

SOUTH EAST TIMBER ASSOCIATION SUBMISSION TO THE RENEWAL OF THE NSW REGIONAL FOREST AGREEMENTS

RFA Renewals, Negotiable Items

1. Five-Year Rolling Extension Mechanism.

The South East Timber Association (SETA) supports a five year rolling renewal mechanism. As part of the process, reporting will need to be timely and not involve the excessive delays associated with the current RFA reviews.

2. Simplifying Structure and Content

SETA supports simplification and believes the structure and content must focus predominantly on outcomes relating to the four principles underlying the RFAs. The content and reporting should not continue to be cluttered with an extensive activity list. More detailed actions might best be contained in action plans that sit under the Principles Document. If the underlying actions are relevant and completed in a timely manner, high level reporting should then be relatively simple and less expensive than the current process.

3. Updating references.

SETA has a view that updating of relevant documents should be done as part of the 5 yearly reviews.

4. Addressing Emerging Issues

A number of SETA members have experience in forest ecology, fire science and other fields. Many SETA members have observed the forests for decades. There are some positive improvements in forest management over the past two decades.

Predator Control

Over the past decade predator control has become more regular and applied broadly across large areas of state forests and some parks and reserves. This program specifically targets foxes and wild dogs. The response of some critical weight range (CWR) mammals such as potoroos and bandicoots has been remarkable and makes a mockery of activist claims that harvesting is the only threat to these species.

Unfortunately, there is no specific targeting of feral cats across the broad landscape and consequently species at the bottom of the CWR continue to decline, despite the large increase in the area of "protected" parks and reserves.

A number of other negative issues are affecting NSW native forests.

Wildfire and Megafires

South east NSW native forests, generally east of Kosciusko National Park (KNP) have largely missed the megafires that decimated 60 percent of the KNP in 20-03. These fires impacted about 2,500,000 (2.5 million) hectares of mostly forested land over a 60 day period, killing an estimated 370,000,000 (370 million) birds, mammals and reptiles.



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2002-03 Fire Devastated Protected Forests – Not Sustainable, Recovery Not Monitored

In the Canberra Times on 28 January 2007, four years after the fires, retired CSIRO scientist Noeline Franklin was interviewed. The article in part reported: *For every 1 ha burnt, 19 birds, four mammals and 178 reptiles were killed, according to her research.*

Those not burnt to death were killed by smoke-related ailments.

"Birds can't escape it either, because temperatures reach up to 1600 degrees. – they can't fly above it," she said.

She said it would take up to 100 years to recover the numbers of animals lost.

"The losses are huge. You walk through the Cotter catchment area now and you won't see a single lizard.

"You used to hear birds singing to wake you up in the morning, but now if you even hear one you would record it in a diary entry."

Ms Franklin said governments and the media were quick to address the issue of property damage but wildlife preservation had been neglected". We've got to do something – What wildlife is left needs to be looked after."

In the past 20 years, there has been a massive increase in forest fuel loads, so it is only a matter of time before devastating fires will impact south east NSW forests, unless there are significant reductions in forest fuel loads.

SETA is concerned by the loss of firefighting capacity with the wind down in the timber industry and forest service over the past 20 years. The reduction in capacity has been further exacerbated by the recent National Parks and Wildlife Service restructure.

Since the 2002-03, there has not been enough focus on biodiversity recovery on about 2 million hectares of NSW native forest devastated by fire over the past 15 years. Instead, the dominant NSW forest regulator spends significant time on tape measure audits and investigations on the relatively small area of forest subject to harvesting each year in NSW.

There must be a new monitoring and audit framework put in place across both State Forest and National Parks, which has a conservation outcomes focus. The information arising from this framework would then be used to prioritise expenditure on biodiversity recovery programs.





15 Years After the 2002-03 Megafires Large Areas of Forest Remain Scarred & Eerily Quiet

Decline in General Forest Health

Another widespread, but more insidious issue, is the general decline in forest health across large areas of the NSW native forest estate. Outside those decimated by high intensity fires. This issue links back to the megafire issue, as the elimination of frequent low intensity burns not only exacerbates megafire risk, it also changes soil chemistry, which impacts on general tree and forest health.

Intense competition from historically high tree numbers and understorey also contributes to the stress.

Insects that overwinter or otherwise reproduce in the litter layer also benefit from loss of low intensity burning, having higher survival rates, resulting in abnormal levels of defoliation in many forest areas.

Unhealthy forests have excessive numbers of trees with crowns dominated by epicormic growth. Epicormic shoots are a response to significant stress and have significantly less flowering capacity than normal healthy crowns.

Loss of flowering capacity potentially impacts on food resources for threatened species such as the Swift Parrot.

The conservation model involving the transfer of state forest to the parks and reserves network has proved to be ineffective. Parks and reserve underperformance in the delivery of environmental services has been hidden by a failure to monitor key indicators across most of the reserve estate.

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While this lack of transparency continues, governments and government agencies will continue to cut back the productive forest land base, to the detriment of remote and regional timber dependent communities.

Recommended Future Actions

A) Undertake a radical reform of the current lockup and neglect conservation model and develop a regulatory model that allows for active and adaptive management of native species, from intact ecosystems through to fragmented landscapes. Some level of active management is needed across all of NSW, if the growing list of threatened species is to be reversed.

B) Review the skills of Environment Protection Authority and Office and Environment and Heritage staff to ensure those charged with management of parks and reserves can distinguish the difference between healthy, functioning ecosystems and those that are in chronic decline.

C) Place a proper focus on the social and economic aspects of the RFAs and commit to undertaking social and economic impact assessments before any changes are made to the to the State Forest land base or the log supply levels in future.

D) Parks and reserves must to subject to higher levels of biodiversity monitoring, with five yearly reporting in line with RFA reviews.

More detail on RFAs and recommendation A) is set out below.

Regional Forest Agreement Principles.

The principles underpinning the Regional Forest Agreements (RFAs) were to:

- *establish a framework for the management of forests in the RFA regions;*
- *identify areas and regions that the Parties believe are required for the purposes of 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 forested areas in the Regions: and*
- *provide long-term stability of forests and forest industries.*

The South East Timber Association (SETA) agrees with and supports those principles.

While the first principle has been met, SETA believes that the second principle has been over-subscribed. With almost eighty percent of public land in NSW being in formal parks and reserves and large areas of the remaining two million hectares of State Forests being unavailable for timber supply, due to environmental requirements, the RFAs have failed to provide long-term stability for rural communities dependent on the forests and the associated processing industries.

SETA is most concerned that the current regulatory and management framework fails to provide ecologically sustainable management in either the parks and reserves or the many areas of State Forest. In addition, environmental charities and various activist groups continue to harness an ill-informed public to put an end to timber production in all Australian



native forests, on the simple assumption that a change of land tenure will ensure the survival of a currently growing list of threatened species.

What is Wrong with the Current Conservation Framework?

The current conservation framework appears to have roots in the concept of *terra nullius* (nobody's land). Conservation management language, concepts and practices that underpin the *terra nullius* approach, include wilderness, precautionary approach and passive management. The precautionary approach is too often used, as an excuse to do nothing.

A common management principle for NSW National Parks, Nature Reserves and State conservation areas, is *the conservation of biodiversity and the maintenance of ecosystem function (National Parks & Wildlife Act 1974)*. In a practical sense this largely defaults to passive management, with some fuel reduction or ecological burning across a small percentage of the estate each year.

Consequently, understorey in many forest areas is much denser and there is much more competition for soil water. With altered fire regimes, nutrient cycles have changed and flammable litter levels are at an all-time high, compared to historical (more than 200 years ago) times.

The frequency of intense wildfires has increased and once large bushfires have become mega fires. Unhealthy forests (dying branches replaced with epicormic crowns) have become the norm and bell birds have become a scape goat, when they are merely reacting to the more favourable breeding conditions that unhealthy forests create for nesting and their prime food source, psyllids.

SETA is concerned that the terra nullius management approach, including insufficient traditional and/or ecological burning and insufficient broad scale predator control, is leading to suboptimal conservation outcomes across large areas of the NSW conservation reserve system. The same issues also affect parts of the state forest estate to a varying extent.

The burning that is done is generally too infrequent and has poor operational implementation, including lighting lines of fire around perimeters, across the wind and from the bottom of slopes and hills. When large blocks are burnt in one day, significant areas of the block may be subject to higher than desired fire intensity.

What Needs to Change?

The existing regulatory frameworks need to be amended to codify active and adaptive management as a blue print for future ecologically sustainable forest management across all land tenures.

Scientific research needs to be interpreted in the context of over 50,000 years of management, at a landscape level, by aboriginal people. The combination of aboriginal and natural fires had a fundamental effect on the development of ecology and ecosystems that existed at the time of European arrival.

The loss of aboriginal management of the land has created a major ecological disturbance, that many ecologists fail to recognise, when interpreting research results. The problem is further exacerbated when scientists report research outcomes, with an eco-political agenda, rather than a specific scientific objective.

Parks and reserve managers must undertake co-ordinated surveys for a broader range of key species and report on a five yearly basis, in line with RFA reporting, to demonstrate the CAR reserve system is delivering the conservation outcomes that were expected at the time this land was reserved. The limited amount of work that has been done makes it clear that ecologically sustainable forest management is not being achieved.



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If the CAR reserve system provided the environmental services that should be produced, the pressure to transfer more land from production forests to the reserve system would be greatly reduced.

SETA believes that the ongoing campaign to close down all native forest harvesting will shift more and more of the impact of Australia's forests product consumption offshore, often to countries with lower environmental protection standards. This is unacceptable.



Harvested & Regenerating Australian Forest
Unacceptable to "environmental" charities



Harvested & About to be Cleared Indonesian Rainforest
Out of sight, out of mind – tell someone who cares

When members of the public respond to this issue with a simple "so what" or believe that NSW only has ten to fifteen percent of public land in the parks and reserves, this highlights that the public is not in a good position to make informed contributions to the native forest debate.

Continuing to shift more of the impact of our forest product consumption to less protected forests, offshore, is immoral, arrogant and unsustainable.

Conclusion

The politicisation of forest reservation decisions, such as the 2010 redgum decision, will support an immoral shift of environmental impacts offshore and decimate small regional communities. For example, the combined impact of the Victorian and NSW government red gum reserve decisions to "protect" a quarter of a million hectares of forest, with alleged tourism benefits, resulted in a twenty three percent decrease in visitor numbers to the town of Mathoura within four years.

For over 25 years, small communities across NSW have experienced negative social impacts following cutbacks to the native forest industries. The promised replacement jobs in eco-tourism have proved to be nothing more than eco-activist and political hot air.

Native forest management across all tenures must be driven by active and adaptive management processes, that incorporate a historical ecological perspective. This perspective is totally missing from current legislation and management of native forests.

A reformed conservation management framework will allow for the ongoing use of less than twenty percent of the total public native forest estate for the sustainable production of forest products, as well as providing a fair share of environmental and recreational services.

