

Submission into the proposed RFA extension
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The RFAs are meant to be 20 year plans for the conservation and sustainable management of Australia's native forests. They are meant to provide certainty to commercial forestry operations while protecting environmental values.

The RFA agreement, negotiated in the 1990s, must satisfy all of the following conditions:

- environmental values, including old growth, wilderness, endangered species, national estate values and world heritage values;
- Indigenous heritage values;
- economic values of forested areas and forest industries;
- social values (including community needs);
- principles of ecologically sustainable management;

In addition

- the agreement provides for a comprehensive, adequate and representative reserve system;
- the agreement provides for the ecologically sustainable management and use of forested areas in the region or regions;
- the agreement is expressed to be for the purpose of providing long-term stability of forests and forest industries;

Some general points

The RFA has clearly failed on all counts. It has failed on economic grounds; it has failed on social grounds; and it has failed on environmental grounds.

The RFA, announced by Wilson Tuckey in 2001, was designed by industry for the benefit of industry to lock in industrial scale logging. Time has demonstrated that this is exactly what it has done. Continuing with this model will mean more of the same – high volume/low value production; increased volumes and decreased jobs; increased government subsidies with no incentive to transition to a high value industry. If the RFA is renewed we will continue to export huge volumes of unprocessed material and even get the stage where we will burn native forest in furnaces for energy because we cannot gain internationally recognised certification for our timber.

The forestry industry in Tasmania is in crisis, propped up by massive amounts of tax payer funds while exacting a huge environmental and social cost. Native forests are being sacrificed at the very time they should be protected for what they do best – protect biodiversity and ecosystems, provide fire resistant barriers, sequester carbon, produce clean water, moderate water flows and be maintained as special places for people to appreciate and to provide jobs in tourism and other non-extractive forest uses like bee keeping.

The RFA is the primary reason why, for the last 20 years, Tasmania has had one of the highest rates of logging in the world. The RFA has allowed the situation in Tasmania where, for a majority of the time, there has been a monopoly supplier (FT) and a near monopoly buyer (Gunns), the consequences of which have seen the collapse of both and a disastrous result for the environment, taxpayers and the environment. Globally significant

ecosystems have been trashed, sawmills closed and jobs lost. The RFA drove massive increases in the clear felling of native forests to feed the woodchip and plantation establishment industries. To give an example, in 2000, 5.5 million tonnes of woodchips were exported, saw mills were closed, there was less value adding to forest products and the RFA subsidised FT with \$76 million of taxpayer funds. At the same time, the price FT received from woodchip timber nose-dived from \$13.60/t to less than \$10/t. 400 jobs were lost in the processing industry between 1997 and 2000 and have continued to be lost as increasing percentages of unprocessed materials have been exported.

Beekeepers have seen their precious leatherwood resource liquidated and it and specialty timbers exported as a low value high volume product or burned on the forest floor.

To make matters even worse, fire resistant temperate mixed eucalypt and rainforest have been replaced by fire prone even aged, even height plantations.

The RFA has seen the destruction of many farming communities, such as the one I grew up in at Preolenna and Meunna. This has resulted in the loss of productive land, the loss of jobs and the loss of communities of people. They were lost in part to the RFA but also to the market distortion of Managed Investment Schemes, invented primarily as tax minimisation schemes.

The RFA has resulted in continued social conflict over extractive and non-extractive uses of the native forest estate. On the one hand we have those who want to lock the forests up for clear felling behind locked yellow gates; on the other hand we have those who want the forests protected the their myriad of benign yet jobs rich activities and the protection of their environmental and carbon and climate values. The community was assured the RFA would protect old growth forests and resolve conflicts over logging. Instead, the definition of old growth has been debased by FT to maximise the amount that can be logged. The RFA has been used to maximize benefits to the industry and minimise conservation benefits. It has locked in unsustainable practices that have serious consequences for conservation and environmental values.

The RFA was meant to result in increased levels of value adding of the timber resource. One only has to look at the ports of Burnie, Bell Bay and soon to be Hobart to see where the saw milling jobs and bee keeping jobs have gone and are going. We are exporting whole logs, both soft and hard wood, by the millions, some even in containers to presumably attract subsidies under the freight equalisation scheme. These products are being exported in unprocessed form to provide overseas jobs at the expense of local jobs. For most of the time the RFA has been operating, logging rates have increased, jobs numbers have decreased and forestry as a percentage of GSP has fallen dramatically. At the same time, the percentage of logged forest deemed "waste" is, at over 80%, considerably higher than any other country. The RFA has clearly resulted in waste and the squandering of a valuable resource.

The RFA was a bad deal for Tasmania last century and will be an even worse deal as we move through the 21st century. It needs to consigned to the dustbin of history.

Some more specific points

In Tasmania, a forestry operation that is undertaken under an RFA is NOT required to obtain environmental approvals otherwise required by the Environment Protection and Biodiversity Conservation Act (EPBCA), nor to protect rare and threatened species listed in the CAR Reserve System. When a harvesting plan is submitted for approval in Tasmania, often any assessment of environmental values is cursory at best and the certifying officer often has very close links with the harvesting operator. It is ludicrous that the very activity which has the greatest likelihood of causing environmental damage is exempt from national environmental laws.

Approximately 15% of global greenhouse gas emissions are a result of deforestation. Tasmania has some of the most carbon dense forests in the world, with forests in the north, Tarkine and south sequestering up to 800 tonnes/ha of above and below carbon. With a regime of harvesting and hot regeneration burn, the majority of this carbon is quickly converted into gg emissions. In Tasmania, over 80% of a harvested coupe is considered “waste”. The new plantation/forest can only sequester around 10 tonnes/ha/year, meaning the time taken to replace the carbon alone is around 80 years. Unfortunately, we do not have that much time to act on climate change. The time is quickly approaching when places like Tasmania will be paid for the carbon value of their forests – the forests will be worth more standing, just for their carbon value.

Habitat loss and its fragmentation and degradation from native forest logging has a massive impact on biodiversity. Logging practices in Tasmania under the RFA and harvesting plans, and the intensity of logging have been disastrous for biodiversity. Biodiverse native forest is often replaced with a monoculture plantation and even coupes left to regenerate naturally seem to be managed primarily for their commercial extractive values.

The RFA has resulted in an increase in native forest logging due to the removal of all government controls on the export of raw materials from native forests. It has also meant a huge loss of biodiversity because it has failed to meet JANIS criteria for commercial forest types. The RFA was meant to deliver a comprehensive, adequate and representative (CAR) reserve system with 60% of pre-European old growth forests, 15% of forest communities and 90% or more of high quality wilderness protected. State governments and agencies were given massive handouts to action this. These conditions have not been met in any of Tasmania’s eight bioregions. Commercially valuable trees ie big trees have been overcut at unsustainable levels in all bioregions. In addition, replacement of native old growth forest with plantation has been largely funded by taxpayer subsidies, especially from the Commonwealth government.

The RFA has failed primary producers. State owned native forest was given away at a loss, driving down the value of native timber owned by farmers. Many farmers were caught up in the MIS scams because their land was needed to grow the trees on and they were promised unrealistic returns.

The State government and timber companies could not get internationally recognized certification because of a lack of ecologically sustainable practices and even invented their own certification called the Australian Forestry Standard (AFS). This fooled some markets for some of the time until the extent of the environmental damage caused by logging could be no longer hidden.

The RFA was meant to protect a minimum of 15% of all forest types, yet boundaries seem to have been drawn based on access to commercial forest types rather than on ecological grounds. For example, most major commercial species are underrepresented in reserves. E regnans, the largest flowering plant in the world, has been exploited and wood chipped at alarming rates, with less than 10% of the original cover protected in reserves. A large percentage of protected E regnans is in streamside reserves, which themselves can be logged.

Some parts of the country have moved away from RFAs and towards a forest industry which is plantation based. It is interesting that these industries have become more sustainable and community conflict over forest use has largely disappeared. I have recently visited Pemberton in SW Western Australia. This community has largely moved away from a reliance on native forest logging and is thriving with a focus on tourism, agriculture, fine produce and plantation use. Where RFAs remain in effect, they fuel community division over the management of native forest. RFAs entrench conflict and encourage the old ways of doing things. They encourage waste and inefficiencies and forestry operations conducted under RFAs continue to require taxpayer subsidies, money that should be going into health, education and a diversified economy.

It seems clear to me that a forest industry operating under an RFA will struggle to obtain internationally recognised certification for its timber products. Forest operations are not conducted in accord with worlds best practice; carbon values are not considered; waste is endemic; and harvesting is exempt from the EPBCA. Without FSC, the industry will not gain a social licence and markets for products will continue to diminish. This will force the industry further down the production of low value products such as the burning of native forests in furnaces to produce energy. This will increase the environmental costs, increase community conflict and build buyer resistance for the purchase of the energy.

The production of bioenergy from native forests should be ruled out. Besides its other costs, it will be bad for climate change. The carbon equation for burning native forests in furnaces is as bad as burning coal. The other environmental costs are worse. Native forests have a huge carbon value and their value as carbon sinks needs to be considered in all management decisions. They accumulate carbon for centuries. Native forest biomass is not “waste”.

The RFA provides no mechanism for loss of forests from natural disasters such as wild fire. This results in overcutting and unsustainable practice.

Conclusion

Simply “Extending the Tas RFA” as if nothing has changed over the last 20 years is irresponsible. We need to learn from the failures of the last 20 years. We need to incorporate evidence and new findings into natural resource management in Tasmania. We need to take into account the impacts of climate change on our native forests and their value as carbon sinks and climate change mitigators.

We need to look at all the values of our native forests, not just consider their extractive values. We need to look at the value of the tourism industry; to look at species under extreme pressure due to habitat loss and modification such as the wedgetail eagle, the fw crayfish and orange bellied parrot.

A complete overhaul of the RFA is required. It needs to be scrapped and replaced with something more relevant and appropriate to the 21st century. This needs to include an analysis of the economics of native forest logging and the need for internationally recognized certification for native forest products. RFAs should not be key drivers of species extinction as they are now because they entrench native forest logging. Not only is this loss making but it fails to consider other key forest environmental values.

Wanting to extend the RFA is not based on any evidence or data – it can only be based on ideological grounds.

Tasmania has what the rest of world wants to see but what the rest of the world is losing or has lost. Why would we want to become like the rest of the world when our future depends on a brand the rest of the world wants to see?

The absurdity of the RFA is currently on display in coupes scheduled for logging in the Tarkine. The clear felling of two coupes in the Frankland River area has been delayed because of nesting wedge tailed eagles. FT has declared it will log the area after the chicks have left. This is also prime habitat for the FW lobster. The juveniles rely on undisturbed, even temperature, silt free water to survive and live in the streams of these forests. These forests also provide refuge for some of the last DFT disease free populations of Tasmanian devils. What sort of madness would allow this to occur in the 21st century?

Only a Regional Forest Agreement.

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