

Please attach the following **one-page summary** to your submission.

Comments on the Interim Report for the Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)

Summary

Name of author/organisation:

Southern Tas Branch Timber Communities Australia

Contact details:

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Date:

2 Aug 09

Which chapter(s) of the interim report are you commenting on?

Chapter 6 Forestry

Key points of submission

(please identify up to three main priorities or focal points of your submission):

1. Submissions are not reflective of general population. Most are from self interested groups that represent less than 10% of the National electorate. The vast majority of the population is satisfied with the EPBC Act and with the RFA
2. The reviewer has relied upon submissions from ENGO's and from scientific advisors. Both scientific advisors have links to a major ENGO, with one also a volunteer scientific adviser to that lobby group.
3. Unlike as claimed in the report, the Tasmanian RFA and Australia's forest management has been subject to open and transparent reporting. This reporting demonstrate significant environmental outcomes, and there is no need to alter the RFA or the EPBC Act

References (if possible, include a bibliography of any documents you may wish to make available)

Australian Electoral Office, Official Election results November 2007

<http://results.aec.gov.au/13745/Website/HouseStateFirstPrefsByParty-13745-NAT.htm>

RFA Review Sustainability Indicators for Tasmanian Forests 2001-2006

Public Land Use Commission, 1997, Background report part C Environment & Heritage Vol 1 Chapter 2 Biodiversity

Wilderness Society WildCountry Science http://www.wilderness.org.au/articles/wc_science

Confidentiality statement:

Note that all submissions unless otherwise indicated will be published on this website. You MUST indicate on your submission if you wish for your submission not to be published. If you wish for your submission to not be published please mark your submission as 'Confidential'. You should note that even if your submission is not published, the title of your submission and the name of the submitting organisation or individual will be published on the web site. If you wish to not have your details published please contact the Secretariat before making a submission. Contact details from of individuals making submissions will be limited to name, suburb and State/Territory.

Do you want this submission to be treated as confidential?

(please state 'yes' or 'no') NO

These comments contain personal information of a third party individuals. The third party individual **consents/does not consent** (*delete or strike out that which is not applicable*) to the publication of their information.

Sunday, 2 August 2009



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Independent Review of the EPBC Act

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**Southern Tas branch Timber Communities Australia submission to Independent review
of EPBC Act**

Members of the Southern Tas branch TCA are concerned that this independent review has been unduly influenced by self titled environment lobby groups, activist academics and scientists, and other groups, some in receipt of federal funding, that seek to undermine government policy.

They have been able to make the majority of submissions, (Environmental NGO 38% and individuals supporting their views about 12%), yet they only represent a minority view within the population. The vast majority of the population is satisfied with the operation and effectiveness of the EPBC act, but this is not reflected in the written submissions or verbal evidence sought by the Independent reviewer.

At the last Federal election the greens failed to achieve more than 8% of the House of Representative Vote¹, yet their view appears to be the dominant view considered by the independent reviewer.

Only well resourced lobby groups appear to have the time to make researched and articulate submission, but represent only limited interests.

Groups such as the Australian Network of Environmental Defenders Offices Inc (ANEDO) have been extensively quoted, but nowhere do we see reference to the fact that each office receives substantial funding from Government.

Academics have also had influence, with many not declaring their association with the Conservation political lobby movement

¹ Australian Electoral Office, Official Election results November 2007

<http://results.aec.gov.au/13745/Website/HouseStateFirstPrefsByParty-13745-NAT.htm>

² wilderness Society WildCountry Science http://www.wilderness.org.au/articles/wc_science

Perhaps this over reliance of the submissions of vested interest lobby groups and academics is seen in the fact that when the second five yearly review of the Tasmanian RFA was issued for public comment, only 27 submissions were made. The Tasmanian RFA has been the most controversial agreement for the last decade yet despite issuing two major reports addressing sustainability and its implementation the vast majority of Tasmanians appeared satisfied with the RFA and its protection of the Environment.

It is the view of members that contrary to the Independent reviewer's reliance of the claims of these academics and lobby groups, that "positive environmental outcomes are being achieved under RFAs."⁴

The Tasmanian RFA's open and transparent reporting shows the impact on two high profile threatened species:

Revision of the population estimates was undertaken in 2005 based on the then current knowledge of nest distribution and activity. There are an estimated 458 territories, representing 86 per cent of the pre-settlement number. Former territories have been lost due to habitat modification, urban development and disturbance from human activity. Activity data indicates that only around 50 per cent of territories are occupied by breeding pairs. By extrapolation, from the demography of similar species, the population is between 1200-1500 individuals with approximately half being mature-aged birds.

By extrapolation of the proportion of successful nests to the total known territories, (assuming randomness of disturbance levels), approximately 230 offspring are fledged each breeding season from the 255 active territories.⁵

Prior to the signing of the RFA, only 106 such territories were considered active⁶. This is an increase of almost 150% that has been ignored by the environmental submitters.

³ Brendan G. Mackey, Heather Keith, Sandra L. Berry and David B. Lindenmayer 2008, *Green Carbon ,The role of natural forests in carbon storage Part 1. A green carbon account of Australia's south-eastern Eucalypt forests, and policy implications ANU Epress*

⁴ Paragraph 6.114 Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999* Interim Report

⁵ RFA Review *Sustainability Indicators for Tasmanian Forests 2001-2006*

The RFA review also found that “the comprehensive, adequate and representative (CAR) reservation implemented under the RFA has resulted in an extended system of public and private terrestrial reserves. Within this framework, 1,465,000 hectares of forested land, or 47.0 per cent, of Tasmania’s native forests, are now protected. ... Of the 50 native forest communities, 35 have at least 15 per cent of their estimated pre-1750 extent protected in reserves.”

If this achievement is failing to provide “positive environmental outcomes” as alleged by submitters and academics, then perhaps Australia should revert to the IUCN target of only 10% of current biome!

In summary branch members consider there is no justification for the “way forward” recommendations when the claims of green lobby groups and academics who have failed to declare their ‘interest’ are rejected. Recommendations such as making each forest practice plan available for public comment will only create a frenzy of submissions from this well organised and funded minority, at the expense of people who earn their family income in a sustainable, clean, green and responsible industry.

These recommendations will undermine the certainty and confidence to invest in job creating, value adding and downstream processing activities presently well regulated by the RFA and the current EPBC Act.

George Harris
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⁶ Public Land Use Commission, 1997, Background report part C Environment & Heritage Vol 1 Chapter 2 Biodiversity