

Submission the RFA Review

Send to <https://engage.vic.gov.au/future-of-our-forests/rfa-consultation-paper>

The history of native forest logging in Australia has been ‘cut out and get out,’ beginning with Red Cedar in New South Wales, which was rapidly mined to the edge of extinction. Native forests are still regarded as a large free resource ripe for wood theft from the Aboriginal estate.

Problems with the Process

The Memo of Understanding signed by the Victorian and Federal governments (27 March 2018) indicates a predetermined outcome: native forests will be logged no matter what Victorians or anyone else thinks. The larger issue thus pre-empted, we are left with a leading questions i.e. what shape should ‘modernisation’ take? I think most people do not want a new version of clearfell logging, which undoubtedly is what will be offered.

With DELWP departmental head deciding the Terms of Reference, and who will sit on the scientific committee, the committee cannot be regarded as independent.

The scientific community (including Arthur Rylah Institute and The Royal Society of Victoria) involved in this process are either government agencies or beholden to government or both.

The exceedingly narrow Terms of Reference mean no sensible conclusions can be reached.

The convoluted nature of the public consultation, which involves countless reviews, inquiries, and departmental propositions, only tends to confusion., and designed to hide the business agenda which is to get as much wood out of native forests as quickly as convenient to maximise profits

On the DELWP timeline, the RFA review apparently ends before threatened species are dealt with, which seems problematic if consultation is genuine. Is the survival of threatened species an irrelevant afterthought?

Bill Jackson Independent Review

There are obvious restraints on the ‘independent’ reviewer i.e. he can only look at published documents.

Mr Jackson uses the language of the logging industry when referring to wood extraction from native forests as ‘timber’ production, when most of the wood extracted goes to wood pulp.

He accepts the highly manipulative language of the logging industry by equating native forest with plantations. Clearfell logging in native forests is a plantation operation, not a native forest logging operation, because under the clearfelling regime natural forest is turned into a short rotation crop.

He ignores the de facto conversion of native forests into plantations i.e. a timber crop on short rotations to maximise profits.

He talks about logging as if it is the only forest industry. Water production is a forest industry, and a far more essential and valuable one than wood production. Other forest industries are pollination, honey, tourism, carbon store, gene store, recreation, habitat.

There is no mention of the listing by the IUCN in 2015 of Mountain Ash as critically endangered

The whole of this RFA debate uses a reductionist approach i.e. discussing aspects of industrial logging, but ignoring the obvious – that industrial-scale logging is simply not consistent with preserving forest values.

What of the relation of native wood resources with other policies e.g. human population growth, paper recycling, alternative wood and fibre sources?

The lack of information and reliable data is another problem e.g. how much is paid in log royalties by the Maryvale pulp mill? What is the cost structure of the logging industry?

Critical Need to Remove Industrial Logging from Native Forests

All of the RFAs in Victoria have proved to be an environmental, economic and social disaster
Proof of the pudding is in the eating -

- A. Forest species rapidly declining in forested logging areas
- B. Little sawlog resource left – most sawmills closed down
- C. Many regional communities disrupted by loss of employment and social conflict due to unsustainable resource use of water, wood, native vegetation, and soil.

Victorian governments ignore water loss and water pollution to streams caused by logging. Clear fell logging in cool temperate forests such as Mountain Ash (*E. regnans*) reduces water yield in the clearfell areas by up to 50% during the first 60 years of regrowth. The overall reduction in water yield from a catchment can be 20% or more. The heavily logged Central Highlands in Victoria supplies most of Melbourne, plus water to the Murray Darling river system and the McAlister irrigation area in Gippsland. The value of water loss to these consumers far exceeds any profit from timber and wood sales.

Landscapes are being dried out by clearfell logging on a massive scale as young regrowth use a lot more water than old forests. This in turn reduces water to streams meaning reduced water for farms and towns, and includes loss of water to aquifers.

Industrial scale logging, because it dries out the landscape increases the risk and severity of bushfires.

Current management ignores combined impacts of logging and burning (planned burn and wildfire) in forested areas

Current management also ignores subsidiary impacts of logging such as increased access to feral animals and weeds (notably blackberry in the Central Highlands), and also ignores impacts of roading (erosion and water pollution) and deliberate destruction of old trees ('hazardous' tree removal)

No examination of the economics of native forest logging

The wood resources in native forests have shifted away from timber production and into pulpwood production, to the extent that now at least 85% of wood coming out of native forests is pulpwood.

Native forests where logging occurs are being transformed into plantations which produce predominately pulpwood. So they are no longer native forests, they are plantations, but the official discussion does not mention this. The discussion does not differentiate between native forests and plantations.

Resources are placed in the hands of fewer and fewer people, with reduced environmental safeguards – winner takes all, and leaves the mess for taxpayers to deal with.

The native forest logging industry requires a large bureaucracy, and also wastes a lot of community time and money navigating that largely unaccountable bureaucracy and opposing native forest logging.

Essential to Remove Exemption from Commonwealth Environmental laws

It is essential to remove the exemptions in any RFA or other State/Federal forest agreement from the EPBC Act or its equivalent. At present the Commonwealth Government does not enforce the EPBC Act in respect of federally listed threatened species in forests subject to RFAs, and Victorian governments do not, generally speaking, bother to protect species listed under the Victorian Flora & Fauna Guarantee Act.

Solutions Needed to Benefit All

Unless industrial scale wood extraction from native forests is removed the outcomes are likely disastrous. It is hard to imagine why governments persist with such vigorous support for logging in native forests when the results are so detrimental to other industries and the natural environment. There has been no explanation given – the decisions are made behind closed doors, with no reasons offered.

Governments talk of “striking the right balance” but have not achieved it in relation to resource use but have not achieved a balance.

Removing all logging from native forests would allow private and public plantations to compete on a level playing field, and potentially improve environmental outcomes as well.

Currently, the benefits of native forest logging go to few people. Preserving forests by removing industrial scale logging and restoring forests to the rotation times of several hundred years would maximise benefits to a wide range of people.

Planting new forests and plantations and restoring and maintaining damaged forests could employ thousands gainfully and profitably. The current narrow focus on rapid growing plantation trees could, in many cases be broadened to putting in trees for multiple purposes e.g. fire wood production plus salinity control plus honey production plus carbon storage plus biodiversity protection.

In this discussion fisheries have been left out. Native forests improve fisheries by providing habitat, food supply, and abundant clean water, and the food chain in the streams extends into

the estuaries, and then out to sea as young fish, and sharks, breed in estuaries and move into the ocean.

Half of Victoria's Forests have been cleared, and of the half remaining nearly one half are in reserves. Clearfelling however is a form of land clearing as can be seen below. It is not intended that these cleared areas return to natural condition, as the crop rotation times will be far too short.



An evolving tree farm? Image by [REDACTED]

Submitted by:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]