



Member of Nature Conservation Council of N.S.W.

P.O. Box 2127 Boronia Park 2111

NSW Regional Forest Agreements Forestry Branch Environment Protection Authority PO Box A290 Sydney South NSW 1232 21 February 2018

Dear Sir/Madam.

We write to express our strong objection to the renewal of the three Regional Forests Agreements in NSW (Eden, North East and Southern). Our members feel that the RFAs have failed to achieve an intended objective of sustainable management of NSW's native forests that are integral to the state's natural heritage. Unless there is a radical shift in forest management based on best scientific knowledge the values of these public resources will continue to be severely diminished and ultimately destroyed. The significant environmental, social and recreational benefits they currently provide will not be available for future generations.

We are a conservation group established in 1966 largely in response to a local Council proposal to extend a rubbish tip in the Field of Mars Reserve, East Ryde. This proposal was successfully opposed by Society members and local residents and the Field of Mars Reserve remains an area of highly valued Crown land for the purposes of public recreation, with a later re-dedication to include purposes for the protection of native flora and fauna.

The 50 hectare reserve, mostly natural bushland, is now a Wildlife Refuge and contains the award winning Field of Mars Environmental Education Centre visited by over 15,000 students each year. It provides important ecosystem services, including improved air and water quality to local residents, as well as making a valuable contribution to the amenity of local suburbs enjoyed by many people, both residents and visitors.

Similarly to the protection of the local Field of Mars Reserve, RHHFFPS members are concerned that NSW's public native forests are managed sustainably so as to ensure that the many values and benefits of our forests are available for future generations of both humans and native fauna. In this submission we focus our concerns in relation to the management of native forests on public land. Overall, we would urge government to rapidly shift to a timber supply based on plantation forests on public and private land rather than a reliance on Australia's native forests.

Native forests provide a range of values to all Australians including:

- habitat corridors for our native species such as the iconic koala,
- important hollow bearing trees vital for around a quarter of Australia's vertebrate fauna,
- valued recreational activities, for a range of user groups and interests,
- tourism opportunities,
- improved understanding of NSW's cultural heritage,
- opportunities to earn carbon credits,
- mitigation of climate change impacts,
- water catchment protection and supply of good quality drinking water,
- increased water yield,
- protection of Australia's biodiversity which is fast declining,
- preservation of healthy soils and
- improved air quality.

It is our understanding that State and Commonwealth governments have committed to "provide for the ecologically sustainable management and use of forested areas in the regions" as per the stated intent of the RFAs.

According to the Review Report (page viii):

"The NSW RFAs establish a 20-year framework for forest management. Their purpose is to:

- identify a comprehensive, adequate and representative (CAR) reserve system and provide for the conservation of those areas
- provide for the ecologically sustainable management and use of forests
- provide long-term stability of forests and forest-based industries."

If the objective above is a genuine commitment by government, then this review should provide an opportunity to thoroughly, robustly and transparently determine whether the RFA process has delivered for all Australians and their native forests. It should not trigger an opportunity to justify and support a continuation of a heavily taxpayer subsidized industry which employs overall very few people. ¹

It is our concern that the NSW Regional Forest Agreements Implementation Report 2004–2014 is a limited assessment of NSW's forests which has not taken account of the many independent and academic studies currently available to government. The 2004-2014 Report lacks scientific rigour, is based on out of date data and does not consider climate change issues. It would seem that the RFA process itself lacks the capacity to undertake a genuine review based on the best available science.

For example, the critical seven criteria to assess sustainability indicators are more descriptions rather than qualitative assessments, not supported by current evidence based science and conflate the different economic relations within Australia's timber supply industry.

¹ RHHFFPS does understand how important the concentration of this small employment sector is within some regional communities and recognizes the need for transition employment and training programs when native logging ceases.

Likewise the 60% achievement of objectives mostly provides a description of the reporting requirements met and descriptive milestones rather than any thorough ecological assessments of the native forests.

It is our serious concern that this outdated and flawed report will be used to justify the continuation of the RFAs which by all independent and objective data have failed the native forests and the forest industry in NSW.

Biodiversity loss continues at a fast and shameful pace in NSW and even the koala, dependent on native forests, has been listed as threatened since commencement of the RFAs. NSW still lacks a comprehensive, adequate and representative reserve network of forest ecosystems which the RFA process has failed to properly and independently address and rectify.

We strongly urge that the RFAs be ceased and that government recognizes the critical need for a reformed and sustainable approach to native forest management on public land that is in the genuine public interest for the longer term.

Yours sincerely Cathy Merchant RHHFFPS Committee Member