Submission on Regional Forests Agreements –

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The following comments are purely my personal comments and do not reflect the professional position of any of the organisations that I work for or have had the honour of being associated with.

National Forest Policy Statement

The Regional Forests Agreements have their foundation in the National Forest Policy Statement of 1992 & 1995.

My understanding is the National Forest Policy Statement (NFPS) aims to balance the supposedly competing aims of forest conservation with the production of renewable wood products for domestic and export consumption. I mention supposedly competing, as I believe we can balance conservation with production but over the last 20 years there has been a tendency to reduce production to create more conservation areas and forest planning has been an either conservation or production decision.

Not enough effort or resources have been directed to integrating conservation and production and measuring and monitoring the results.

The introduction to the National Forest Policy Statement reinforces this view.

"In developing this Statement, the Commonwealth, State and Territory Governments have been mindful of the many values that Australia's forests have, of forests' role in the full suite of ecological processes that sustain life on this continent and their function as habitat for a diverse range of flora and fauna, and of the contribution that forest-based activities make to the national economy and regional and local employment (NFPS, p1).

I believe that the Vision for the NFPS embeds the dual goals of managing conservation with production and in a forward thinking statement urges a holistic approach to forest management.

This holistic approach to forest management in NSW is largely absent with silo management structures for the conservation and production forests on public lands and easily accessed and understood management systems for private natural forest owners largely absent. In addition plantations are seen by some groups as good and production from natural forests is bad. There is no considered evidence for this view and plantations do not provide the full suite of wood products that Australia and the export market desires. In a holistic approach they should be considered as complimentary production systems providing different products.

The NFPS vision is as follows:

The Governments share a vision of ecologically sustainable management of Australia's forests. This vision has a number of important characteristics:

 The unique character of the Australian forested landscape and the integrity and biological diversity of its associated environment is retained.

- The total area of forest is increased.
- There is a 'holistic' approach to managing forests for all their values and uses so as to optimise benefits to the community.
- Private forests are managed in an ecologically sustainable manner and in close cooperation with public forest managers, to complement the conservation and commercial objectives of public forests.
- A range of sustainable forest-based industries, founded on excellence and innovation, will be expanding to contribute further to regional and national economic and employment growth.
- Forests and their resources are used in an efficient, environmentally sensitive and sustainable manner.
- Forest management is effective and responsive to the community.
- The Australian community will have a sound understanding of the values of forests and sustainable forest management, and will participate in decision-making processes relating to forest use and management.(NFPS, p3)

As mentioned above private natural forests in New South Wales are still predominantly unmanaged and any activities are not well or consistently recorded. Private landowners do not have any easy access to market information or technical assistance to assist them with forest planning especially for harvesting or improving their forest for conservation outcomes.

A more integrated approach to the management of conservation and production forests on all tenures is required in New South Wales.

There are eleven broad goals of the National Forest Policy Statement which are briefly

- 1. Conservation
- 2. Wood production and industry development.
- 3. Integrated and coordinated decision making and management
- 4. Private native
- 5. Plantations
- 6. Water supply and catchment manage
- 7. Tourism and other economic and social opportunities\
- 8. Employment, workforce education and training
- 9. Public awareness, education and involvement
- 10. Research and development.
- 11. International responsibilities

Australia's Moral Obligation

Australia is a large and wealthy country by any world standards and we have the skills, training and research capacity to manage our forests better than many other countries.

Harvesting in natural forests has declined from 10.8 million cubic metres in 2000-01 to 3.9 million cubic metres in 2015-16 (ABARES – Forest and Wood Products Statistics, 2013 & 2016). This is a reduction of over 60%.

Australia according the FAO is the 7th most forested country in the world but on a per capita basis Australians have more forest per person than every other major country except Canada and Russia. Yet Australia is a net importer of forest products with an annual import bill of \$2.4 billion (ABARES, Forest and Wood Products Statistics, 2017).

This is not an economic argument but a moral one. Australia is living off forest products from other countries that have less forest area per capita than Australia does. We are either underutilising or preserving our forests at the expense of other countries to support our lifestyle. We need to utilise more and value add more of our forest products so that we do not rely on the limited resources of other countries forests.

Tenure does not equal management

I am concerned that public funds to manage the forests in New South Wales is decling, particularly within the National Parks service and the flow on impacts will be detrimental to the long term health of the states forests.

Monitoring under the Regional Forest Agreements was meant to cover all forest tenures to ensure the Comprehensive and Adequate Reserve system was effective. I am unaware of any consistent monitoring of our conservation forest areas.

New South Wales has more National Parks than New Zealand (13), the United States of America (58) and Canada (47) combined. Yet we still have problems of threatened species and potential extinctions. Changing tenure is clearly not the solution and it is questionable as to whether we can fund the National Parks that we have now. More monitoring and funding is required to understand the impact of these parks on threatened species. Have we objectively asked the questions "Are they working?"

Improving forest management operations and practices

Over recent years the management of New South Wales production forests has been challenged by various stakeholders and these challenges have gained considerable media coverage. Two obvious examples are the inhabitation of various state forest by koalas and the management of threatened species like the southern brown bandicoot.

The increased focus by stakeholders has placed increased pressure on harvesting operations and increased the scrutiny of regulations and the interpretation of management instruments like the Code of Practice.

I am aware that gaining consensus or even technical guidance on what is or is not possible has been a challenge for forest industry operators. This causes delays and frustrations to the commercial operations of industry and the normal workings of government.

Management of any forest requires long term planning which invariably covers multiple decades and this time horizon is contrary to the immediacy of the politics of the day, a story hungry media and the constant change of modern living.

It is very hard to get people to think about forests over a 100 year time horizon.

Forests are dynamic and the New South Wales forests that exist today will be different in some way tomorrow. It is nearly impossible to define every aspect of forest management to written rules and regulations. Forest managers need skilled experts who are capable of providing independent comment on field interpretations of the legislation, regulations and rules related to forest management, tree harvesting and plantation development.

In my opinion, the current forest management process is ineffectively responding to the environmental, stakeholder, industry and political challenges of managing the states forests (natural and planted but mostly natural forests).

In response to this there is increasing scrutiny and complaint from some stakeholder groups.

A simple option to improve decision making within forest operations and a proven technical solution from another state is for New South Wales to consider the establishment of an independent Forest Practices Authority similar to the authority which has operated successfully in Tasmania for the last 30 years. Or and alternative could be to establish independent forest practices offices registered through a professional body like the Institute of Foresters of Australia.

It is a testament to the Tasmanian Forest Practices Authority that it has survived all the challenges and turmoil that have occurred in the Tasmanian forests since the late 1980s. In general conversation with both public and private managers and operators at all levels it appears to have worked well and provided planning certainty and confidence for all stakeholders that best practice in all aspects of forest management are being met. A similar body or group of professionals could be developed in New South Wales

The following extract from the Tasmanian Forest Practices Authority website provides a useful introduction:

The (Tasmanian sic) Forest Practices Authority is an independent statutory body that administers the Tasmanian forest practices system on both public and private land. Its primary responsibility is regulating the management of forest and threatened non-forest vegetation.

The system is based on a co-regulatory approach, combining self-management by the industry and independent monitoring and enforcement by the Forest Practices Authority. Forest Practices Officers are trained and authorised by the Forest Practices Authority and employed within the industry to plan, supervise and monitor forest practices. Forest Practices Authority staff provide advice on regulatory and technical matters, including requirements for the protection of natural and cultural values. The Forest Practices Authority also monitors forest practices to ensure that standards are being met. Corrective action is taken where required, which can include completion of remedial works, fines or prosecution.

The FPA has a statutory responsibility to report annually to parliament on the forest practices system and the operations and performance of the FPA.1

A Forest Practices Authority or group of professionals should be considered not only for all harvesting operations but cover all forest managers both public and private so that all managers work to the one set of rules and definitions. Funding could be a combination of public and private sources based on forest management operations. An appropriately skilled (i.e. skills in geology, hydrology, culture, ecosystems and threatened species etc) and independent authority can remove itself from any government or industry conflicts of interest and as such bring confidence to both the government and stakeholders that best practice is being undertaken.

In summary the benefits would be:

A landscape approach to forest and biodiversity management as it would cover all tenures and forest types which is in accordance with the NFPS

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¹ http://www.fpa.tas.gov.au/

A co-regulatory approach means all stakeholders can have input into how the Authority operates but once defined the Authority then operates independently and with impunity, although an appeal process should be available.

- One rule book for all managers and expert adjudication on "grey" areas of the Code of Practice.
- Regulatory clarity
- Transparency, as all actions would be reportable to the Victorian Parliament
- It helps to remove government from their conflict of interest as operator and regulator

In summary, tt is very hard to live a day without using wood. Humans have used forests for survival and protection since the beginning of time and wood is one of our most environmentally friendly products we can use to build a sustainable future. It can be grown sustainably, it sequesters carbon, it is easy to re-cycle, and it is bio-degradable. Whether it is paper or the timber used in our houses and furniture Australians will continue to use wood daily in some form and we will continue to need production forests. As a nation we have a moral obligation given our wealth, skills and forest resources when compared to other countries to meet our own demand and remove our trade deficit in forest products.

