

6 July 2019

Dear RFA Consultation Committee

Please accept my submission on renewal of RFA's as set out below:

I submit that all 5 Regional Forest Agreements currently approaching expiry are not renewed for the reasons set out below.

I submit that there be a wide ranging independent inquiry into the system of RFAs, to investigate why such massive damage to the environment, water supplies, bush fire resistance, carbon storage is able to be inflicted at huge financial loss to the Government. The inquiry should include all dealings between logging companies, the CFMMEU and Government representatives.

I submit that the Government act to neutralise the 'jobs vs environment' clash by implementing a strategy to transfer jobs from unsustainable forestry practises, to sustainable industry such as plantation forestry and renewable energy projects.

Where such projects do not provide alternative livelihoods, I submit that individuals (excluding companies) are supplied a living wage until re-employment.

If environmental values including water supplies and carbon storage are applied to native forests, the cost of employment transition schemes could easily be covered by the cessation of these losses caused by RFAs.

Logging under RFA's must not continue, as they are not subject to national environmental laws.

None of the Victorian RFAs have met their objectives. Numbers of forest-dependent species listed as threatened continue to rise, and forest health is declining and will only get worse under climate change. Even the native forest industry is stagnating and in decline as their main resource runs out or is reduced through landscape-scale fire.

The so-called 'mandatory' five-yearly reviews do not even cover contemporary issues and are largely a tick box. They are retrospective exercises that cover the period of implementation of the RFAs between 1 July 2009 and 30 June 2014; well in the past.

Some reasons why Regional Forest Agreements have failed

- **Obsolete and out of date** – Many of the RFAs standards for the protection of ecosystems fall below international and national benchmarks. The agreements do not even mention climate change and its potential impacts.
- **Threatened species and ecosystems** – In 2015, mountain ash forest, one of the key target species for logging, was listed as critically endangered on the International Union for the Conservation of Nature (IUCN) Red List of Ecosystems. The Leadbeater's possum has been up-listed to critically endangered, and the greater glider added to federal and state lists as vulnerable to extinction. While the RFAs have been in effect in East Gippsland, populations of the greater glider have declined by 50 per cent in that region.
- **Ignore fire impacts** – RFAs ignore the successive or cumulative impact of bushfire, even though there have been extensive fires in the last 10 years.
- **Ignore other forest values** – They do not recognise, include or account for non-wood forest values (such as water, ecosystem services, recreation and tourism) that are contributing significant sums to the state's economy, and could contribute further.

- **Ignores their own previous reviews** – Recommendations relating to improved threatened species outcomes, from the previous RFA five-yearly review in 2009, have still not been complied with.
- **Unjustified special treatment for native forest logging** – Most industries have to follow the law, yet RFAs ‘turn off’ national environmental laws. The *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) is the main piece of federal environmental legislation, yet the *Regional Forest Agreements Act 2002* provides that RFAs, and by extension the native forest industry, are exempt from the EPBC Act.
- **Stifles innovation** – The method of harvesting native forest, clear fell logging, has not changed significantly in 30 years and has a dramatic impact on the native habitats and drinking water production. The amount of saw timber used in construction has dropped dramatically and supply is shaky, to the point that the Victorian Government had to buy out the main native hardwood sawmill in 2017.

The Western Regional Forest Agreement

The Western Victoria Regional Forest Agreement should have been phased out after the historic decision by the Bracks Government to create the Great Otway National Park in 2005, which largely ended broad-scale commercial logging in the area. Yet the agreement still exists and is still part of the current review.

Even the last independent review in 2010 recommended that the Western RFA be cancelled, but as recently as mid-2017, revised ecologically-damaging logging plans have been released for targeted logging of woodlands right across the west. This includes around the Grampians, Wombat forest near Daylesford and Mt Cole west of Ballarat. Key features of this plan include:

- Will target around 60 areas of state forest and take place in areas known to harbour more than 20 threatened native animals and 14 threatened native plants
- Across western Victorian forests, 70% of the area targeted for logging contains native vegetation types that are either endangered (19%) vulnerable (11%) or depleted (40%). In the Horsham Forest Management Area 54% of the vegetation is endangered.
- Threatened species have been found either within or near 33% of planned logging coupes, even higher in some regions.

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