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To: KENS-373-ForestInfo
Subject: Comments on Period 3 RFA Progress report

Comments by Julieanne Hilbers, PhD

Threatened species

- Logging and burning are major disturbances in the forest and put more pressure on endangered and threatened species. They lead to the direct loss of habitat. Few activities are undertaken before or after these events to protect species. DPAW advise that they rely on animals being able to 'move' out of an area to survive.
- Biodiversity is greater in protected areas. 15% more individual plants and animals and 11% more species inside than outside protected areas. (Reported in www.theguardian.com/environment/2016/jul/28/biodiversity-greater-inside-earths-protected-areas-study-finds).
- Australian research found protected areas contribute to the stabilization or recovery of threatened species compared while there was little empirical support for other conservation approaches. Taylor et al. 2014b
- Logging reduces connectivity of habitat to support species migration and reduce interbreeding .

Industry

Logging is not the optimal use of public native forests economically, environmentally or socially. A commitment to stimulate regional industries, including the profitable plantation industry, adventure tourism and recreation and forest management for biodiversity, water and carbon outcomes offer better opportunities for regional jobs and revenue.

Currently logging at an economic loss in Western Australia. See Swann, T & Browne, B (2016) Barking up the wrong trees: WA's Forest Products Commission (FPC) and the performance of its native forestry

This is the summary from this report

The Forest Products Commission (FPC) is a statutory body wholly owned by the Western Australian government. Its primary function is to conduct forestry activities on a commercial basis in state-owned forests, including softwood plantations, sandalwood and native forests. The FPC is responsible for most of Western Australia's (WA) native forestry, which occurs in the state's South West (SW) forests. The SW forests of WA lie within one of the world's 36 Global Biodiversity Hotspots and include jarrah and karri forests found nowhere else. While some areas are off-limits, logging and forestry operations continue in other areas. Native forestry in the SW forests is a small part of the overall WA forestry industry, and one

that has seen declining production and quality. WA forestry is dominated by the growing output from plantations. While the FPC has a primarily commercial function, it has struggled to make a profit over its 16 years of operation, with losses in many years. Around half of the accumulated profit since inception is accounted for in an unusually high profit in 2016, a result driven almost entirely by sandalwood. Native forestry posted a loss for the fourth year in a row. Government contributions to the FPC have exceeded profits and far exceeded dividends. To 2015 FPC paid just \$19 million in dividends, an average of 0.45% of equity. Yet the WA government has provided numerous payments to the FPC. The Annual Reports show net cash payments from the government of \$111 million to the FPC. By comparison, the FPC's accumulated net profit is \$45 million. The WA government has made numerous 'equity injections' to the FPC. One large equity injection in 2012 left the FPC without its former loans to WA Treasury. Since the WA government wholly owns the FPC, this is equivalent to a debt write-off. Net of equity injections, equity in real terms has declined substantially since 2003. There have been other forms of government assistance. The native forestry division has benefited from the government support to the FPC. Despite this, it has seen profits decline to low levels over the past decade, and net losses over the last four years totalling \$34 million.

Barking Up the Wrong Trees 2 This trend has been associated with:

- Declining production volumes;
- Declining quality, with an increasing majority of production going to chiplogs, firewood and charcoal, and other lower quality products;
- Declining recovery rates for turning sawlogs into sawn timber, which are well below those of other states;
- Declining yield of sawlogs per hectare of native forest logged.

The FPC values its forests as assets based on expected cash flows, considered purely as an asset for forestry, and changes in asset values are booked as a profit or loss. Nearly all of the recorded increases in forest values have been due to changes in accounting methods. Following these changes, forest value and profits have both declined. The value of native forests has declined by a third since 2012 and in real terms they have lost nearly half of their value over the last decade. The challenges faced by the FPC in native forestry are found nation-wide. State-owned companies, often heavily involved in native forestry, have been posting losses as they struggle with numerous structural changes in forest products markets and decline in quantity and quality of logs. The poor and deteriorating performance of FPC native forestry raises concerns about the employment it provides. Native forestry employs relatively few people in WA, here estimated to be between 170 and 330 people. There are further jobs in sawmills processing FPC native sawlogs, estimated here at 130. For context, total employment in the state exceeds 1.3 million. Forestry employment has declined over the past 15 years, while state-wide employment has grown substantially over the same period. FPC native forestry is now in decline and running at a loss, creating a need for a transition plan. Such a plan would include forest product substitution – for example, using existing alternatives for lower quality material and plantation logs for structural purposes. It would also take advantage of the alternative economic uses of the forests – for example tourism, carbon abatement, wildflower harvesting and honey production. Combined with the environmental implications of continued logging operations in the unique SW forests of WA, there are strong arguments for a transition out of native forestry. Given alternatives, the forests are worth more to the state left standing. The relatively few workers that would be affected could be assisted with a transition plan. (end of summary)

Additional considerations

- The difficulty in combining adequate protection for forest species and ecological communities is also highlighted by the number and severity of breaches by contractors.
- Contemporary logging practices are highly mechanicalised leading to spread of dieback, weeds and compacts soil.
- Glyphosate is used in silviculture (poisoning) practices. The International Agency for Research on Cancer (WHO) has declared this as 'probably carcinogenic to humans'. (see www.iarc.fr/en/media-

centre/iarcnews/pdf/Q&A_Glyphosate.pdf) This is based on 'sufficient evidence' on animals. The use of this product or similar in forests is contrary conservation aims.

- The savings by ending native forest logging could be used to redirect other industries, rehabilitation (gravel pits, landings, unwanted logging roads), weed and pest control and the employment of more rangers.

Stream Reserves

- In practice there is a consistent under classification of stream reserves. There is no consideration of the impact of climate change. There is a need to have more stringent criteria and monitoring.

Research

- Apparent lack of empirical evidence to drive practices. Lack of peer reviewed science based studies or trials before implementing large scale actions. Fire management practices is an example. Our practices are not based on evidence (<http://theconversation.com/new-modelling-on-bushfires-shows-how-they-really-burn-through-an-area-63943>)
- Lack of consideration of climate change as an added pressure on landscape and species. Australia is a signatory to the Paris agreement and all government plans and policies need to be reviewed in light of these targets.
- As the WA Chief Scientist said at a symposium earlier this year, "the South West is at the fore front of climate change". How is the impact of decreased rainfall being considered on growth rates, disease susceptibility, frequency and intensity fire etc. Forests are a key source of carbon. If we do not have a healthy planet this will lead to significant public health issues (see www.public.health.wa.gov.au/cproot/1510/2/Health_Impacts_of_Climate_Change.pdf)
- We need to reassess forests (eg habitats, water reserves, canopy cover etc) a minimum of every 5 years in response to disturbances and climate change.
- Terms such as 'old-growth' are no longer suitable as most forest is now impacted upon by logging, farming and other activities. A new classification approach is required. One that takes into account recovery rates for forests. There are good examples in the South West of high quality forests which have regenerated after having been left alone for 100+ years.
- No pre-disturbance base line on Forest check or other databases such as CAPAD
- There is no published evidence for the use of silviculture in WA forests as a way of managing fire or water retention. This research has only just commenced. It is still a theory. It should not be influencing practices before a minimum 20 year+ trial.
- The KPI's as reported in forest management plans in the main are vague and are process as opposed to outcome driven.

Heritage

- No evidence of local assessments of heritage values being undertaken before undertaking logging.

Community engagement

- The timing for seeking input, length and presentation of document does not make it easily accessible for people to understand or comment on.
- Community engagement appears to focus more on 'selling' the RFA rather than 'listening' or acting upon what the general community wants. The overwhelming majority of community members do not want the logging of native forests to continue. People would prefer to have these as places to visit and interact with for recreational pursuits. There appears to be inequity in whose voice is heard. Industry lobby groups despite being small in number have a greater say.

Additional evidence

I also table a report, Regional Forest Agreements in NSW: Have they achieved their aims (2016) by the National Parks Association of NSW. As RFA's are a national based initiative the findings of this report is directly applicable to Western Australia (despite NSW examples being used). I would ask that all contents of which are submitted by myself as comment.