

Public submission

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Submission ID: na

Organisation: N/A

Location: New South Wales

Supporting materials uploaded: Attached overleaf

Submission date: 10/10/2024 3:02:00 PM

Submission to Independent Forestry Panel:

Peter Duncan AM (Chair), Professor Mary O’Kane AC and the Hon. Mick Veitch.

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

This submission is written on the Traditional Lands of the Gumbaynggirr people

10 October 2024

1. Sustainability of current and future forestry operations in NSW

Sustainability, ecological sustained forest management and sustained yield are concepts which have generated a range of definitions and interpretations, some far removed from a genuine interpretation of sustainability to the forest environment. My local colleague David Wood has, in his submission he included an excellent range of observations in the Coffs harbour region of local forestry practices that were not considered to contribute to maintaining of local biodiversity, including:

- depletion of timber resources over time ,
- destruction of original species mix and structure,
- tolerating regeneration failures ,
- selective removal of ‘undesirable’ native species,
- inadequate protection of examples of endangered species,
- inadequate or inappropriate monitoring of threatened species,
- broadscale removal of habitat trees,
- excessive destruction of residual forest components during harvesting operations,
- promotion of commercially favourable species, and
- promotion of invasive species by harvesting operations.

On the broader scale the peak of native forest harvesting in NSW was achieved in the post World War 11 years up to approx. the 1970’s. In fact in the early 1970’s the then NSW Forestry Commission released a Native Forest Timber policy document foreshadowing an end to native forest harvesting by the turn of the century due to predicted depletion of the resource. The Policy was withdrawn after a few months and thereafter the concept of ever yielding native forests resumed ascendancy.

At about the same time the then retiring Commissioner for Forests, Mr Jack Henry accompanied an Institute of Foresters inspection of the controversial “horseshoe forests” of the headwaters of the Nambucca, Kalang and Bellinger rivers and pointed out that the same yield of timber being extracted from 40,000 acres of steep and erodible native forest could be obtained from 4,000 acres of native forest plantation. The Forest Corporation are currently pushing strongly to relog the “horseshoe forests” which are also included in the proposed Great Koala National Park.

There was a period during the early 1970’s when the NSW Forestry Commission appeared to embrace a reform agenda of supporting expansion of plantations of both native forest species and pines, modification of some extreme harvesting policies and inevitable exit from native forest harvesting. As a forester working with the NSW Forestry Commission from 1970 to 1977 I experienced some of the highs and lows of those cautious attempts at reform. Unfortunately the attempted reforms were mostly extinguished in the years of conservative government leading up to the 1976 state election.

A poignant example of the retreat from reform was the announcement during the 1976 NSW state election caretaker period approval of a controversial major new logging road to access rainforest timber on Lever’s plateau adjacent to the Queensland border. I had firsthand experience of this as the forester responsible for survey, design and economic appraisal of the access road. That work was in early stages when a convoy of 4WD’s brought the Minister and other dignitaries up the

steep survey trail to a shaded rainforest glade where a card table was unfolded and adorned with a white laced tablecloth, fold up chairs produced as well as bottles of Champaign to announce prematurely the “approval” of the Lever’s plateau road.

Building of the Lever’s plateau road was quashed by the incoming Labor Government and the “approval” during the caretaker period recorded in a number of publications of the political events of that period. By the end of the year I had left working in the subtropical forests around Kyogle to join the National Parks and Wildlife Service in Kosciuszko National Park.

Almost as a footnote I have learnt that LIDAR mapping has recently located a 77m tall rainforest giant on Lever’s Plateau. It and many other giant hoop pines were in the NSW Forestry Commission’s sights in 1976.

Since the 1970’s the Forestry Corporation’s estimates of sustained yields have been proven time and time again to be gross over-estimates. As an example, since 2010 yields from state forests have declined by 40% from 1.3 million tonnes down to 0.8 million tonnes in 2023, and are currently only 61% of claimed sustained yields.

The massive loss of resources in the 2019/20 fires has yet to be factored in. It is a tree mining operation, that has only been able to be maintained by removing protections for most mature trees and increasing logging intensity in the 2018 revision of the Coastal IFOA’s.

In conclusion, logging of native forests is not sustainable as it:

- reduces biomass and carbon storage,
- removes mature trees and their abundance of nectar and browse essential for many species,
- depletes oldgrowth trees and the hollows that 174 of NSW’s species depend upon for dens and nests,
- increases fire threat and intensity,
- reduces stream flows and reduces the function and health of waterways,
- promotes weeds and dieback, and
- increases erosion and stream pollution.

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

Forests provide the following environmental and cultural values

- generate rainfall and cool the land,
- clean the air,
- provide homes for a plethora of threatened species,
- are important for recreation and improved health,
- filter and regulate runoff to streams, and
- remove carbon dioxide from the air and store it in their wood and soils.
- Recreational values for locals and visitors.
- Cultural and spiritual significance, especially for indigenous communities.
- Habitat connectivity, supporting biodiversity and ecosystem health.

If we want to save NSW’s 269 nationally listed threatened forest species, including the endangered Koala and Greater Glider, it is essential that we stop logging their homes.

- Forests are vital refuges for many threatened species that rely on mature, intact forests

- Forests provide important services for the environment and regional communities, such as Water quality and flow regulation, important for water quality, fishing and tourism.

Healthy and unlogged forests are critical to the whole environment and both First Nations and non-First Nations culture and identity.

In the 1990's I was part of the NPWS team which participated in implementing the 1992 National Forest Policy through Regional Forest Assessments (RFA's) for the Upper and Lower North Coast Forest regions.

The outcomes were summarised by Flint C et al, 2004* *"the process began in north-east NSW in 1995 and resulted in the direct reservation of 737,602 hectares of forest as National Parks estate in north east NSW, the exclusion of logging from all mapped oldgrowth forest (greater than 25 hectares) and rainforest in remaining State Forests, and the provision of 20 year, binding wood supply agreements to the timber industry in the region at 50% of 1995 levels."*

Reservation targets set during the RFA process were used to provide an empirical assessment of reserve adequacy for fauna in the region. Flint et al further reported that :

- *"only 29% of priority fauna populations have fully achieved reservation targets in north-east NSW, and*
- *across all populations, mean target achievement is only 49%. and*
- *the scale of the reserve outcome did not satisfy the national reserve criteria for forests and is considered to be inadequate to ensure the survival of priority species in north-east NSW."*

It has since been widely recognised that the koala, then rated as commonly occurring species, was not dealt with well by the RFA process. With techniques available at the time it was difficult to record koalas in systematic surveys and most of the records were from urban and near urban areas.

A number of attempts to subsequently review and rectify the poor outcome for the koala in the RFA were unsuccessful.

By 2010 I had retired and was sitting out time, until my partner did the same, by joining the Bellingen Environment Centre. Reports from local landholders and residents of the decline in local koalas became, by 2010, too much to ignore. In collaboration with The Clarence Environment Centre, The Nambucca Valley Conservation Council, the North Coast Environment Council and the local branch of the National Parks Association we engaged outstanding locally based fauna ecologist David Scotts to undertake an initial assessment of koala populations between the Macleay and Clarence Rivers.

Scotts Identified three Koala metapopulations containing 21 sub populations. The central and southern metapopulations – the Guy-Fawkes- Coffs Harbour and Bellingen- Nambucca and Macleay, quickly became apparent as targets for a large scale conservation network despite ten of the fourteen subpopulations as being rated by Scotts as in decline.

During the assessment period the koala's status was uplifted from common to threatened and by 2015 the NSW Labor party came onboard to support what was then the proposed Great Koala National Park.

The proposed park was savaged by the 2019-20 fires, which led to the koalas status being upgraded to endangered and probably set 3 more subpopulations (now 13 of 14) in decline. Logging continued and after the Labor Government was elected in

March 2023 doubled in extent and continues to this day- some progress on the GKNP is promised by the end of the year.

Its early days but a number of lessons can be learnt from the GKNP exercise to date to assist in developing a revised Forest Industry Action Plan including:

1. Major forest reform must be accompanied by interim forest protection provisions as icon forests will otherwise be targeted.
2. Data collection and decision making processes should be watertight otherwise negotiations will be strung out.
3. Planning for restructure and compensation should start on day 1(if not earlier).
4. Getting a handle on the jobs and the timber resources is difficult and always has been .
5. Native forest plantations can be critical habitat and require a sophisticated approach.
6. Saving koalas doesn't necessarily mean saving gliders
7. Good habitat which is currently low on koalas may be important for longterm recovery.
8. don't let the planning become a squabble over landuse , there is serious planning to do to implemment the Government's commitment to a flagship Great Koala National Park.
9. Species recovery and reserve management barely register with Treasury.
- 10 Big initiatives require big support from Government- well beyond duties as normal for public servants

Relating to some of these matters is attached a copy of a letter to the Hon Penny Sharpe of 10 October 2024

*Carmel Flint¹, Dailan Pugh² and Daniel Beaver 2004 ***The good, the bad and the ugly: science, process and politics in forestry reform and the implications for conservation of forest fauna in north-east New South Wales. In: Conservation of Australia's Forest Fauna (second edition) 2004, edited by Daniel Lunney. Royal Zoological Society of New South Wales, Australia***

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

Native hardwoods comprised 2.4 million (9%) of Australia's log production of 25 million cubic metres in 2023, with half this exported as woodchips. Saw and veneer logs comprised just 8% of the 8.5 million cubic metres of logs obtained from hardwood plantations, with 87% exported as woodchips. There is no longer any need to log public native forests to build houses. With a change in emphasis we can satisfy our hardwood needs with sawn timber and composite timber products from existing plantations.

Shifting to plantation timber reduces pressure on native forests, supporting sustainable industry practices

Sawn and treated softwood logs and composite timber products made from softwoods can substitute for all current uses for native forest and plantation hardwoods

The market and demand for native forests is declining rapidly, the recent example of Essential Energy moving away from power poles harvested from native forests is just one example

The development of alternative materials to replace wood fibre need to be considered including;

1. Industrial hemp for a range of products from structural building materials to pulp and paper.
2. Other pulp and paper sources.
3. Advances in structural manufacturing and laminating of “low value” timber and fibre.
4. structural and laminating approaches to flooring and decking.
5. recycled plastics for boardwalks and decking
6. Plastics and infill materials for piles

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

Hardwood and softwood plantations already provide 91% of Australia’s log production. The proportion of saw and veneer logs obtained from hardwood plantations needs to be increased, rather than being exported as woodchips. Without competition from subsidised public forests there will be an increased incentive for selective logging of speciality purpose hardwoods from private forests.

Investment in hardwood plantation on already cleared land would supply timber products into the future

- Shifting to higher-value plantations can better meet timber needs.
- A higher proportion of harvested logs from plantations should be prioritised as saw and veneer logs, rather than exporting them as wood chips
- Subsidising the logging of public native forests by the Forestry Corporation is non-competitive and distorts the market away from the more profitable softwood plantation industry
- High-end and luxury native hardwood products should only be selectively harvested on private land and under strict conditions.

Significant areas of native forest plantations have been included within conservation reserves in North East NSW primarily as a result of past major land use negotiations. Preferably it would be desirable to exclude those plantations but factors such as boundary area ratios, access issues, habitat value are obviously important.

This is particularly important in the GKNP where this issue is highlighted because:

- The APPM commenced purchasing, in the 1960’s a large number of dairy farms on coastal river floodplains which had been established from original forests with subtropical rainforest components, and planted eucalypt (predominantly flooded gum- a secondary koala food tree) plantations on these lands, then left.
- The then Forestry Commission in the 1970’s converted flooded gum forest areas on state forest (commonly with subtropical rainforest elements- often advanced) to plantations by clearing, stacking, burning and planting

In both these situations the plantations have commonly recovered as koala habitat and regenerating endangered lowland rainforest communities. They exist in coastal areas where there are a considerable range of other threats to koalas.

It is recommended your Panel initiate a scientifically and practical landuse classification and management approach to the assessment of existing native forest plantations and planning for future plantations. If not managed sensibly this issue can become difficult and wrongly politicised as being anti-plantation. Landuse planning is very important.

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

There are 2 million hectares of State Forests in NSW that provide water for numerous town reservoirs, have the potential to contribute to increased tourism, and take-up and store carbon. All these real economic benefits will improve if logging is stopped.

In 2023 Forestry Corporation lost \$15 million on their hardwood operations, that's a cost of \$1,281 for each hectare logged. This is despite being paid \$31 million for their community service obligations that year, and obtaining tens of millions in regular equity injections.

We should not be paying to degrade forests and log the homes of threatened species. Public forests are of greater economic benefit for water yields, tourism and carbon storage than they are for logging. It is in the best interest of taxpayers to stop logging of public native forests.

Diverse forest management, particularly Aboriginal models, can enhance the cultural and social value of forests. First Nations Ranger Programs have been hugely successful at managing the recovery and health of native forests. Programs like the Githabul Rangers have shown how First Nations knowledge and management can restore the natural and critical function of forests in the landscape.

Native forests that are not logged therefore have real and tangible benefits to the entire ecology and economy of NSW.

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.

Key points are:

- Native forest logging in NSW releases 3.6 million tonnes of carbon (CO₂e) per year, which is equivalent to the annual emissions of 840,000 cars.
- The volume of carbon stored in logged forests has been more than halved.
- Stopping logging will enable forests to regain their lost carbon and make a significant contribution to meeting our climate targets.
- As shown by the 2019/20 wildfires, increasing droughts and fires due to climate heating are already having a significant impact on trees, forest species and rainforests.
- It is essential that logging stop to allow forests to reduce the impacts of climate heating by removing CO₂ from the atmosphere, and recover their integrity to better withstand future impacts