

NAFI
NATIONAL ASSOCIATION OF FOREST INDUSTRIES LTD

16 October 1998

Dr Neil Byron
Commissioner
Productivity Commission
Telstra Tower Level 28
35 Collins Street
MELBOURNE VIC 8003

Dear Dr Byron,

Thank you for the opportunity to discuss with you, Dr Gunasekera and Mr Mastoris, the reference on Ecologically Sustainable Development (ESD).

It is not possible for me to say that the Commonwealth environment bureaucracy has a good theoretical or practical understanding of the concept of ESD. While lip service seems to be paid to the concept, there is not much sign or a strong commitment to putting the concept into practice. It seems to me that the environment portfolio has interpreted its responsibility as being mainly to arbitrate on what *is* and *is not* ecologically sustainable. On the other hand, the environment portfolio seems to have very little interest in the *development* component of ESD. That seems to be left to others, particularly DAFF and state governments, with the environment portfolio mainly seeing itself as the source of ecological judgements.

In terms of a *practical* understanding of ESD, the Commonwealth's lack of involvement in land and resource management is a very great impediment to the acquisition or accumulation of a fund of practical experience. None of the 0.73% of the Australian land mass that is owned or managed by the Commonwealth government is managed for multiple purposes, and none of it is managed mainly to produce an economic return. I tried to develop some of these ideas in a submission to a statutory review of the Endangered Species Protection Act (1992) last year. A copy is attached for your information. Neither the reviewer nor the Department seemed to regard these constitutional constraints as a serious impediment to the Commonwealth playing a high profile role in endangered species management. I don't understand how they could fail to see it.

The other matter that I wanted to alert you to is the conduct of Australian delegations at quasi-technical international meetings dealing with environmental issues. I can't claim to have achieved much insight into what actually takes place at these meetings, but there are some signs that at CITES meetings, for example, Australia is lining up with "politically correct" positions adopted under ENGO pressure *to oppose* sustainable development options. The attached copies of a World Conservation Trust newsletter, and the press clipping recounting the views of Mr Graham Webb, are

amongst the disquieting signs that I am referring to. I am familiar, as I'm sure you are, with the way political issues can be shrouded in technical language, and take on the guise of scientific debate. You may not have the time or resources to investigate this, but I think it deserves investigation. I would be more confident that a "whole-of-government" approach was being taken by Australian delegations to these meetings if they were led by DFAT officers. Mostly they are not.

Against these largely negative observations of the Commonwealth environment portfolio's approach, I have to say that the submission made by Environment Australia to the Senate enquiry into the commercialisation of Australian wildlife didn't seem too bad. It was premised on a considerable amount of government regulation, but this is perhaps not surprising. The important thing was that it did not take the essentially preservationist line being strongly pushed by various environmental groups. A copy is attached.

What irks me more than anything else about the role that the Commonwealth pretends to in environmental matters is the almost complete absence of Commonwealth officials from the public debate about contentious issues. For the moment, greenhouse is an exception, but greenhouse won't become contentious until policy starts to bite.

Let me illustrate what I mean. In the area of forest management, the environment portfolio has invested major resources in "running the rule" over the policy and practices of state governments, in the RFA context. It has no legislative mandate to do this, and not very much expertise. It might reasonably be expected that at the end of this exacting, costly and protracted scrutiny, officials of the environment portfolio would be prepared to stand up in public and say something along these lines:

"We've had a good look at how the forests are being managed. We've had the co-operation of state governments and the assistance of a good number of scientists. We think the RFA for region XYZ gets us as close to sustainable forest management as our present understanding permits. If new facts emerge, we see no signs that anyone is going to be unreasonable about taking them into account. It is time for forest protests to stop, for protectors to go home, get jobs and leave rural communities in peace. If they don't we will have to invest more time in showing that their protest actions are unwise and unnecessary, and that the organisations which sponsor them are irresponsible and not deserving of community support".

We have had no success in getting environment portfolio officials involved in the RFA process to make anything remotely resembling a statement along those lines. They seem to think that their position allows them to pontificate behind closed doors whilst remaining aloof from the public debate that we find ourselves involved in on a daily basis. The two attached letters to one of those officials, taking up this issue, never drew a response, or a reply.

This is the possibly the main basis for my judgement that there is little sign of a strong commitment to putting the ESD concept into practice. Forestry has provided the

environment portfolio with an unrivalled opportunity to nail its colours to this mast, and it hasn't taken it.

Yours sincerely

Warren Lang
Deputy Executive Director