Independent Forestry Panel

Public submission

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Biodiversity Council

Submission to Independent Forestry Panel

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About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.

The Biodiversity Council welcomes the opportunity to provide feedback to the Independent Forestry Panel to inform the development of the Forestry Industry Action Plan by the NSW Government.

NSW forest policy settings are decades old. The three Regional Forest Agreements between the Australian Government and the New South Wales (NSW) government were signed in 1999 (Eden), 2000 (North East) and 2001 (Southern), respectively. In 2018, the amendments were reviewed, but only relatively minor changes were made as part of a 20-year extension.

The forest policy framework and regulatory settings do not reflect our current understanding of the risks to biodiversity from timber harvesting. For instance, the RFAs were originally drafted prior to iconic forest-dependent species the Koala[1] and Greater Glider[2] being listed as threatened under the *Environment Protection and Biodiversity Conservation Act 1999*, before the Forests of East Australia were identified as an international biodiversity hotspot,[3] and before the devastating impacts of the 2019/20 Black Summer Bushfires.[4] A comprehensive review of the policy goals and regulatory settings for forest management in NSW is long overdue.

Key concerns

1. Timber production is prioritised over other values

The underlying driver of forest management in NSW is growing trees as a crop ("to secure wood supply") rather than managing forestry holistically for the variety of ecosystem services that they provide. For example, amended Eden RFA states that:

> *"The Parties will use best endeavours to **ensure** that any changes to the total area of State forest or areas excluded from timber harvesting or Regional Prescriptions applied to State forest will not lead to a net deterioration in the capacity to supply wood from the Eden region"* (Clause 69).

Moreover, the Commonwealth is obligated to compensate the New South Wales government if it takes actions to protect the environment and heritage values of native forests and these actions prevent or substantially limit the sale or commercial use of Forest Products, the construction of roads or mining (see Clause 97).

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[1] *Phascolarctos cinereus* (Koala) was listed as Vulnerable in 2012. It was uplisted to Endangered in 2021. See: https://www.environment.gov.au/biodiversity/threatened/species/pubs/85104-conservation-advice-12022022.pdf

[2] *Petauroides volans* greater glider was listed as Vulnerable in 2016. It has now been separated into two species and one (*Petauroides volans* (southern and central)) was uplisted to Endangered in 2022. See: https://www.environment.gov.au/biodiversity/threatened/species/pubs/254-conservation-advice-05072022.pdf

[3] Williams, K.J. et al. (2011). Forests of East Australia: The 35th Biodiversity Hotspot. In: Zachos, F., Habel, J. (eds) Biodiversity Hotspots. Springer, Berlin, Heidelberg. https://doi.org/10.1007/978-3-642-20992-5_16

[4] Over 450 threatened plant species were affected with more than 60% of these species are considered at high or medium risk of decline because of impacts of the 2019–20 fires, 293 threatened animal species were in the footprint of the fires. See: https://www.soe.epa.nsw.gov.au/all-themes/land/fire#:~:text=Black%20Summer%20fire%20season,-The%202019%E2%80%9320&text=As%20a%20result%20of%20the,in%20NSW%20(Table%2022.1).

This contrasts with protection of matters of national environmental significance for which the New South Wales government will use:

> *"best endeavours to ensure that the Forest Management Framework provides for the protection of Matters of National Environmental Significance"* (Clause 25).

The prioritisation of commercial timber production is reflected in forest plans. For instance, harvesting conditions that selectively harvest mature trees while retaining 'good growing stock' (younger age-class trees) to be left for a future harvest. The selective removal of older trees reduces the number of trees of a suitable size and age to form future hollows.[5] In NSW, terrestrial vertebrate species that are reliant on tree hollows for shelter and nests include at least 46 mammals, 81 birds, 31 reptiles and 16 frogs, of which 40 are listed as threatened under the *Threatened Species Conservation Act 1995 (NSW).*[6]

It is concerning to attempt to 'guarantee' future timber supply, given that timber production is at risk from increased fire frequency. Following the 2019/20 Black Summer bushfires, the Forestry Corporation of NSW's was about 60% of the level of two years earlier.[7] More frequent fires are likely to further reduce timber volumes.[8]

The prioritisation of timber harvesting over other forest values is not aligned with contemporary community values. Recent research has found that 69% of Australians (70% in NSW) support an end to native forest logging.[9]

2. Current approaches to conserving biodiversity are ineffective

It is often stated that timber harvesting occurs over a relatively small area compared to the entirety of State-owned forest (e.g. 30,000 ha per year out of 2 million hectares),[10] and thus it is implied that the impact on biodiversity from forestry is minimal. The underlying assumption is that the forest estate is homogenous, but this is far from true. The forest estate shows variability in type (both vegetation and habitat), condition, and connectivity, which all affect biodiversity.

Conservation of biodiversity values through the RFA framework has focussed on protecting representative examples of each forest type to meet the CAR principles and protection of old growth forest. While these are worthwhile objectives for strategic conservation planning, they are inadequate proxies for conservation of threatened species. Recent research has shown that 43 threatened species that have been impacted by historical deforestation and degradation continue to

[5] McLean, C. M., Bradstock, R., Price, O. and Kavanaugh, R. P. (2015) Tree hollows and forest stand structure in Australian warm temperate Eucalyptus forests are adversely affected by logging more than wildfire *Forest Ecology and Management* **341:** 37-44. https://doi.org/10.1016/j.foreco.2014.12.023

[6] See: https://www.environment.nsw.gov.au/topics/animals-and-plants/threatened-species/nsw-threatened-species-scientific-committee/determinations/final-determinations/2004-2007/loss-of-hollow-bearing-trees-key-threatening-process-listing

[7] Frontier Economics (2023) Public native forest logging: a large and growing taxpayer burden. A report for the Nature Conservation Council of NSW. November 2023. https://assets.nationbuilder.com/natureorg/pages/2713/attachments/original/1699421741/23-11-02_Public_native_forestry_a_growing_taxpayer_burden_Final_report_STC_%281%29.pdf?1699421741

[8] Ibid.

[9] https://australiainstitute.org.au/wp-content/uploads/2024/04/Polling-Native-forest-logging-Web.pdf

[10] See: https://sustainableforestmanagement.com.au/are-nsw-state-forests-being-managed-sustainably/

be impacted by logging and now have less than 50% of their pre-1788 extent remaining intact.[11] This is despite the fact that the NSW State of the Environment Report shows that most of the area covered by the three NSW RFAs have more than 70% of regional ecosystems represented in the public reserve system.

Instead of a strategic approach to protect threatened species, forest management in NSW appears to rely on case-by-case management of individual operations. For instance, Greater Gliders are 'protected' by identifying den trees and a 'minimum number' of hollow-bearing trees per hectare and protecting them from harvesting operations. Greater Glider exclusion zones are established around trees where animals are seen during surveys, but these are only 50 metres in diameter.[12] This approach heavily favours timber harvesting over risks to populations of Greater Gliders, given that the Federal Conservation Advice for the species notes that they are particularly sensitive to forest clearance. Of particular concern is that the abundance of hollow-bearing trees likely to be suitable to the species can be overestimated and that hollow-bearing trees are at greater likelihood of collapse in small patches post logging. Given the risks to the species a more precautionary approach would be to protect areas of forest that are modelled as suitable habitat for the species, rather than individual trees.

It is critical that strategic planning consider the historical distribution of all threatened species, as well as the cumulative decline in habitat condition when considering the impacts of logging. This must include the potential negative interaction of logging and fire on losses of hollow-bearing trees,[13] and the likelihood of further declines in habitat given the increased likelihood of megafires like the Black Summer Bushfires of 2019/20 in the future.[14]

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[11] Ward, M., Ashman, K., Lindenmayer, D. B., Legge, S., Kindler, G., Cadman, T., Fletcher, R., Whiterod, N., Lintermans, M., Zylstra, P., Stewart, R., Thomas, H., Blanch, S. Watson, J. E. M. (2024). Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species. *Conservation Science and Practice* **6(**9): e13185 https://doi.org/10.1111/csp2.13185

[12] See: https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/forestagreements/coastal-ifoa-site-specific-biodiversity-condition-for-greater-gliders-240526.pdf

[13] McLean, C. M., Bradstock, R., Price, O. and Kavanagh, R. P. (2015) Tree hollows and forest stand structure in Australian warm temperate *Eucalyptus* forests are adversely affected by logging more than wildfire. *Forest Ecology and Management* **341:** 37-41.

[14] Canadell, J. G., Meyer, C. P, Cook, G. D., Dowdy, A., Briggs, P. R., Knauer, J., Pepler A. and Haverd, V. (2021) Multi-decadal increase of forest burned area in Australia is linked to climate change *Nature Communications* **12**: 6921 (2021). https://doi.org/10.1038/s41467-021-27225-4.

The Biodiversity Council recommends that:

Overarching policy goals for NSW forests change from prioritising timber production to balancing the diverse range of ecosystem services provided by a forest including biodiversity, cultural heritage, recreation, carbon storage, water provision and timber.

Forests are managed with the goal of recovering forest-dependent threatened species, considering their current and historical abundance and distribution, and both current and likely future threats. Risks to threatened species should primarily be managed by strategic approaches that conserve habitat and populations, rather than operational controls in areas to be harvested.

Strategic planning is undertaken to identify the variety of ecosystem services provided by particular forest areas. This should include detailed analysis of the value of these ecosystems services at a national and State level, their ability to be replaced or substituted, likely future demand for these services, and future risks such as fire and climate change. This planning should be undertaken using the best available data.

Local and regional partnerships, including Aboriginal and Torres Strait Islader people, guide how differing values are reconciled.