

Public submission

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Independent Forestry Panel

By email: nswdpie.tfaforms.net/f/IFP-MakeAnOnlineSubmission

RE: National Parks Association of NSW submission on the future of public native forests

Dear Panel,

The National Parks Association of (NPA) was formed in 1957 and sixty-seven years later we have 15 branches and over 20,000 supporters across NSW. NPA's mission is to protect nature through community action. Our strengths include state-wide reach, deep local knowledge, an evidence-based approach to conservation and respected advocacy for the creation and professional management of protected areas.

NPA welcomes the opportunity to comment on the future of the forestry industry in NSW, particularly in respect to those industry components involving public native forests.

NPA's long-standing policy is that the NSW Government should implement legislative and structural changes as soon as possible to end all logging and forestry related activities in public native forests. Those State Forests that contain native forest communities should be gazetted as National Park, Nature Reserve or State Conservation Area under the *National Parks and Wildlife Act* (NPW Act). This would enable title to be vested in Aboriginal communities under the Joint Management provisions in Section 4A of the NPW Act.

These changes will ensure that the NSW forest estate delivers essential ecosystem services such as clean air and water, protects cultural sites, landscapes and biodiversity, maximises the sequestration and storage of carbon and provides opportunities for sustainable recreational.

NPA appreciates being permitted to participate in the panel's recent focus group discussions. It is assumed that the scenario's presented by the consultants provide some indication of the scope of options under consideration by the panel and/or government. In that context there are three issues we would like to raise as part of this submission.

The first relates to the timeframe for a transition out of public native forestry. One of the scenarios posed a 4-year process. NPA suggests that the panel give serious consideration to the very poor outcome that an extended timeframe has generated for the Great Koala National Park (GKNP) in northern NSW.

For reasons that are still unclear the NSW Government chose to allow forestry operations to continue within the proposed boundary of the GKNP while park boundaries were being finalised and enabling legislation prepared. The decision not to apply a logging moratorium during the assessment process may have been predicated on the assumption that Forestry Corporation NSW (FC) would continue a 'business as usual basis'. The reality has been far

different, with FC drastically accelerating logging operations across the GKNP. Over the last 12 months more than half of all forestry activities in the northeast region of NSW have taken place within the GKNP, despite this representing less than 20% of the region's State Forests. The most benign interpretation is that FC wants to remove as much timber as possible before they lose access to the forests, the alternative being they are working to destroy their conservation values to avoid declaration as Protected Areas.

The GKNP example demonstrates that a protracted transition period will encourage FC into a final phase of reckless damage without regard to the future of the forests. It is imperative that the announcement of a decision to end logging in public native forests be accompanied by an immediate moratorium on forestry activities. NPA would recommend an implementation period of no more than 12 months.

The second issue arising from the focus groups is Aboriginal management of public forests. As noted above, NPA is very supportive of Joint Management under the NPW Act. This involves the transfer of title to Traditional Owners, lease back of the land to the Government and management under an Aboriginal Board of Management. It is NSW Government policy that all National Parks will transition to Joint Management.

Joint Management under the NPW Act parallels similar arrangements in the Commonwealth and other states and is a well-established model that fully acknowledges Aboriginal ownership. It provides control and employment opportunities for local Aboriginal communities while securing the conservation, recreational and public benefits associated with Protected Areas.

NPA is deeply concerned by alternatives such as those currently being discussed in Victoria, which appear to be thinly veiled attempts to continue to provide wood resource for the forestry industry. There is no need to devise a new Aboriginal management model for former State Forests, joint management already has a legislative basis with a governance structure that works.

The final issue was a strong impression that FC's practice of obscuring the differences between public native forests and the plantation sector is continuing to permeate thinking about the future of the industry. This is evident in questions that imply that the alternatives are or to continue the current mix of hardwood and softwood activities or have no access to any wood products.

To be clear, NPA strongly supports the continuation of a vibrant plantation sector. Our analysis of the evidence indicates that the plantation sector is profitable and currently provides more than 90% of all construction products. There are low environmental impact opportunities to expand the plantation sector, provided that new plantations are created through the restoration of previously cleared lands rather than native forest. Any gap in wood product availability can be addressed through composite materials and alternatives such as steel piles and concrete poles.

The practical effect of conflating plantations and public native forestry is to hide the excessive subsidisation, losses, declining employment and unsustainable environmental impacts of the public native forest industry. NPA's recommendation is that the panel treat the future of forestry plantations and forestry within public native forests as entirely separate matters.

From a governance perspective most effective means of separation would be to make legislative amendments removing FC from any involvement in native forestry in NSW. This would restrict FC to the establishment and management of plantations. Responsibility for regulating Private Native Forestry would remain with the Department of Primary Industry and the Environmental Protection Authority.

Our response to the panel's focus questions are provided below.

Sustainability of current and future forestry operations in NSW

Forestry activities in public native forests are contributing to escalating rates of habitat and species loss in NSW. The forest estate is now so reduced, fragmented and degraded that each new episode of clearing and damage threatens the viability of the entire forested estate. The forestry industry is not solely responsible for land clearing in NSW, nor the loss threatened species habitats, damage from mega fires or other impacts of climate change. However, the cumulative result of all this damage is the context in which the sustainability of future forestry activities must be assessed. In NPA's view NSW has long passed the point where forestry activities in public native forests can be considered environmentally, economically or socially sustainable.

It is worth noting that forestry activities include roading, modification of water courses and exposure and disruption of soil structure. The adverse environmental impacts range from habitat loss, reduced water quality, landscape scale habitat fragmentation, introduction of pests and weeds to reduced capacity for carbon sequestration and storage. None of these adverse impacts can be considered 'sustainable'.

The only viable option for a sustainable forestry industry is one based solely on plantations.

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

There is an unfortunate tendency to see the forest estate as an undifferentiated 'sea of green'. The reality is far more complex, with a vast array of different landscapes, ecological processes, plant communities, habitats, threatened and 'common species' across the forest estate. Each combination of habitats, species and ecosystems has its own unique biodiversity value, as do the cultural sites, stories and landscapes that have spanned the forests for millennia.

It is somewhat nonsensical to reduce the value of forests to list of natural and cultural attributes. The more important question is, 'how important is it to maintain the condition, integrity and resilience of our forests?' The answer is that it has never been more important to do everything possible to protect the remaining forest estate. Only full protection from the clearing and disturbance will allow the forests to deliver clean air and water, sequester and store the carbon our society continues to pour into the atmosphere, and provide a chance for forest dependant species to survive into the current century.

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

The vast majority of wood products can be sourced from plantations, including those uses where hardwoods are currently used. Continued access to relatively cheap hardwood products is no justification for the loss of native forests, especially as alternative products are already available for challenging applications such as wharfing, power poles and propping.

The low level of demand for boutique purposes such as furniture and veneers can be met through recycling and appropriately stocked plantations.

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

NPA supports complete reliance on softwood and hardwood plantations for the supply of wood products in NSW. Any expansion of the plantation sector should be restricted to previously degraded lands rather than relying on the clearing native vegetation.

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

The highest potential public purposes of public native forests are biodiversity conservation, the provision of ecosystem services such as clean water and air, and maximising the capacity of natural systems to capture and store atmospheric carbon.

The major and repeated breaches of environment regulations by NSW Forestry Corporation model demonstrates that it provides a totally unacceptable model for administering these public assets.

All State Forests that contain native forests should be gazetted as National Park, Nature Reserve or State Conservation Area under the *National Parks and Wildlife Act*. NPA supports these reserves being formally declared for Aboriginal joint management under the relevant provisions of the *National Parks and Wildlife Act*.

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.

Ecologically intact natural systems have a critical role to play in sequestering and storing atmospheric carbon, the primary driving of climate change. An intact, well-protected NSW forest estate has a major role to play in addressing these threats to our collective future.

While recognising the importance of carbon capture and storage, the lack of integrity in current carbon and biodiversity trading schemes inspires little confidence. Moreover, it would be entirely self-defeating if credits generated through the protection of public native forests were used to enable excess emissions by unrelated industries.

For these reasons NPA is not supportive of the application of either carbon or biodiversity market processes to public native forests.

Please contact me at [REDACTED] if you would like to discuss any aspect of this submission.

Yours sincerely,

[REDACTED]

Gary Dunnett
Chief Executive Officer
National Parks Association of NSW
protecting nature through community action

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