



# Jamax Forest Solutions

"your forest, our solutions"

www.jamaxforestsolutions.com

NSW Regional Forest Agreements  
Forestry Branch  
Environment Protection Authority  
PO BOX A290  
Sydney South NSW 1232

Dear Sir/Madam,

## Re: Submission on NSW Regional Forest Agreements Second and Third Five-Yearly Review

Jamax Forest Solutions remains committed to the principles of the RFAs and, despite the upheavals of the late 1990s when they came into force, believes that the RFAs have provide a degree of certainty to industry and rural communities since their inception.

The industry has a strong track record of innovation and is a champion for the environmentally sound, renewable and sustainable products that it produces. Without the surety of the RFAs and resource security, the NSW timber industry would be unable to invest in the R&D required to become world leaders in engineered wood products and other innovative hardwood timber products so much in demand across the world, as wood enjoys a renaissance.

At a time when the NSW timber industry should be well positioned to ride this new wave of enthusiasm for all things wood, it is disappointing that the RFA implementation report contains some major shortcomings and highlights a lack of progress on the milestone commitments within the RFAs:

1. NSW Government's role of monitoring, evaluating and reporting (MER) on the performance of RFAs is critical. In the absence of this function, there is limited evidence to demonstrate that the very forests values that the RFAs sought to protect are indeed being protected and that timber resources are being sustainably managed and supplied to industry.

That the reporting of the 2nd and 3rd reviews were seven and two years late respectively does not demonstrate NSW's commitment to the RFA objectives. It is as though the parties responsible for the reviews believed that the drying ink on the signature page of the RFAs themselves and the very creation of a comprehensive adequate and representative (CAR) reserve system solved the forest conflict and they could move onto the next issue.

It is concerning that whilst the NSW EPA, the lead agency responsible for the reviews, places such high standards on the work of those it regulates, it fails in its own duties to undertake the reviews on time and to inform the Commonwealth of changes to the FAs and IFOAs. These delays have also deprive stakeholders of the opportunity for their input into the progress of the RFAs.

2. The RFA implementation review identifies numerous instances where commitments were not met, though the review attempts to obscure the fact by labelling these failures as "achieved outside the reporting period" and "achieved in part". Both terms conceal the fact that the commitment was not met, on time and in full.

"we can see the forest through the trees"

The amalgamation of the results paints a favourable overall outcome of the review but masks the detail and potential impacts of those failures.

3. Whilst it is academic given that the 2<sup>nd</sup> and 3<sup>rd</sup> reviews were not delivered on time, it is unfortunate that the NSW Government chose to drop the Improvement component of the Australian Government's NRM Monitoring, Evaluation, Reporting and Improvement (MERI) framework. This is particularly the case with the RFA commitments aimed at delivering on socio-economic values and the sustainable management and use of the forests and provision of stability to industry (see Tables 1 below). The purpose of a cyclic MERI is to close the loop by seeking to improve the outcome and to subsequently evaluate the impact of the changed management action/decision.

Failure to close the loop and improve the potential outcome of any shortcomings has only been exacerbated by the failure to undertake the reviews in a timely manner.

**Table 1 – Government commitments that have not been fully complied with which directly impact on the NSW native timber industry**

| RFA clause or Attachment reference   | Commitment  | Claimed Status   |                  |                  |
|--|---|------------------|------------------|------------------|
|  |   | North East RFA   | Southern RFA     | Eden RFA         |
| NE – 108.11<br>S – 106.10<br>E – Att 5, 2 (g)                                  | NSW to maintain contracted supply for High Quality Large Sawlogs.   | Achieved in part | Achieved in part |                  |
| NE – Att 12, 22, 5th dot point<br>S – Att 8, 6, (e)                            | Additional FRAMES plot inventory measurements to be undertaken.   | Achieved in part | Achieved in part | Achieved in part |
| NE – Att 12, 22, 6th dot point<br>S – Att 8, 6, (f)                            | Annually monitor FRAMES performance through comparison of actual versus predicted volumes.  | Achieved in part | Achieved in part | Achieved in part |
| E – Att 11, 5<br>NE – Att 12, 24<br>S – Att 8, 7                               | NSW will establish and implement an ongoing FRAMES development program.   | Achieved in part | Achieved in part | Achieved in part |
| NE – Att 12, 15, 2nd dot point<br>S – Att 8, 8, 1st dot point<br>E – Att 11, 1 | NSW to commission an independent review of the enhanced FRAMES system applying to North East/Southern Region. Parties to commission and publish a review of the systems and processes, and the review of sustainable yield for the Eden region. | Achieved         | Achieved         | Not achieved     |
| E – Att 11, 2<br>NE – Att 12, 23<br>S – Att 8, 8, 3rd dot point                | NSW to undertake independent audits of Sustainable Yield and the Sustainable Wood Supply Strategy.  | Achieved in part | Achieved in part | Achieved in part |
| NE – Att 12, 19, 2nd dot point   | The hardwood plantation supplementation program<br>Establish plantations across LNE and UNE to supplement supplies of HQL and Veneer logs.  | Achieved in part |                  |                  |

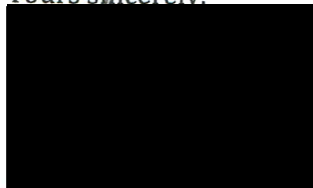
4. Despite the transfer of vast tracts of working forest to create a comprehensive adequate and representative (CAR) reserve system, there continues to be a lack of formal management

planning for a significant number of reserves and a distinct lack of monitoring of the impacts on the forest values of the change in management from active (State forest) to passive (National Park). There continues to be a focus on ecologically sustainable management of the remaining working forests but a lack of interest in what is happening in the newly created conservation reserve areas.

Furthermore, since the creation of the CAR reserve system, there has been no further work done of actually discovering what forest values actually existed in the original conservation reserve system before the RFAs. These areas continue to be a blank canvas and a potentially overrepresentation of forest values.

Thank you for the opportunity to provide feedback.

Yours sincerely,



Steve Dobbins  
BSc (Forestry), MIFA, Director, TimberNSW  
Owner, Jamax Forest Solutions