

Public submission

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The Independent Forestry Panel of NSW

<https://www.ipcn.nsw.gov.au/cases/2024/08/independent-forestry-panel>.

About the Author

My name is Alan Cole and I am a professional forester, graduating from the Australian National University with a BSc(FOR) after my first two years of my undergraduate studies being undertaken at the University of Melbourne's Agricultural Science and Forestry faculty.

Whilst working in Canberra as a Principal Consultant for GHD I undertook a MBA from the University of Canberra, in addition to formal studies in Occupational Health and Safety. I am a member of the Institute of Foresters Australia and a Registered Professional Forester. In the first year of my professional career, I worked for the WA Forest Department, since that time I have worked in the private forest industry. Now semi-retired I am currently working part time for a plantation company as well as managing a cattle farm in northern NSW.

Sustainability of current and future forestry operations in NSW

It is my understanding that the NSW native timber harvest is limited to one percent of the total area of State Forest each year.

"The areas available for renewable timber production were identified through the Regional Forest Agreements following a comprehensive regional assessment that set aside a comprehensive, adequate and representative reserve system. In NSW, the majority of public forests are set aside for conservation and about one per cent of State forests are harvested for timber and regrown each year."

Source: <https://www.forestrycorporation.com.au/operations/about-our-harvesting-operations/native-forestry#:~:text=In%20NSW%2C%20the%20majority%20of,timber%20and%20regrown%20each%20year>.

In addition to native timber harvested in State Forests, relatively small quantities of native timber are harvested on private land, either being sold to local sawmills or used on farm for buildings and infrastructure.

It is my view that this extremely low intensity of native forestry operations in NSW will be sustainable in perpetuity given the high standard of forest management practiced in Australia.

It should be noted that Foresters have been around for a long time:

JOHN, by the grace of God King of England, Lord of Ireland, Duke of Normandy and Aquitaine, and Count of Anjou, to his archbishops, bishops, abbots, earls, barons, justices, foresters, sheriffs, stewards, servants, and to all his officials and loyal subjects, Greeting.

Source: Magna Carta, 1215

There should be the potential to expand the harvest of high value native timbers into other State-owned public lands to support the timber industry and society more broadly into the future.

The option to undertake selective environmentally sensitive harvesting of high value timbers from the National Park estate should not be ruled out by future governments for future generations; given NSW's appalling history of opportunistic political transfers of well managed State Forests to National Park's. Three scenarios immediately come to mind:

- Salvage harvesting of high value timbers following storm or wildfire
- Harvesting of plantation areas captured within National Parks originally established by the Forest Commission of NSW for future harvest.
- Environmental harvesting of culturally important timber species to maintain and replicate the timbers used in Australia's iconic buildings such as the Sydney Opera House, the High Court of Australia and Parliament House.

Ever since the 1989 denial of the Tasmanian Wesley Vale pulp mill by the Federal Labour Government, successive governments both at a State and Federal level have been prepared to sacrifice the timber industry for the sake of winning "Green" votes to achieve or maintain government. This question was put directly to the then Prime Minister Bob Hawk by the ABC in 1989:

TRANSCRIPT OF INTERVIEWS WITH PAUL LYNEHAM, 7.30 REPORT,
JULY 1989

LYNEHAM: How much of today was about saving the environment and how much of it was about winning green votes to save the Government?

Bob Hawk PM: All of it was about saving the environment. I believe that when the election has come, that the people of Australia as far as they take the environment into account will give us the marks, not just because of today, but we have been an environmentally conscious and active government since day one.

The NSW Premier Bob Carr was responsible for an unforgivable crucifixion of the timber industry in NSW.

Since the election of the ALP in 1995, the Carr Government claims to have created 151 new national parks or reserves during its term. There have also been a number of amendments made to the National Parks and Wildlife Act 1974, which is now approaching 25 years of age. There is one school of thought that believes the Act should be totally rewritten to reflect modern approaches to conservation

Source: <https://www.parliament.nsw.gov.au/researchpapers/Documents/national-parks-in-nsw/22-98.pdf>

Sadly, the Labour Governments of both Victoria and Western Australia have now also destroyed the native timber industry in their States, gutting regional communities, creating rural unemployment, withholding the cultural benefits associated with one of Australia's finest timbers, Jarrah and all for an entirely political agenda. Has the Western Australian Government banned the permanent habitat destruction of Jarrah forests for bauxite mining? No!

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

NSW's productive native forests are essential in maintaining species survival and the integrity of Aboriginal cultural heritage.

The actions of successive Labour governments across Australia in simply putting up a new *Gate Sign* on well managed productive State Forests and calling them National Parks should be called out for what it is, **an opportunistic political stunt** aimed at winning "Green" votes in an urbanised society that is disconnected from rural life, rural people and communities.

I fully support State Governments purchasing private land that contains ecosystems not represented in the State Forests, Crown Land or National Parks. However, I am totally opposed to transferring State Forest to National Park management simply for political gain and for absolutely zero environmental benefit.

In terms of species conservation, a State Forest may well be superior to a National Park for the following reasons.

Table 1 Management Differences between State Forests and National Parks

Management Task	State Forest	National Park
Open roads and track systems available to emergency services and the general public	Yes the general public and emergency services have unrestricted access to all State Forests	No traditional State Forest tracking within a National Park is frequently "rehabilitated" or closed, road access is gated and locked and local RFS brigades are denied access.
Management of pests and weeds on public land	Yes generally proactive management of pests and weeds by full time staff and/or seasonal firefighters	Uncertain National Parks tend to be stretched in terms of human resources and often struggle to fulfill good neighbour obligations
Maintain a robust fire suppression capability	Yes FCNSW generally maintain an effective fire suppression human and equipment resource including CAT1 fire units, heavy plant and aircraft.	No National Parks struggle at major fires both in terms of human resources and equipment
Staff Trained in Bush Skills including fire	Yes FCNSW has a robust training programme especially for staff deployed to fire grounds	Uncertain National Parks often lack the benefit in fire and incident training and bush skills such as chainsaw operation
Estate subject to Catastrophic Fire Damage	Not immune , the FCNSW estate is prone to catastrophic fires, but the manager has the benefit of open roads and tracks, robust staff and training, aerial and	Yes Fire history has demonstrated that National Parks are at high risk from catastrophic fire due to the reasons outline above. Example, prior to the 2019/20 wildfires in December 2006

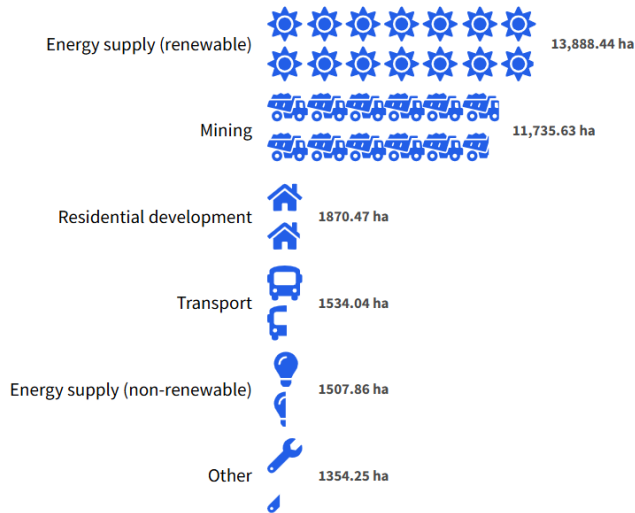
	heavy equipment to deploy to fire suppression.	the Victorian Parks lost 470,000 hectares to bushfires
Ecological Diversity	Yes Native forest harvesting creates ecological diversity through the creation of mixed aged forests and habitat as a consequence of harvest and regeneration. Facilitating a broad cross section of habitat types and species.	Uncertain National Parks have ecological diversity across habitat types but within habitat types ecosystems can stagnate due to a lack of disturbance. When disturbance occurs it can be in the form of catastrophic fires destroying both habitat and species.
Species Monitoring	Yes active programme of species monitoring associated with planning native forest harvesting coupes	Inadequate Wildcount 200 cameras across 146 parks (equivalent to 1.37 cameras per Park!)
Indigenous Heritage Survey and protection	Yes active programme of identification, buffering and protection especially in operational areas	Yes passive protection achieved by exclusion of the public
Third Party Auditing	Yes EPA & AS/NZS 4708 The Australian/New Zealand Standard for Sustainable Forest Management	No internal staff based assessments (State of the Parks) are undertaken but there is no evidence on the websites of any Third Party auditing of the effectiveness of species conservation and knowledge, pest and weed control and other management functions

Arboreal Habitat Destruction

In a rare article on the ABC News website (not condemning forestry) a study on Kolala habitat loss outlines the real threats to the Koala species in Australia. Forestry was not mentioned in this article.

Figure 1 Koala Habitat loss by Development

Proposed koala habitat loss by development type



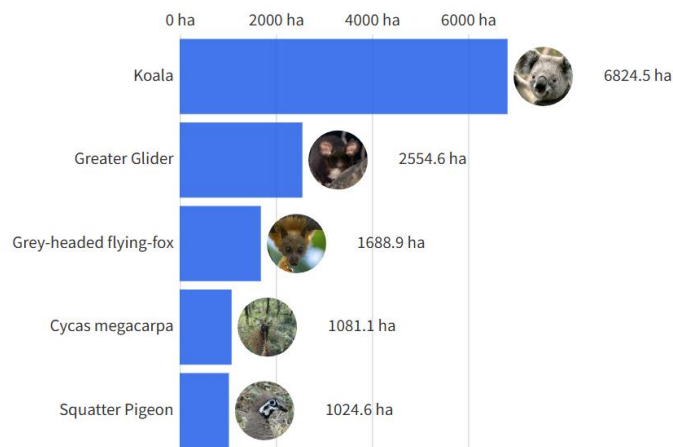
Source: DCCEEW • Icon credit: [Mining truck](#), [Ayub Irawan](#), CC BY 3.0; Icons = 1000 ha

Source: ABC Article [How much koala habitat is cleared for mining and renewable energy projects each year? - ABC News](#)

The renewable energy industry not only threatens Koala habitat, but a host of other threatened species.

Figure 2 Impact of renewable energy

Threatened species and renewables: Koalas have the largest area of habitat clearing approved



Source: DCCEEW • Supplied: [Greater glider](#), [Mark Gillow](#), CC BY 2.0; [Grey-headed flying fox](#), [Andrew Mercer](#), CC BY-SA 4.0;

The Great Koala Park is a total sham, it's a political deception, if the NSW Government was genuine in protecting Koala habitat it should be reigning in habitat destruction caused by the Energy, Mining, Transport and Residential development. The Great Koala Park will have ZERO net benefit on preserving the Koala's at a species level. Native forest harvesting does not remove habitat, it simply regenerates the age class distribution.

Occasionally, during native forest harvesting an individual native animal may be injured or even killed, and this is regrettable; but because the habitat is preserved in perpetuity the species will be preserved. We should not lose sight of the fact that native animals are subject to roadkill on a daily basis on NSW's roads and highways. I do not recall the Princess Highway ever being closed as a consequence of a Greater Glider being killed by a vehicle on Highway 1.

The Great Koala Park will however have a devastating impact on rural communities in northern NSW and the hardwood timber industry.

The Cultural Value of Timber

Shelter is one of the foundation needs for human existence. Since Australian settlement the bulk of the material needed to provide shelter to the Australian population has been sourced from native forest harvesting, softwood plantations or timber imported from other countries.

Whilst softwood plantations have a significant role in the production of house framing, panel board and low-cost furniture, plantations are unlikely to provide high quality timbers suitable for durable flooring, interior feature timbers and quality furniture.

In the rural landscape native forest timbers also provide fencing material, poles, yard and shed timbers.

Australian harvested timber is sustainable, has a low carbon footprint, creates rural employment, is subject to third party auditing and acts as a long-term carbon sink in constructed dwellings.

Alternative building materials such as steel, aluminium, concrete and brick cannot make the same claim.

The Cultural Value of Timber Towns

Timber towns were established over one hundred years ago and are dotted all along the east coast of NSW, sadly many of these towns such as Bombala, Woodenbong and Urbenville are progressively shutting down their community services. The small local sawmill has all but disappeared off the landscape in NSW.

Where mills continue to survive and are supported by local FCNSW field staff these communities will be maintained, however if the industry was to cease due to a politically opportunistic and insensitive decision many more small rural communities across NSW will fail.

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

There is and always will be a demand for quality NSW native timbers, if the industry were to close due to a misguided government the timber industry would continue but on a significantly reduced scale utilising private resource.

The community should not accept giving up on the following products:

Figure 3 Sydney Opera House



Timber has historically been used for acoustic applications for a number of reasons. A timber surface does not just reflect sound, but resonates slightly, giving it a particular quality and colour. A hard surface such as concrete reflects sound with a hard and sharp quality. In the Sydney Opera House, the musicians were happy to have timber used as it was a material they understood, many of their instruments being made from timber.

Source: https://www.utas.edu.au/_data/assets/pdf_file/0008/446705/SydneyOperaHouse.pdf

Figure 4 Australia's Parliament House Great Hall



Figure 5 High Court of Australia Courtroom 1

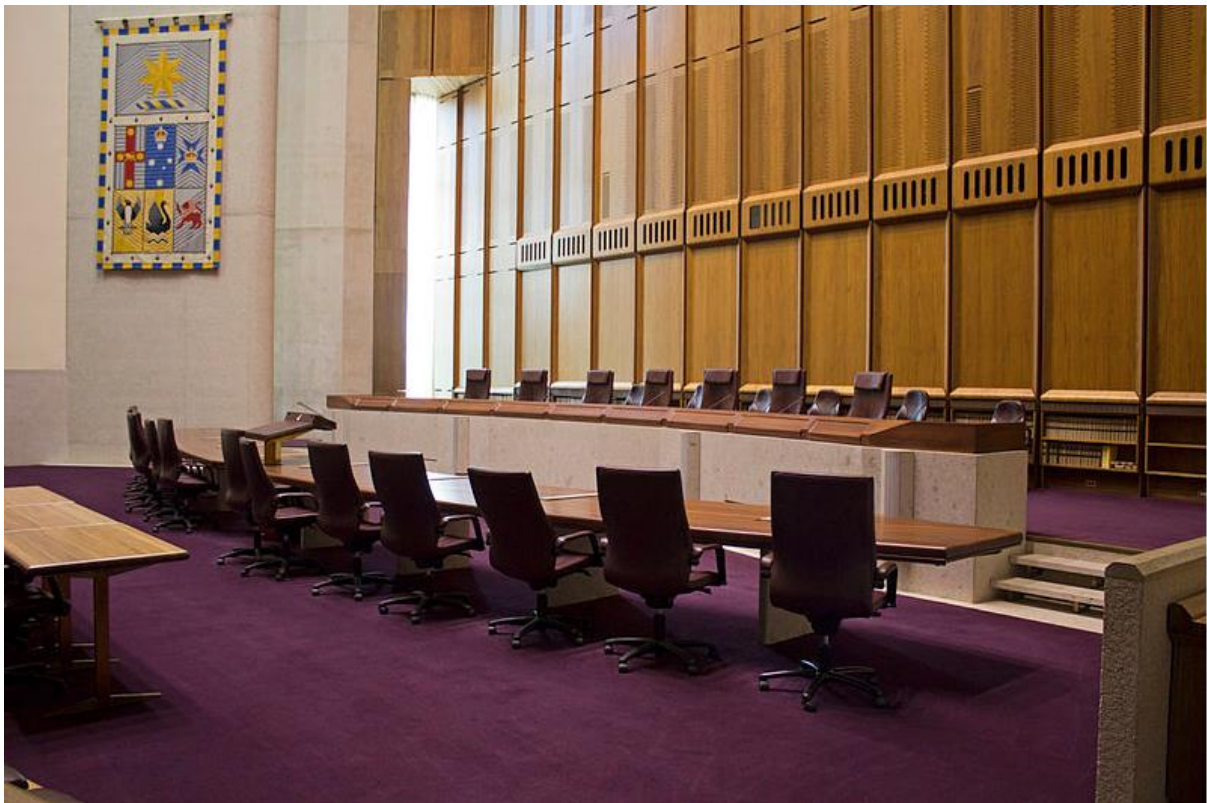


Figure 6 An Australian House - Ironbark Floor



It is inconceivable why a State Government would seek to deny its citizens access to NSW's iconic natural timbers, it is a modern-day *Slaughter of the Innocents*. Not only would the NSW Labour Government deny the community access to high quality sustainable timber, but it will destroy timber towns, impoverish timber workers and their families, disperse the bush skills required in emergency fires suppression and turn its backs on the university educated foresters who have dedicated their life to their careers and are global leaders in natural resource management.

Disruptions to World Trade

In the event of a world trade disruption, as was seen very recently during the Covid pandemic, and last century during the two World Wars and a pandemic, Australia will be unable to import timber (along with most other commodities). Without a domestic native timber industry, the building industry will be significantly impacted.

Coincidentally, the 1939 bushfires in Victoria occurred at the time of the commencement of World War 2, luckily the Victorian government at the time had not “banned” native forest harvesting!

"The salvage operation of the 1939 fire-killed timber ... was a tremendous operation. I was a member of the original salvage committee but I later became personally involved with the utilisation of small logs which were fire-killed and which were used to replace the hemlock flitches which had provided the bulk of the timber for the manufacture of cases prior to World War II. Enormous shipments of hemlock used to arrive here every month for case manufacture, but were cut off completely as soon as the War started. The logging which was a Forests Commission small log salvage undertaking was built up in the early 1940s, and reached a level of 65 million super feet of logs a year, a very big operation by Australian standards."

[JW Youl \(1979\)](#)

<https://www.victoriasforestryheritage.org.au/activities1/producing/78-post-1939-fires-recovery-salvage.html>

The Federal Government has recognised the consequences of disruptions to world trade and adopted their policy of a Future Made in Australia. Prime Minister has stated:

“Because for Australia to seize the opportunities of the next decade, for our nation to generate the energy, skills, jobs, technology and investment that will power our future prosperity.

Alongside the devastation of floods and bushfires, Australia has endured a once-in-a-century global pandemic. recognising that the game has changed - and the role of Government needs to evolve. Government needs to be more strategic, more sophisticated and a more constructive contributor.

We need sharper elbows when it comes to marking out our national interest.

And we need to be willing to break with old orthodoxies and pull new levers to advance the national interest.

We have to think differently about what Government can – and must – do to work alongside the private sector to grow the economy.

To boost productivity, improve competition and secure our future prosperity.

Combining market tools, with government action - to create wealth and create opportunity.

We need to take a fresh look at how government can support small business and start-ups and service industries to diversify our economy and our trade.

The heavy lifting of economic transition and industrial transformation is not being done by individuals, companies or communities on their own.

It is being facilitated, enabled and empowered by national Governments from every point on the political spectrum.

Because this is not about ideology, it's about opportunity – and it's about urgency.

Securing jobs, attracting investment and building prosperity has never been a polite and gentle process where every nation gets a turn - it's always a contest, it's always a race.

Governed by rules, driven by competition. And Australia can't afford to sit on the sidelines.

Second, we need to be more assertive in capitalising on our comparative advantages and building sovereign capability in areas of national interest.

For too long, Governments have taken a reactive, patchwork approach which has been more about managing an immediate crisis rather than maximising long term opportunity.

Our Government will be proactive when it comes to backing Australia's comparative advantages and delivering on our national interests."

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

I have worked in the plantation industry for over 45 years, in Western Australia, South Australia, Victoria, Tasmania and New South Wales. I was a Principal Consultant with the GHD Canberra office and consulted across all Australian States and Territories. The plantation industry in Australia has an incredible future, it is very good at producing certain products but will never replace what we can grow in our native forests.

Pinus radiata The Southern States (circa 28 yr rotation)

- Pulpwood for paper production
- Woodchips for panel board and export
- Sawlogs for timber framing
- Small wood for treated pine products

Eucalyptus globulus and *nitens* (Blue gums) (circa 10-15 yr rotation)

- Pulpwood for paper production

Southern Pines (Northern NSW and Queensland) (circa 28 yr rotation)

- As per *Pinus radiata* but a slightly higher grade of sawn timber

Native hardwood plantations for sawn timber (circa 50 to 75 yr plus rotation)

- **Uncommercial for private growers**
- **Net Present Value is cruelled by time and the discount rate.**
- **No proven examples of success in Australia**

Private Native Forestry

- Major issues with landowner acceptance
- High percentage of private timber bypassing this process
- Insignificant in scale compared to the State Forests of NSW

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

Traditionally this was called Multiple Use Forestry, and it has been practised in NSW's state forests where traditional activities outlined below are conducted:

- Species Conservation
- Sawlog production
- Pulplog production
- Firewood harvesting (by professionals and the general public)
- Post cutting
- Shingle cutting
- Plant harvesting
- Seed collection
- Unfettered access to the State Forest road and track system
- Grazing
- Bee keeping
- Mining
- Renewable energy production
- Bushwalking and related recreational activities
- Research
- Heritage studies and preservation
- Horse riding, vehicle and bike rallies
- School camps
- Hunting and fishing
- Others

Activities that can be undertaken in a National Park

- Species preservation
- Bushwalking
- Heritage studies and preservation
- Research
- School camps

The above highlights the importance of State Forests to the social fabric of our society, they engage a broad cross section of society with highly variable interests.

Aboriginal Forest Management Models

NSW has the ideal opportunity to revoke or recategorize Bob Carr's legacy - the highly controversial Murray River National Park and hand over the permanent management to the traditional owners including the Cummeragunja Local Aboriginal Land Council, Moama Local Aboriginal Land Council, Yorta Yorta Nations Aboriginal Corporation and Bangerang Aboriginal Corporation to manage as they see fit.

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.

My focus here will be on some general statements on carbon, biodiversity having been previously addressed.

It should be noted however that the reference to biodiversity markets above is dubious and potentially misleading; you cannot trade preserved biodiversity! Neither a State Forest nor a National Park can trade its biodiversity to a Wind Facility who seeks to clear 500 hectares of Koala habitat. This option is only available to unpreserved habitats on private land.

Carbon

- Apart from being a permanent carbon sink National Parks have no *additional* value in carbon sequestration.
- Apart from being a permanent carbon sink State Forests have no *additional* value in carbon sequestration.
 - Except – timber harvested from Native Forests and used in construction is a form of long-term carbon storage offsetting any emission impacts of its production.
 - The forest will regenerate from harvesting and eventually reach a carbon equilibrium with the adjoining forest.
- Additional Carbon can be achieved by establishing plantations or native plantings on cleared agricultural land.
- The greatest risk of greenhouse gas emissions for both land management options is a Catastrophic Bushfire! All other activities pale into insignificance.

Conclusion

The very notion of closing the native timber industry in NSW is a classic example of bad Politics getting in the way of good Governance. It would be a grave error of judgment, and outside of Sydney, its impacts would be significant to rural communities, timber towns and forestry workers and their families.

Not only that, as a society we would be denied access to some of the most beautiful timbers in the world.

Any legitimate independent scientist should tell you that there will be no net species conservation gain and a significantly increased risk of a catastrophic bushfire destroying a huge proportion of the northeast coast.

Alan P Cole

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Legume NSW

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