Public submission

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NATIONAL PARKS ASSOCIATION OF NSW

protecting nature through community action



12 October 2024

Hunter Branch

Secretariat Independent Forestry Panel Suite 15.02, 135 King Street SYDNEY NSW 2000

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Dear Sir / Madam

REVIEW OF SUSTAINABILITY OF FORESTRY OPERATIONS IN NSW

The Hunter Branch of the National Parks Association of NSW (NPA) appreciates the opportunity to contribute to the independent review of forestry operations in NSW. This submission is intended to complement the broader state-wide perspectives set out in NPA's principal submission.

NPA's mission is protecting nature through community action. Our strengths include State-wide reach, deep local knowledge, evidence-based input to policy and planning, and over 65 years' commitment to advancing the NSW protected area network and its professional management. We also provide outstanding opportunities to experience and learn about nature through our unrivalled program of bushwalking, field surveys, bush regeneration and other outdoor activities.

Sustainability of forestry operations (current and future)

Debate about the economic and environmental sustainability of the native forestry industry has waged for many decades. To date no outcome has been obtained that is satisfactory to all parties, and to the forests themselves. Current circumstances suggest that the impasse can no longer be allowed to continue, and that a permanent solution is required within the next 5 or so years.

As has been shown by repeated studies, the NSW native forest industry is operating on an unsustainable basis. While native forests are theoretically a renewable resource on the time scale of centuries, in practice the timber resource has been systematically over-estimated and over-allocated in response to commercial market pressures. The quantity and quality of the standing timber resource is now but a shadow of that which was inherited by the Forestry Commission of NSW upon its formation in 1916. To meet quotas and contracts, it is now necessary to extend "industrial" style logging into highly sensitive areas, causing significant habitat, hydrological and scenic impacts that will require decades of corrective action.

Aside from environmental sustainability, the native forestry industry is not economically viable for the NSW community, nor is it financially viable for the NSW Government. The economic returns generated, whether from royalties, profits, taxes, employment and associated multiplier effects, are insufficient to pay for the cost of maintaining access roads and other supporting infrastructure. Nor do they recompense the considerable externalities that native forest logging imposes beyond the forest itself. Examples include maintenance of public roads and bridges, scenic impacts, increased bushfire risk caused by forest thinning, spread of weeds, and reduction in streamflow.

It is not possible for the NSW forest estate to deliver the full range of ecosystem services under the present forestry regime. A decision should be made to transition the entire public forest estate to



nature conservation, recreation and tourism purposes. Permanent protection under the National Parks and Wildlife Act offers the most appropriate framework for ongoing management. The NPW Act provides a range of tenure categories to suit particular requirements in different locations, such as national parks, nature reserves, State conservation areas and regional parks. The Act also provides opportunities for indigenous management of reserves.

Future of the plantation and private native forestry industries

Closing the native forests industry does not threaten other industries that rely on timber products, as most applications can be supplied from plantation sources. Plantation timbers already provide more than 90% of the wood used in the building and allied industries. Softwood and hardwood plantations have the capacity to supply a wide range of products.

More investment should be undertaken to support the plantation industry. New plantations should only be established on degraded lands rather than through the clearance of currently intact native forests.

The future of private native forestry should be considered concurrently with decisions affecting the future of the public forest estate. If this is not undertaken, unacceptable practices currently occurring on public land will merely transfer to private land, which presently is even more poorly regulated than public land. The current regulatory dichotomy between public and private land should be removed and replaced by a single regulatory regime applicable regardless of land tenure. It should be specifically designed to promote the achievement of biodiversity, carbon storage, catchment protection, fire management, agricultural, scenic and other objectives.

Role of State Forests in delivering environmental, economic and social outcomes

The "highest and best use" of public native forests is no longer for growing commercial timber, but to provide a variety of "ecosystem services" that benefit the public at large, and which generally cannot be provided by other means. These include conserving biodiversity, geodiversity and supporting ecological processes, and providing ecosystem services such as clean water, soil protection, climate stabilisation and recreational opportunities.

The existing public native forest estate should be transferred to appropriate reserve categories under the National Parks and Wildlife Act, with provision made for Aboriginal joint management. The only exception should be State forest lands comprising legitimately established plantations. These should be retained under the management of the Department of Primary Industries.

Transitioning to native forest protection in the Hunter-Central Coast Region

The total area held under State forest tenure (including flora reserves) within the wider Hunter Central Coast region is in the order of 187,000 ha (see Appendix). The lands encompass a diversity of forest types, and of varying ecological significance and condition. Moist forest types on elevated lands are likely to be of exceptional importance in the future by providing 'climate refuge' habitat and landscape connectivity under a warming climate. The transition from short-term timber production to long-term forest protection will require an integrated package of measures.

- A plan will be needed for the orderly and progressive transfer of State Forests to management under the National Parks and Wildlife Act. This should be supported by a suitable assessment process to determine the most appropriate reserve category for each State forest. Increased resources and investment will be needed to allow proper management, particularly for restoration works.
- Industry adjustment plans will be needed to re-skill timber workers for employment opportunities within the native forest protection industry.
- Measures should be taken to exclude inappropriate new development before State Forests are transferred, Notable examples include transmission lines and extractive industries.
- An effective regulatory system should be introduced for native forests on private land. This should be closely integrated with the private land conservation regime and the land use planning system.

Conclusion

The native forest industry has operated at a loss for many years. This represents a considerable opportunity cost, as the resources could be put to much greater community benefit by managing the forests for their ecosystem services. The value of the forests for biodiversity protection and as a store of carbon emissions greatly exceeds their value for timber production.

I can be contacted at

Yours sincerely

lan Donovan

Secretary, Hunter Branch National Parks Association of NSW protecting nature through community action

APPENDIX: State forests of the Hunter-Central Coast Region

NameArea (ha)LGAMcPherson SF6,142Central CoastOlney SF17,546Central CoastOurimbah SF3,586Central CoastStrickland SF465Central CoastWyong SF630Central CoastWatagan SF3,234Central Coast, CessnockCorrabare SF5,082CessnockHeaton SF2,449CessnockPokolbin SF13,889Cessnock, SingletonChichester SF (west)6,200Dungog	
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Chichester SF (west) 6,200 Dungog	
Fosterton SF 913 Dungog	
Masseys Creek SF 3,177 Dungog	
Mount Allyn FR 2,476 Dungog	
Awaba SF I,882 Lake Macquarie	
Avon River SF 5,214 Mid Coast	
Bowman SF 3,189 Mid Coast	
Bulahdelah SF 7,400 Mid Coast	
Chichester SF (east) 9,695 Mid Coast	
Giro SF 9,589 Mid Coast	
Mernot SF 4,320 Mid Coast	
Myall River SF 13,557 Mid Coast	
Nerong SF 2,396 Mid Coast	
Tuggolo SF I 3,690 Mid Coast	
Wang Wauk SF 8,369 Mid Coast	
Uffington SF 334 Port Stephens	
Wallaroo SF 3,469 Port Stephens	
Putty SF 22,130 Singleton	
Barrington Tops SF I 1,802 Upper Hunter	
Stewarts Brook SF 2,130 Upper Hunter	
Tomalla SF 2,090 Upper Hunter	
TOTAL 187,045	