

# Public submission

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Independent Forestry Panel  
Independent Planning Commission  
Suite 15.02, 135 King St  
Sydney NSW 2000

**Submitted online:** <https://nswdpi.e.tfaforms.net/f/IFP-MakeAnOnlineSubmission>

Dear Panel Members,

### **Animals Australia's submission to the Independent Forestry Panel**

As a leading animal advocacy organisation, Animals Australia urges the State Government to stop native forest logging on animal welfare, wildlife conservation, and climate grounds.

#### **Animal welfare**

*"Any decision to clear native vegetation (or to allow it to be cleared) is also a decision to kill most or all of the individual animals inhabiting that vegetation."*<sup>1</sup>

Native forest logging is a significant animal welfare concern as it inflicts severe suffering and death to millions of individual animals. Native forest logging destroys essential shelter, nesting, and food resources, and causes animals direct physical and mental trauma, including fear, pain, stress, distress, thirst, and hunger. It also makes them more vulnerable to other threats such as predation and disease<sup>1</sup>.

*"The deaths, physical injuries, other pathological conditions, pain and psychological distress experienced by individual wild animals during and after land clearing is a harm of sufficient intrinsic value that it ought to be identified and evaluated in decision-making."*<sup>1</sup>

It is estimated that 100 million native animals are displaced, harmed or killed by bushland destruction in Queensland and NSW every year<sup>2</sup>. The severity and scale of this animal suffering is unacceptable.

Existing laws fail to prevent *"the unmitigated suffering and killing of native wildlife that results from bushland destruction"*<sup>3</sup>. NSW must act now to stop native forest logging and prevent this cruelty to animals.

#### **Wildlife conservation**

Despite widespread consensus that native forest logging is pushing Australian native fauna towards extinction, the NSW Government continues to approve the logging of thousands of hectares of native forest every year, driving many species, including koalas, quolls and gilders,

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<sup>1</sup> Finn HC, Stephens N (2017) The invisible harm: land clearing is an issue of animal welfare. Wildlife Research 44, 377-91 [Link](#)

<sup>2</sup> RSPCA QLD (2024) 100mil impacted: Joint report sounds alarm on scale of native wildlife deaths from deforestation. 29 Jul [Link](#)

<sup>3</sup> Casben L (2024) An average 100 mil native animals killed or injured each year from land clearing. Renew Economy, 3 Oct [Link](#)

towards extinction<sup>4</sup>. The “[c]learing of native vegetation has been implicated in the listing of 60% of Australia’s threatened species”<sup>5</sup>.

A 2023 study found “more than half (29 million ha) of pre-1750 (pre-European colonisation of Australia) native forest and woodland vegetation in NSW has been lost. Of the remaining 25 million ha, 9 million ha is degraded...affecting 244 forest-dependent now-threatened species”<sup>6</sup>.

Swathes of native forest have been cleared in areas designated for the future Great Koala National Park<sup>7</sup>. The destruction of this valuable habitat is particularly concerning given that the 2020 Legislative Council Inquiry into NSW Koala Populations and Habitat highlighted that, without action, koalas in NSW could be extinct by 2050. By continuing to incentivise the logging of koala habitat, the NSW Government is violating commitments made in the Koala Strategy 2021-2026 to restore and improve management of koala habitat<sup>8</sup>.

### **Climate change**

*“Mature forests contain many large, old trees (which are huge carbon stores)...logging mature forests...removes the large old trees which store many times more carbon than a regrowth sapling. If the wood from the logged mature tree reaches landfill quickly—as it does in the case of native forest logging in NSW—then native forests become a source of atmospheric carbon and not a sink. The older a forest is, the more carbon it stores”<sup>9</sup>.*

Native forest logging is driving climate change<sup>9</sup>, and climate change has profound negative consequences for the health and welfare of all animals<sup>10</sup>, including humans<sup>11</sup>. In contrast, “[c]onservation of native forests results in an immediate and substantial reduction in net emissions relative to a reference case of commercial harvesting”<sup>12</sup>.

Forests are of greater benefit standing than they are chopped down. To maintain a liveable climate for all animals including humans, it is imperative to stop native forest logging.

Animals Australia strongly supports the climate movement<sup>13</sup>. Given recent climate change-related disasters including devastating and unprecedented floods and fires<sup>14</sup>, stopping native forest logging (a key driver of climate change), should also be a top priority for NSW. It is untenable to actively drive climate change by continuing to facilitate native forest logging.

In addition to significant animal welfare, conservation, and climate change related concerns, we also take this opportunity to draw the Panel’s attention to the lack of economic viability, lack of compliance, failure to keep up with other jurisdictions, and public disapproval associated with native forest logging.

### **Lack of economic viability**

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<sup>4</sup> National Parks Association of NSW (n.d) Logging laws. [Link](#)

<sup>5</sup> Australian Government (2021) Australia State of the Environment Report [Link](#)

<sup>6</sup> Ward M et al (Preprint) The impacts of contemporary logging after 250 years of deforestation and degradation of forest dependent threatened species. BioRxiv, 23 Feb [Link](#)

<sup>7</sup> Long S (2024) “Perverse incentive” NSW Government continues native forest logging to keep carbon credits plan alive. Australia Institute, 24 May [Link](#)

<sup>8</sup> NSW Government (2024) The NSW Koala Strategy. 25 Sept [Link](#)

<sup>9</sup> National Park Association of NSW (n.d) Regional Forest Agreements are driving climate change [Link](#)

<sup>10</sup> Lacetera N (2018) Impact of climate change on animal health and welfare. Animal Frontiers 9, 26-31 [Link](#)

<sup>11</sup> McMichael AJ et al (2006) Climate change and human health: present and future risks. The Lancet 367, 859-69 [Link](#)

<sup>12</sup> Keith H et al (2015) Under what circumstances do wood products from native forests benefit climate change mitigation? PLOS One [Link](#)

<sup>13</sup> Animals Australia (2019) Here’s why we support the climate movement. 15 Oct [Link](#)

<sup>14</sup> Adapt NSW (n.d) Climate change impacts on storms and floods [Link](#)

Even solely on economic grounds, the native forest logging industry in NSW is not viable. A 2023 report by Frontier Economics for WWF-Australia found that “Forestry Corporation of NSW’s native forest logging business appears to offer poor financial returns to NSW taxpayers, with some parts of the hardwood business unlikely to be covering costs” and “there is also clear evidence that the value of the native forest would be higher as a standing resource”<sup>15</sup>.

Similarly, the Australia Institute concluded that the NSW “forestry industry runs at a loss and is propped up by taxpayers to the tune of hundreds of millions of dollars every year”<sup>17</sup>.

On top of these losses, externalities include loss of ecosystem services and climate-related risks<sup>9</sup>. For example, the State Government estimates floods alone cost the NSW economy \$250 million every year and flooding will only increase in frequency and severity with climate change<sup>14</sup> of which native forest logging is a driver<sup>9</sup>.

There is no sound economic argument for NSW to continue native forest logging.

### **Breaches and lack of compliance**

“Continuous breaches of native forest regulations by Forestry Corporation show a systemic pattern of noncompliance”<sup>16</sup>.

It has been reported that the state-owned Forestry Corporation of NSW “has racked up more than \$1.1 million in penalties for more than a dozen instances of unlawful activity in fewer than five years, including seven criminal convictions. It also faces three more criminal prosecutions that could result in up to \$12 million in additional penalties, if found guilty, and is under investigation for a further 18 potentially-illegal actions”<sup>17</sup>.

Of particular concern to Animals Australia is that the Forestry Corporation of NSW has been found “breaching forestry rules, including destroying hollow-bearing trees and critical habitat for endangered wildlife”<sup>16</sup>. Harm is being done to vulnerable animals. The surest way to protect animals from this harm is for NSW to cease native forest logging.

### **Community disapproval**

Native forest logging is unpopular. A 2018 study found the industry has a “very low” social licence. Including areas with timber industries, 65% of regional and rural residents view harvesting of native forests as unacceptable<sup>18</sup>.

### **NSW lags behind/ other Australian states and territories**

NSW’s failure to protect its native forests from logging is in stark contrast to other Australian jurisdictions. Namely, “South Australia has protected native forests since the 1870s. The ACT banned logging in the 1980s. As of 2024, Western Australia and Victoria have ended their native forest logging operations [with some exceptions]”<sup>19</sup>.

For animals, people, and the planet, Animals Australia urges NSW to stop native forest logging.

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<sup>15</sup> Frontier Economics (2023) Transition support for the NSW native forest sector [Link](#)

<sup>16</sup> Olumee F (2022) Fresh calls to axe native forest logging as NSW inquiry hears of industry woes. ABC New, 6 Apr [Link](#)

<sup>17</sup> Slezak M (2024) ‘Rogue’ government agency Forestry Corporation NSW accused of more illegal logging. ABC, 24 Jul [Link](#)

<sup>18</sup> Hannam P (2018) Bush turns its back on support for logging native forests. Sydney Morning Herald, 14 Nov [Link](#)

<sup>19</sup> Ward M et al (2024) More than half of NSW’s forests and Woodlands are gone as ongoing logging increases extinction risks, study shows. ANU, 5 Aug [Link](#)

I look forward to acknowledgment of our submission. Please advise if further information is required.

Yours sincerely,



Animals Australia Federation

