

PROPOSED RENEWAL OF THE NSW REGIONAL FOREST AGREEMENTS, PARTICULARLY AS IT AFFECTS THE NORTH EAST COASTAL REGION OF NSW

This is a wider conservation issue, not specifically an orchid conservation issue, though broad-scale land clearing of native forest affects all the plants that grow there, so in that sense it is always an orchid conservation issue. This government action has been drawn to my attention and since it does affect orchids and there is a small window of opportunity for making submissions to the government, I raise it with you now. I have not read all the primary documents but there is a lot of material on the internet providing opinions and summaries.

First, a bit of background from Professor David Lindenmayer of ANU, in March this year¹:

“State governments are poised to renew some of the 20-year-old Regional Forest Agreements (RFAs) without reviewing any evidence gathered in the last two decades.

“The agreements were first signed between the federal government and the states in the late 1990s in an attempt to balance the needs of the native forest logging industry with conservation and forest biodiversity.

“It’s time to renew the agreements for another 20 years. Some, such as Tasmania’s, have just been renewed and others are about to be rolled over without substantial reassessment. Yet much of the data on which the RFAs are based are hopelessly out of date.”

The NSW Government wants to consolidate the four Integrated Forestry Operations Approvals (IFOAs) for the Eden, Southern, Upper and Lower North East coastal regions of NSW, into a single Coastal IFOA covering all regions, known as the Coastal Integrated Forestry Operations Approval (CIFOA). They think this is a good idea. Environmental groups such as the North East Forest Alliance² and the Nature Conservation Council of NSW³ do not, although they are expressing their concerns and making submissions, albeit not, perhaps, with much optimism. Nature Conservation Council of NSW chief executive officer Kate Smolski said in May 2018⁴:

“In February this year, environmental groups walked out of Government negotiations on native logging of public lands because we knew that the outcome of these negotiations was pre-determined. Since then, our position has not changed.

“The NSW Government has clearly stated that it is committed to continuing logging of our native public forests for decades to come, despite any lack of scientific evidence that current logging agreements have been successful in meeting their objectives or that logging is the best use of our forests in the 21st century. In fact, it is now abandoning any pretence of sustainable logging by proposing dramatic erosions of environmental protection to meet timber supply shortfalls resulting from historic mismanagement.

¹ Professor David Lindenmayer, landscape ecologist and conservation biologist – ANU - <https://theconversation.com/native-forest-protections-are-deeply-flawed-yet-may-be-in-place-for-another-20-years-93004>

² <https://www.nefa.org.au>

³ <https://calderaenvironmentcentre.org/?p=4463>

⁴ <https://calderaenvironmentcentre.org/?p=4463>

“Given this position, continuing to invest our time and resources in Government information and feedback sessions is futile. However, continuing to fight for the future of our precious native forests and wildlife is not.”

During the second reading debate on the *Forestry Legislation Amendment Bill* in the NSW Legislative Assembly on 6 June 2018, Ballina MP Tamara Smith (Greens) said⁵:

“It is kind of insane that we even talk about logging in native forests. The Greens do not support that. People were sold on that idea because they thought it would be heavily regulated and heavily monitored but from what we have seen that is not the case. All of the changes under this legislation are tied to aligning the Forestry Act to the draft Coastal Integrated Forestry Operations Approvals. So what we are seeing is a real opening up of integrated forestry operation agreements, which will make four of these—which stretch from far north New South Wales to Eden—into a single agreement. This raises a number of serious issues about conservation. The new logging regulations will recognise four different types of logging: selective, intensive, mixed intensity and alternate coupe. In reality, all of these types of logging are intensive. My colleagues in the other House will continue, but the Liberal-Nationals Government in New South Wales continues to be the worst environmental vandal we have ever seen.”

Important changes proposed by the CIFOA include:

- The removal of the need to undertake pre-logging surveys for most threatened species, including koalas.
- The removal or reduction of buffer zones around many threatened plant species.
- Permitting logging in stream buffer zones that are currently out of bounds for logging.
- Opening previously protected old-growth forest to logging by remapping these high conservation value areas to make up timber shortfalls.

For further discussion about the proposed changes see comments by NEFA’s Dailan Pugh in the *Nambucca Guardian* on 5th July 2018⁶.

The Government’s plans include a new 140,000 ha North Coast Intensive Zone from Grafton to Taree.

Threatened animal species in the North East coastal region include koalas, the Greater Glider, Eastern Pygmy Possum, Tiger Quoll, Powerful Owl, several frogs and the Swift Parrot. The Swift Parrot is listed as endangered in New South Wales and critically endangered by the Commonwealth, yet the proposed scheme describes them as “adequately protected”⁷.

The North East coastal region is also home to many orchid species, and they are referred to in detail in the North East Forest Alliance paper “Proposed Changes to Threatened Species Licences for Eastern NSW” dated June 2017⁸. These plants currently have a prescribed 50 or 20 metre protection zone around them. The protection zone is 50m for *Dendrobium melaleucaphilum*, *Bulbophyllum globuliforme*, *Phaius australis*, *Sarcochilus dilatatus*, *Sarcochilus fitzgeraldii*, and *Sarcochilus hartmannii*,

⁵ <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1323879322-102478>

⁶ <https://www.theguardian.com/environment/2018/mar/15/death-by-a-thousand-cuts-the-familiar-patterns-behind-australias-land-clearing-crisis>

⁷ See “Proposed Changes to Threatened Species Licences for Eastern NSW”, North East Forest Alliance. June 2017 https://d3n8a8pro7vnm.cloudfront.net/ncec/pages/19/attachments/original/1496411404/Proposed_Changes_to_Threatened_Species_Licences.pdf?1496411404

⁸ *Ibid.*

but under the proposed scheme these species will be deemed to be “adequately protected” so any of those plants which are in the areas to be logged will be destroyed.

I suspect *Bulbophyllum globuliforme* and the *Sarcochilus* species may not be in the path of the bulldozers, because of where they grow, and what they grow on, but *Dendrobium melaleucaphilum* might be. *Chiloglottis platyptera*, *Corybas dowlingii* and *Diuris venosa* currently have a 20m protection zone but under the new scheme will be regarded as adequately protected. *Oberonia complanata* has a 50m protection zone but that has been reduced to 20m exclusion zones around individual plants. *Diuris disposita*, *D. flavescens* and *D. pedunculata* will have individual protection with no stated exclusion zone, and without a protection zone I don't like the chances of a single plant or small colony of one of those species against a logging machine or the boot of a logging worker. All known individuals of *Cryptostylis hunteriana* will have protection, but there will be no protection zone. If there is no requirement for pre-logging surveys, new populations of this leafless, saprophytic orchid, which only makes its presence known when it flowers, will never be found.

Individual known plants of *Oberonia titania* will be protected, as will those of *Pterostylis elegans* and *Pterostylis gibbosa* in specific areas. Individual plants of *Chiloglottis anaticeps* known from existing records will be protected. Individual plants of *Pterostylis cucullata* will be protected but there will be no target survey. Individual plants of *Rhizanthella slaterii* will be protected but there will be no target survey for them, either, so they have virtually no hope since they are difficult to find even if you know they are there! *Caladenia tessellata*, *Diuris arenaria*, *Diuris* sp. aff. *chrysantha* (Byron Bay) syn. *D. byronensis*), *Diuris baueri* and *Genoplesium insignis* and *Thelymitra* sp. 'adorata' all currently have a 20m protection zone but no comment about any protection under the proposed scheme so presumably they are regarded as adequately protected and won't be considered in the logging zones. Then there is the current 20m/90% category, which includes *Sarcochilus weinthalii*, *Cymbidium canaliculatum*, *Dipodium pulchellum* and *Pterostylis nigricans*, now apparently regarded as adequately protected. Individual plants of *Diuris praecox* in McPherson State Forest are protected.

I do not know how many of those orchid species are actually threatened by the 140,000 ha proposed to be logged between Taree and Grafton. It might be that there are not many there at all, however on the Atlas of Living Australia there are two records for endangered species *Dendrobium melaleucaphilum* noted right in the middle of a big red patch on the map of the 140,000 North Coast Intensive zone.

The North East Forest Alliance's web site contains links to a number of useful documents which explain all the issues, and to this **video which I strongly urge you to watch**: <https://youtu.be/AN-SRJJG2E> The video summarises the issues succinctly and poignantly and if it leaves you feeling as angry as it made me feel, you may be inspired to tell the government what you think about their plans. Here is a North East Forest Association page with more links and some suggestions for submissions and a link to the site where submissions may be made: https://www.nefa.org.au/ifo_a_submission

The NSW government argues that the structure has to change because the current scheme was not efficient or effective. However in an Australia Institute paper in March 2016 titled “Money doesn't grow on trees: The financial and economic losses of native forestry in NSW”⁹, Roderick Campbell and Richard McKeon proposed that “Native forest logging by the Forestry Corporation of NSW generated losses of \$79m over the last seven years - discontinuing the practice could deliver significant benefits to the state of NSW”, and concluded:

⁹ <http://www.tai.org.au/sites/default/files/P209%20Money%20doesn%27t%20grow%20on%20trees%20-%20NSW%20Forestry%20Final%20Final.pdf>

“Forestry is not a major employer in NSW at a state level or at a local level. Native forestry is a fraction of total forestry employment, perhaps 600 people in the state representing less than 0.1% of the total workforce.

Native forest logging could end in NSW with minimal economic disruption and potentially substantial savings for NSW taxpayers.”

The proposed IFOA is only open for public consultation and comment until 5pm on Friday 13th July. Online comments can be made through this page on the Department of Planning and Environment’s web site: <https://engage.environment.nsw.gov.au/forests>

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9 July 2018