

Public submission

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Forest Industry Action Panel

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Jim Morrison, [REDACTED]

Thankyou for the opportunity to provide my views on the future of the forestry industry in NSW.

I have a background in Geography and Planning as well as Ecology with more than 30 years' experience in Biodiversity Planning. I think it is well past time that logging of our public native forests comes to an end and our timber products are sourced from sustainably managed plantations. Both Victoria and Western Australia have exited public native forest logging with Queensland soon to follow. NSW should follow the lead of these states for reasons outlined in my comments below

Sincerely Mr Jim Morrison

1 Sustainability of current and future forestry operations in NSW

I have been an adjoining landholder to a NSW Forest Corp State Forest on the Richmond Range NE NSW for more than forty years. During this time a number of harvesting operations have occurred. I have noticed a significant decline in forest health during this time, largely as a result of post logging weed invasion and the accompanying spread of Bell Minor Associated Dieback (BMAD).

I am particularly familiar with this very serious threat to forest health following more than fifteen years as Chairman of the Bell Miner Associated Dieback Working Group (BMADWG). During this time, I was involved in many State and Federally funded projects which attempted to determine the causes of BMAD and develop methods to bring about its prevention and control.

Ecologically Sustainable Forest Management. BMAD a case study.

The NSW forestry sector describes itself as a sustainable industry practising Ecologically Sustainable Forest Management. (ESFM). The inability to manage BMAD post logging in moist 'at risk forests' is just one example that belies any claims of Ecologically Sustainable Forest Management as espoused by Forest corps and its industry and academic proponents.

The BMAD problem has been known since the mid 1900's however it became well recognised as a serious problem in the late 1990's when a number of State Forest in NE NSW were heavily logged then handed over to National Parks. The development of management plans for the new parks identified BMAD as a serious threat. However, Environment group's calls for the BMAD issue to be acknowledged and addressed during negotiations leading up to the NSW RFA's in the 1990's were ignored. Following the signing of the RFAs, NSW State Forests were obliged to participate in a community driven initiative which led to the formation of the BMAD Working Group.

The BMADWG included representatives of relevant state government agencies including Forest corps, NPWS, DECC as well as representatives from universities, timber industry lobby groups, conservation groups and impacted private landholders

The BMADWG endeavoured to understand the causes of BMAD and develop methods to bring it under control. It was supported by several million dollars of State and Federal funding over fifteen years and achieved a number of positive milestones. However, it was handicapped by Forest Corp and industry lobbyists being unable to accept that logging played a major role in its development. This is despite the fact that in the late nineties a well-respected senior Forest Corp research scientist concluded that 'canopy disturbance' ie logging, was likely the primary causal factor in the development of BMAD. (Stone 1998)

Similarly in 2005 the NSW Scientific Committee determined 'Forest eucalypt dieback associated with over abundant psyllids and Bell Miners' (BMAD) as a Key Threatening Process. The committee made a conclusive finding that: *“Over-abundant psyllid populations and Bell Miner colonies tend to be initiated in sites with high soil moisture and suitable tree species where tree canopy has been reduced by 35 – 65% and which contain a dense understory.”*

Yet Forest Corp harvest plans in BMAD at risk and affected forestry compartments continue to exceed this canopy threshold for BMAD development and refuse to undertake the necessary appropriate, ongoing post logging weed management, thus facilitating its spread.

Most independent ecologists now agree that the resultant proliferation of understory shrubs, predominately lantana, following canopy disturbance (ie logging) provides enhanced nesting success and survival opportunities for the Bell Miners, while the abundant growth of new soft eucalypt leaf tissue provides enhanced resources for sap sucking psyllids .The sugar based secretions of the psyllids form a scale called a lerp which bell miners utilise as a food source. Their particular feeding habits allow them to remove the lerp without killing the psyllid which continues to produce lerps. Other birds which would kill the psyllids are driven away by the aggressive, territorial behaviour of the Bell Miners which also eliminate invertebrate psyllids predators such as spiders and wasps. The psyllids defoliate the trees which are successively attacked as new regrowth emerges, eventually leading to tree death.

The end result of unmitigated BMAD is total ecosystem collapse which is apparent across the northern parts of the Richmond Range and the Border Ranges. In badly impacted sites there are areas of 10-20 hectares where all susceptible eucalypts are now dead stags over a sea of lantana. There is no chance of natural regeneration as seed production is reduced prior to tree death. The most susceptible eucalypt species are Flooded Gum, Blue Gum, Grey Gum and Ironbark. The moist, productive, escarpment forests are particularly susceptible, although if unchecked the problem extends into drier forest types and additional eucalypt species.

BMAD has increased in distribution and intensity over the past twenty years. It extends from SE Qld to Victoria. There are at least 100,000 hectares of forest currently impacted in NE NSW alone. Through the efforts of the BMADWG it was declared a Key Threatening Process under NSW Legislation in 2005.

Throughout the BMADWG period of operation Forest Corps and Forestry industry reps on the Working Group doubted the views of their own senior researcher and continued to argue that logging was not the main cause, rather that it was likely related to reduced fire frequency and undertook projects to prove this hypothesis.

NSW Environmental Trust funding was used to undertake a number of adaptive management trials, including by Forest Corp to address BMAD at Mt Lindsay and Donaldson State Forests in NE NSW. Treatment of various plots included combinations chemical treatment, mechanical clearing and burning. They hoped to prove that logging could be carried out in these forests while also controlling BMAD. After more than ten years the trials failed to demonstrate that Forest Corp have an understanding of how to deal with this significant forest health issue. All of the plots where work was undertaken exhibited higher densities of lantana and bell birds than the control plots which were left undisturbed. Forest Corp did provide some useful information on costs of treatment for BMAD ranging from \$200-2500/hectare depending on severity.

A relatively recent independent, systematic literature review of BMAD once again clearly indicates that canopy disturbance is the primary causal factor in the development of BMAD.

(Silver, MJ and Carnegie AJ, 2017)

It is clear that productive moist sclerophyll forests at risk of BMAD are extremely difficult and costly to appropriately manage post logging, due primarily to weed invasion which requires ongoing active treatment over many years to overcome. This is almost impossible across rugged terrain, as in the escarpment forests. The cost of appropriate mitigation would far exceed the returns from logging. Many of these severely BMAD impacted forests are now considered beyond commercially viable management.

Yet Forest Corp continue to log BMAD affected and at-risk forests leading to a downward spiral in forest health. The reduction in regenerative capacity of our native forests cannot be considered to be either economically or ecologically sustainable.

Conclusion

Forest Corps have repeatedly over estimated the timber yields from public forest compartments requiring more intensive logging beyond sustainable yields to attempt to meet unrealistic timber supply agreements.

At almost every opportunity Forest Corp has successfully lobbied to weaken environmental protections such as stream buffers, slope limits and buffers for Threatened Species and Endangered Ecological Communities in attempts to meet unrealistic timber commitments.

The massive impact of the 2019-20 Black Summer wildfires which resulted in the loss of more than a billion animals, destroyed hundreds of thousands of hectares of Threatened Species habitat, severely impacted catchment values and water quality as well as reducing standing timber volumes has had little influence of the NSW Governments desire to fulfill unsustainable timber contracts.

It is well understood that extensive, intensive logging as now practiced, reduces stream flows, contributes to sedimentation and increases the risk of wildfires getting out of control.

It is well past time that the barbaric practice of logging our public native forests was brought to an immediate end and the timber resource be provided by sustainably managed timber plantations.

References

Silver, MJ and Carnegie AJ, 2017); '*An independent review of bell miner associated dieback*'. Final report prepared for the Project Steering Committee: systematic review of bell miner associated dieback.)

Stone, 1998, *Assessment and monitoring of decline and dieback of forest eucalypts in relation to ecologically sustainable forest management ;a review with case study*. Australian Forestry Vol 62 number1. Forest research & development division State Forest NSW.

2 Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values

The environmental values of our public forests and the ecosystem services they provide far exceed their monetary value in timber products.

They include catchment values through the mitigation of flooding, increased and prolonged streamflow from undisturbed forests as well as filtering sediment to provide cleaner water than from a catchment disturbed though intensive logging as the present regulations allow.

Our native forests are habitat to incredible biodiversity most of which is found nowhere else on the planet. There are a plethora of plant and animal species totally reliant on native forests to meet their habitat requirements. This is especially the case with hollow dependent fauna species, many of which are threatened due to a significant loss of tree hollows as a result of logging activities. The retention requirements for the number of hollow bearing trees to be retained in logging operations is an arbitrary number which has never really been scientifically tested to verify its adequacy.

The loss of enormous numbers of hollow bearing trees during the 2019-20 Black Summer wildfires renders those remaining fundamentally important to the ongoing survival of our hollow dependent fauna.

Recent research indicating that mature forests are less likely to carry crown fires and thus destroy canopy habitats than young regrowth forests indicates that our public forests should be allowed to grow old to lower the risk of canopy fires and help protect canopy dependent species such as koalas.

The carbon value of our forests and their soils is enormous and if left undisturbed by logging activities will continue to grow as regrowth forests mature. We could contribute significantly to address our climate mitigation commitments by immediately ending native forest logging and transitioning to a sustainably managed plantation resource.

While many people assume that Cultural Heritage is primarily about Indigenous values, our Cultural Heritage also includes non-Indigenous values such as Historic, Scientific, Social and Aesthetic values which also can qualify for protection under the NSW State Heritage Act.

Forest Corps often gives only 'lip service' to protecting Cultural Heritage Values in its efforts to meet unsustainable timber contracts. A good example of this can be found in the Harvest Plans for Cherry Tree State Forests compartments 3-6, as outlined below.

The Cherry Tree Road was formally recognized as part of an area of Regional Social value by the CRA Cultural Heritage Working Group during the Comprehensive Regional Assessment (CRA) in the late 1990's.

The response of Forest Corps to acknowledging and protecting this formally listed value is that a fifty-metre buffer be provided on each side of the road, as is indicated on the harvest plans. This at first glance appears an adequate measure of protection. However, their prescriptions within this 'buffer' allow for log dumps to be established along the roadside, but additionally up to fifty percent of the eucalypt canopy can be removed!

This is a prescription which offers no more protection than that of the surrounding harvest area.

Our forests of course hold special cultural value for first nations people who actively managed them until European arrival. Many traditional indigenous pathways traverse the forest estate, particularly along ridgelines as is the case with the Cherry Tree Road. Logging has recently been temporarily halted in the Cherry Tree State Forest by a native title custodian who claims it will cause irreparable damage to the indigenous values of the area. Forest Corps have opposed these claims.

To properly protect the environmental and cultural values of our public forest estate logging should be totally excluded and active, adequately funded restoration activities undertaken.

3 Demand for timber products, particularly it as relates to NSW housing, construction, mining, transport and retail.

There are some 400,000 hectares of plantations in NSW. They are predominately softwood but about 35,000 hectares are hardwood eucalypts.

The current demand for domestic timber products could be easily met from our existing plantation estate. However much of our hardwood and softwood plantations are currently exported as low value woodchips and some even as whole logs. If this timber were kept for domestic use there would be adequate resources to meet our needs.

Currently almost 90% of housing construction timber is already derived from softwood plantations. The construction industry makes extensive use of plantation sourced pine timber products due to low cost, workability, stability and lightness.

Alternative materials are now available to replace the diminishing need to utilise hardwood logs.

Telegraph poles are now preferred to be manufactured from composite fibreglass as unlike hardwood poles, they are resistant to fire and termites. Wharf poles are being replaced with concrete alternatives as are farm fence posts. Hardwood pallets are being replaced by recycled plastic alternatives. Recent developments in processing plantation pine through laminating can provide structural beams of similar strength to hardwood beams.

One of the highest value products derived from native hardwoods are tongue and groove flooring which is becoming prohibitively expensive for the average home builder. Alternative products such as bamboo provide excellent flooring while adequate tongue and groove flooring products could be manufactured from plantation hardwood. The quality of timber from our hardwood plantations could be greatly improved through better plantation silvicultural practices such as better matching of species to site conditions, early removal of defective trees, thinning rather than total harvest and extended rotation times before final harvesting.

If the export of low value woodchips and whole logs from our plantations was reduced, increased supply of plantation sawlogs would make it possible to implement an immediate transition out of public native forests and into a totally plantation-based sawmill industry in the State.

4 The future of softwood and hardwood plantations and the continuation of Private Native Forestry in helping meet timber supply needs

As outlined in the previous section 3 plantation forestry has a fundamental role to play in the immediate transition out of public native forestry to a 100% plantation-based industry.

Private Native Forestry has a role to play in this transition, however PNF regulations require significant changes to ensure it is undertaken on an ecologically sustainable basis.

The current assessments for PNF are merely a desktop exercise that requires no on ground surveys, unless the landholder wishes to challenge logging exclusion zones such as Old Growth or Rainforests provided in maps from Local Land Services.

Threatened species not recorded in Bionet can be ignored, despite the fact that there are very few records from private land and it is not in the PNF landholders' interest to list them. Similarly Endangered Ecological Communities apart from Rainforest are not highlighted in PNF approval maps. Slope limits for PNF approvals should be reduced from the current excessive 30 degrees and wider buffers on water courses and drainage lines mandated to protect catchment values.

The current regulations allow landholder ignorance as an excuse to destroy threatened species and their habitats.

To ensure appropriate protection of environmental values on ground surveys need to be undertaken by suitably qualified independent ecologist, followed by site specific prescriptions to adequately protect those identified values.

Landholders with High Conservation Value forests should be provided with adequate financial incentives to voluntarily protect these values in perpetuity.

The current situation with highly subsidised public native forest logging creates market distortions which results in lower returns from PNF than should be realised.

An exit from public native forest logging would allow better returns for private native forestry operations to provide specialty timbers until these needs can be met by improved plantation management.

5 The role of State Forests in maximising the delivery of a range of environmental, economic and social outcomes and options for diverse management, including Aboriginal forest management models

Following the cessation of public native forest logging in NSW S Forest Corps should have no role in the management of the public forest estate. Forest Corps should only be responsible to manage the plantation estate in a sustainable way and undertake plantation-based research and give advice to private plantation owners on productive sustainable plantation management.

A New State Government administrative body should be created to oversee restoration and management of the public forest estate for its diverse non timber values. Traditional owners should have a key role to play in this endeavour.

Training and employment opportunities should be provided to the wider community. Recovery actions should be developed and implemented for all forest dependent Threatened species and Endangered Ecological Communities as a priority.

6 Opportunities to realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks, including the greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests.

Our old growth forests include an enormous long-term storage of carbon in their vegetation and soils. Much of this is released through logging activities with minimal amounts providing ongoing longer term carbon storage in the few durable products such as flooring that are recovered. The overwhelming majority of carbon is lost to the atmosphere following the production of items such as woodchips and other short life timber derived products.

The disturbance of soils from logging operations releases considerable amounts of carbon to the atmosphere, which coupled with burning of crowns and leaves and the rapid breakdown of organic matter through drying out of ground layers amounts to a huge carbon deficit which would take centuries to replace. This is without considering the fossil fuel used in harvesting and transport.

The biodiversity values of old growth forests are well known. Trees with abundant large hollows provide critical habitat for a range of threatened fauna including a number of species of owls as well as endangered gliders species. Koalas find shelter from heatwaves and radiation from fires in the sheltered bases of large lower crown branches. The nectar resources of large trees support Threatened flying foxes and a number of Threatened nectar feeding birds.

Many of these critical habitat features across the landscape were lost in the 2019-20 wildfires accelerating the current extinction crisis.

Recent research has confirmed that old growth forests are much less susceptible to the impacts of wildfires compared to the younger regrowth forests, with less likelihood of running crown fires.

All of these beneficial attributes of older forests clearly indicate that there are many benefits of ending public native forest logging, restoring the health of regrowth forests and allowing them to grow old for the wide range non-timber value benefits they can provide.

Ending public native forestry logging will go a long way to meeting our climate and biodiversity targets. Carbon and biodiversity credits from preserving our public forests should not be traded with corporations intent on continuing to burn fossil fuels or destroying Threatened species habitat leading to perverse outcomes for our planet.