 150 years. This implies regular and frequent active management: a burning regime that will progressively transform the landscape from the crowded, fire-prone forests that dominate many areas today to a landscape that is less likely to be subjected to a landscape-changing event, due to the accumulation of excessive fuel loads.

This discourse is not aimed at bashing our National Parks management. In the absence of true government commitment, the agencies have done the best they can with ever-diminishing resources.

We need a tenure-blind, whole-of-landscape approach to forest management. Whether it be State Forests, National Parks, the various utilities or private property, all have a role to play in biodiversity conservation and management.

One of the failings has been the flawed presumption that if forests remain available for timber production, then biodiversity will suffer. Again, quite the contrary. In recent times, threatened species have been harvested from strong, vibrant populations in an actively managed forests so that

they could be re-introduced into National Parks where, for lack of fire for too long, they had become locally extinct.

The broader community is frequently peppered with misinformation that would have you believe that timber production (logging) is the sole cause of various landscape ailments. This is far from the truth. There are many issues confronting out forests, regardless of tenure. Vegetation thickening (due to lack of fire); weed invasion (due to lack of capacity to recognise a problem and take timely remedial action to prevent it getting worse); a species change (again due to lack of fire); forest illness such as the poorly-named bell miner associated dieback (again due to lack of fire) are but a few of the ailments confronting our forested landscape.

By contracting timber production to an ever-diminishing operational footprint, we have both intensified production beyond levels sustainable in the long term, and diminished confidence on the part of industry and communities for continuing investment and long term social security. In short, we have lost a lot of human capital at the local level.

The RFAs provide a framework to improve forest management; however the mechanisms to achieve sustainable forest management seem to be elusive to all parties. A hostile culture prevails between various government portfoilios, with the regulator on one hand frequently pursuing ill-conceived, pedantic prosecutions and the agencies responsible for management of parks and forests hamstrung by the requirements of their portfolios. No-one is winning.

A mature government would sit the respective ministers down and say, this is the outcome we want to achieve, now it's up to you to make it work. Less stick; more carrot.

The RFAs are premised on the concept of sustainable forest management. If sustainable forest management is a realistic and achievable outcome, then we have a moral and ethical responsibility to pursue it with vigour. It would therefore be far preferable to see areas that had been formerly gazetted as National Parks returned to timber production, where it could be demonstrated that such production would not diminish the opportunity for the full suite of biodiversity to continue to occupy the landscape and prevail in the long term. The presumption that making something a National Park offers any better conservation outcome to a well-managed production forest is simply flawed.

I strongly support the continuation of the RFAs, however I feel that as a nation we have a long way to go to bring the broader community to the awareness that our current approach to landscape management is putting many communities at an ever-increasing level of risk.

Our indigenous fore-bears knew how to keep Australia safe. We have a lot to learn.