

To whom it may concern

I write to have you consider my thoughts about the prospective roll-over and resigning of the Regional Forest Agreements (RFA).

First, I do not believe that your aspirations to 'modernise' them are sufficient or adequate. In keeping with the original tenets of the agreement itself, the RFA's must maintain responsiveness to new information and regular monitoring of their effects on biodiversity. I have strong doubts that these tenets have been honoured. Were they to do so, up-to-date science and research of the condition of decline of the State's biodiversity, habitat loss, climate change, and the species extinction crisis, would result in the State government abandoning the RFA's.

Second, it would seem prudent to make public the results of the stipulated RFA milestones (as contained in the RFA – Attachment 4), their audits and reports. Such transparency may fully service the underlying principal upon which the agreements were made: a). that they are responsive to new information and b). engaging of the public, inviting public comment on the performance of the agreement. The State of Victoria committed to these audits and reports being undertaken annually for the first 5 years, then every 5 years for the duration of the agreement. If these conditions were adhered to, and the information exists, it might assist the public in providing informed feedback as to their success or otherwise.

Third, they are founded on the white man's ideology: that economic prosperity is gained through exploitation of natural resources. Such a premise does not predicate a sustainable economic model, but rather the temporary illusion of economic strength. Borrowing down on our children's rights (for a healthy, resilient, intact, functional and stable environment and its life sustaining ecoservices for their future prosperity) to live in a temporal state prosperity in the here and now, is at best short-sighted, and I believe our children would deem a self-serving and careless expression of stewardship. It might pay to ask them.

Fourth, both documents are speculative on their estimates of the acceptable rate of loss of biodiversity due to extractive industries. Who pays that price if they are wrong? Current species endangerment and extinction is subject to a lag effect.

My contention is, that combined, these issues would mean that the roll-over and resigning of the agreements, is tantamount to the Victorian State Government and the Australian Federal Government agreeing to '**manage a line of decline**' of biodiversity and ecological values across the State. Actions for 'net loss' seems to be tolerated, whereas action for 'net gain' non-existent. Slowing the rate of decline only pushes the costs of remediation and restoration onto future generations. This in my mind is not responsible management

The terms used throughout many Federal and State Government strategies and policies, terms like 'responsible management', 'protection', 'conservation', and 'sustainability', cannot serve two masters. Their application to the environment cannot juxtapose their application to extractive industries. Applying them to one must implicate the decline of the other. Jobs and innovation can be created, biodiversity cannot be.

I have read the following documents in detail. **The Regional Forest Agreement** (1998); **The JANIS report** (1997) ; **Australian Government Biodiversity Policy Consultation Draft**. Commonwealth of Australia (2011) Department of Sustainability, Environment, Water, Population and Communities; **Protecting Victoria's Environment – Biodiversity 2037**: The State of Victoria Department of Environment, Land, Water and Planning (2017); **Australia's Biodiversity Conservation Strategy 2010–2030**: Prepared by the National Biodiversity Strategy Review Task Group convened under the Natural Resource Management Ministerial Council. Commonwealth of Australia (2010); **Climate change impacts on Biodiversity in Australia**: Biological Diversity Advisory Committee (2002). environment.gov.au

Within and between these documents, I observe an alarming incongruity between the full acknowledgement by both Victorian State and Federal Governments, that Victoria's biodiversity is in peril (not with standing the unknown effects of climate change), and the paucity of strategic policy and actions to remediate this crisis at best, and the ongoing intentional elimination of essential habitat for our declining flora and fauna at worst.

I conclude that as they stand, the RFA's and the JANIS report on which they are based, are **out of date, flawed, deficient, misleading, inconsistent**, would appear to have **not fulfilled any of the agreed milestones**, and accept the status quo conduct that results in **net loss and a line of decline**.

Yours sincerely

██████████

██████████ Ballarat Environment Network Inc. ██████████