



Regional Forest Agreement (RFA) review and extension submission guide

Regional Forest Agreements (RFAs) are 20-year agreements between the State and Commonwealth Governments that permit the logging of public native forests. Under the RFAs forests in NSW have suffered through intensive logging which damages not just the trees being logged but many threatened species which rely on healthy forests. These public forests belong to the people of NSW and we now have a vital opportunity to have a say on how they are managed in the future.

Lodging submissions

Submissions are been taken through the Environmental Protection Agency (EPA) and the Department of Primary Industries (DPI). Please take the time to send a submission to both.

Lodging a submission with the EPA

Step 1: Download and complete a submission cover sheet from the EPA website

Step 2: Lodge your submission using the online form

Or email: forestry.policy@epa.nsw.gov.au

Or mail to:

NSW Regional Forest Agreements
Forestry Branch
Environment Protection Authority
PO BOX A290
Sydney South NSW 1232

IMPORTANT! All email and postal submissions on the RFA reviews must be accompanied by a cover sheet.

Lodging a submission with the DPI

Step 1: Download and complete a submission cover sheet from the DPI website

Step 2: Lodge your submission using the online form

Or email: forests@industry.nsw.gov.au

Or mail to:

NSW Regional Forest Agreements

DPI Forestry

Department of Primary Industries

GPO Box 5477

Sydney NSW 2001

IMPORTANT! All email and postal submissions on the RFA reviews must be accompanied by a cover sheet.

Submission Guide

Background

There are three RFAs in NSW and they expire in 2019 (Eden); 2020 (Southern) and 2021 (North East). *This is therefore a once-in-a-generation chance for the community to influence the management of public native forests. Your submission is important.*

The RFAs were preceded by Comprehensive Regional Assessments (CRAs) which involved detailed ecological investigations. The CRA data provided the foundation for the RFAs. RFAs accredit logging under the Commonwealth *Environmental Protection and Biodiversity Conservation Act* (EPBC Act) so day to day Commonwealth oversight is removed from logging operations.

Broadly, the RFAs were designed to facilitate multiple uses of public native forests: conservation (via the establishment of a Comprehensive, Adequate and Representative, CAR, reserve network of forest ecosystems); timber extraction and recreation. The concept of Ecologically Sustainable Forest Management (ESFM), which incorporates the principles of Ecologically Sustainable Development, was to underpin logging to ensure that logging did not result in negative impacts on forest ecosystems.

Under the broad goals were a suite of aims of the RFAs pertaining to various issues such as ESFM; threatened species; World Heritage and Wilderness; community uses of forests and providing for a thriving timber industry. NPA conducted a detailed review of RFAs in NSW in 2016 and concluded that they have failed to achieve their aims.

Key comments to include in your submission

1. **The RFAs must not be renewed.** The RFAs have failed to protect the environment, failed to result in a thriving timber industry and are driving climate change. The RFAs are therefore a failed model for forest management.
2. **This public asset must be managed for the public good.** Logging is robbing future generations. The progress report for the RFA review fails to provide any data to support the assertions that logging is conforming to ESFM. In contrast, there is lots of evidence that forest wildlife is in decline, we know logging reduces carbon stores and water supplies and we know the majority of people support protecting forests.
3. **We can implement alternative models for forest management.** We can do better than industrially logging diverse, living ecosystems. National Parks Association of NSW's (NPA) Forests For All plan seeks to protect forests to facilitate increased human access for health and wellbeing, recreation and education. The Great Koala National Park proposal would help protect koalas and become a huge tourist attraction (*local groups should also reference their own national park proposals*).
4. **Other values of forests must be considered.** Research in the Victorian Central Highlands shows that the value of water, carbon and tourism dwarf that of timber. Our Governments must consider all economic and social benefits from forests.
5. **The Government should use the end of the RFAs as the point at which it implements a just transition out of native forest logging on public land.**

Other points to consider in your submission

The RFAs are bad for forests

- Almost 20 years after the RFAs were signed, there is extensive evidence that the RFAs have failed to facilitate Ecologically Sustainable Forest Management; failed to result in an economically sound timber industry; and the CAR reserve network of forest ecosystems has not been delivered. RFAs are therefore a failed model for forest management and should not be renewed.
- EPBC accreditation of logging operations has resulted in lower protection for forest species, and has not been complied with, as demonstrated by the multitude of license breaches. Commonwealth oversight of forest management must be restored.
- The review's progress report frequently addresses indicators without providing any data. For example, no spatial data is provided to assess the change in forest growth stage over the life of the RFAs, no data is provided to assess the proportion of each forest ecosystem protected or impacts on species and no data is provided on the value of forest-based services.
- The number of threatened forest species has continued to rise during the RFAs, with iconic species like koalas and gliders now either absent or experiencing population crashes in many parts of NSW. Logging is identified as a key threat to many forest species, often because of the impact logging has on key habitat features like hollow-bearing trees.
- Logging kills forest animals and is therefore an important animal welfare issue.
- Climate change was not considered as part of the RFAs, but is now the largest social, economic and environmental challenge we face. It is reckless to continue logging when we know it reduces carbon stores of forests.

- The RFAs removed public oversight of logging by excluding ‘third parties’ from taking legal action on logging breaches. This has resulted in a lack of accountability and transparency in their implementation and has favoured industry over the public interest.

Jobs and the economy

- The NSW taxpayer has paid millions of dollars to a multi-national corporation to buy-back non-existent timber because of over-estimated timber volumes by Forestry Corporation. This is one of a series of subsidies that the logging industry receives.
- The logging industry is one of the most mechanised and most dangerous. The number of direct jobs in the industry has steadily declined and is now estimated as under 400 across NSW.

Alternative options for public native forests

- We have other options besides logging. NPA’s *Forests For All* plan is proposing that we protect public native forests and use them to increase public access for health and economic benefits. NPA’s Great Koala National Park proposal is designed to protect the world’s favourite animal.
- There are many forested areas in the three RFA regions that should be protected in the reserve network. For example, the forests of northern NSW are one of just 36 global Biodiversity Hotspots, there are forested areas across NSW that should be World Heritage, and there are outstanding wilderness additions.
- We know that the value of carbon, water and tourism from forests is much greater than timber, and that protected areas are important for the economy. The Government must assess these trade-offs as part of a genuine review.
- Polling conducted in the north coast electorates of Ballina and Lismore in December 2017 showed that 90% of people support protecting forests for nature, water, carbon and recreation. Under 10% supported logging for timber, woodchips and biomass burning.

The consultation process

- The NSW Government has already committed to extending the RFAs. This commitment was made prior to the review that is now being conducted, so this consultation cannot be regarded as genuine. The review should be collating evidence to assess the performance of the RFAs with a view to making an evidence-based decision assessing whether they are an appropriate model for forest management.
- The consultation process is entirely inadequate as the outcome appears to be predetermined. The RFAs affect two million hectares of public property in NSW, and very few people under the age of 30 are likely to have heard of RFAs. A concerted effort must be made to have genuine community consultation on the future of public native forests.
- The reviews are so late as to make them meaningless. The entire rationale of the reviews – that the community can have confidence in the RFAs because of a transparent and timely review – has been seriously undermined.
- In order to be effective, the independent reviewer must consult independent scientists (not just government agencies) and must undertake on-ground inspections of logging impacts with community groups.