



SOUTH EAST FOREST RESCUE

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Comments on the Australian Government Offset Policy Consultation Draft

South East Forest Rescue welcomes the opportunity to provide comments on the Australian Government Offset Policy Consultation Draft. It is on the public record that South East Forest Rescue calls for indigenous ownership of all public native forest, a complete stop on logging of endangered ecological communities, complete transfer of wood product reliance to the plantation timber industry and salvage recycled hardwood timber industry, a single authority for national native forest stewardship modelled on the New Zealand example, and an immediate nation-wide program of catchment remediation and native habitat re-forestation. We stand by our commitment to native forest protection and take all opportunities presented to advocate for native forest justice. We thank the Government for consideration of our comment on this policy draft.

"6.1.5 In determining the success of an offset, proponents will be required to report data that allow for the performance of an offset to be evaluated. Obtaining such data is part of the ongoing management of an offset and the cost therefore lies with the proponent. Conditions will require that data be made readily available to the department and in a format that can be easily integrated into a departmental database."

This we see is the major flaw of the draft policy. For Offsets to be determined within appropriate and transparent governance arrangements we submit that there must be independent data gathering, evaluation and publicly accessible reporting for us to believe that these determinations of success or otherwise are credible. We concur that the proponent must bear this cost, but would propose that the proponent pays an Assessment Monitoring Trust Fund body that appoints and remunerates the independent assessors, so that there will be no risk of bias in these assessment reports.

"6.2.1 In keeping with the entire environmental impact assessment process under the EPBC Act, the determination of offsets is based on the latest scientific evidence and empirical data."

We submit there are grave concerns about the assurance of latest scientific evidence and empirical data due to our experience of similar assurances written into the RFA. There is no evidence that this has been fulfilled in regards native forestry management in the south east of NSW. Forests NSW has ignored scientific evidence regarding soil properties by not adopting outcomes of scientific findings. For example, the South Coast Environment Protection Licence has not been updated to include the findings of Tulau M.J., 2004, Soil Landscapes of the Narooma 1:100,000 Sheet interactive CD-ROM,

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Department of Infrastructure, Planning and Natural Resources, Sydney. This has resulted in systemic mis-classification of soil dispersibility and mass movement potential within logging areas.

Our research into Offset policy as promulgated in NSW shows that uptake to the concept has been lukewarm, and that much more legwork needs to be done to sell the concept as a viable method of ecological protection.

We look forward to seeing how the Australian Government progresses with these policy objectives.

Yours truly

Anthony Whan

for South East Forest Rescue

21/10/11