

Canopy Native Forest Committee
Total Environment Centre
Level 4, 78 Liverpool Street
Sydney NSW 2000

The Resource and Conservation Unit
Department of Environment and Climate Change
PO Box A290
Sydney South NSW 1232

**Submission on the Draft Report on Progress with Implementation of the
New South Wales RFAs**

Dear Sir/Madam

Thank you for the opportunity to make a submission on this important matter.

This submission is being sent on behalf of the Canopy Native Forest Committee of the Total Environment Centre, a voluntary organization concerned with the protection of our forests and wildlife from damaging and inappropriate activities.

This Committee has previously made submissions to the assessment process leading up to the three RFAs for the Eden, North East and Southern Regions, being particularly involved in the latter with our Deua-Tuross Park Plan.

While acknowledging that the RFAs have delivered important reserve outcomes and some stability to the timber industry, Canopy believes that they have failed to deliver on their key objectives of protecting environmental values, ecologically sustainable management of all native forests and the encouragement of job creation and growth in forest-based industries.

On the contrary we have seen the continuing reduction of old growth forests and threatened species populations, degradation of endangered ecological communities, loss of water quality and quantity, erosion and further massive greenhouse emissions due to industrial scale logging and overburning of our native forests.

Those parts of the forest-based industries with the greatest potential for job growth; tourism and the plantation sector, have been compromised by the ongoing encouragement of intensive native forest logging, much of it for low value products. The sustainability of the latter in terms of timber resources remains in question.

The progress report needs to take into account the most recent scientific research and the latest findings by government bodies in assessing the adequacy of the current RFAs.

I refer in particular to the interim report issued by the Federal Environment Department on 30 June that found that the RFAs had done little to protect the environment and were unaccountable, difficult to measure and almost impossible to enforce.

Further, there is the NSW Audit Office's Report into Sustaining Native Forest Operations that confirms that native forest logging in the North East is outpacing supply, at least with regard to high quality sawlogs and that out of date yield estimates have been provided for other regions while native forest operations overall run at a substantial loss.

These reports paint a vastly different picture of the RFAs to that being presented by the draft document.

The draft report fails to take into account the most recent scientific research into the carbon storage qualities of native forests conducted by the Australian National University (Green Carbon – the role of natural forests in carbon storage – Mackey). This report underlines the importance of protecting native forests as part of the solution to climate change and the contribution of native forest logging to greenhouse gas emissions. The draft RFA report is out of date and only discusses plantations with regard to the global forest carbon pool.

The draft report also fails to come to grips with recent findings by the University of Queensland concerning the link between native vegetation clearance in Australia and the intensity of recent droughts.

The RFAs do not adequately allow for the possible impacts of climate change on native forest ecosystems and their water yield that require modifications to their management.

The latest information and the apparent failure of the RFAs to address legitimate environmental and economic concerns make a case for their fundamental reform. Clause 8 in these agreements should be utilized.

There should be a greater emphasis on nature conservation and climate change and water issues in the modifications to these RFAs.

There is no reason why reserve boundaries should not be reconsidered. Canopy would welcome further necessary reserve additions in areas of the Badja and Dampier State Forests in the Southern Region and in Boonoo State Forest linking Basket Swamp and Boonoo Boonoo National Parks in the North East. The draft report itself notes further reserve declarations since the RFAs were made.

Stronger RFA review requirements and performance audit arrangements must be implemented. The Federal Government needs to be given a role in enforcement of the RFA conditions. The delays in the release of the current RFA reviews have been disgraceful.

Much more information has to be made publicly available regarding the actual timber yields under the RFAs and the twenty year wood supply agreements that have such a bearing on their operation.

Canopy hopes that the State and Federal Governments will seriously address the need to improve these RFAs.

Yours faithfully

Graham Daly
Chairperson
07/09/09