

# Public submission

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**Organisation:** *Friends of Lane Cove National Park*

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**Supporting materials uploaded:** *Attached overleaf*

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## Friends of Lane Cove National Park

# Submission to the Independent Forestry Panel on the Sustainability of current and future forestry operations in NSW

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## **Background**

The focus of *Friends of Lane Cove National Park* is on the protection and restoration of the ecosystems of Lane Cove National Park through bush regeneration. We recognise the critical importance of our native forest estate in a biodiversity crisis and in the face of catastrophic climate change. As such, this submission focuses on the importance of protecting and restoring our native forest estate and the impact of native forest logging.

## **Sustainability of current and future forestry operations/importance of our native forests**

The word 'sustainability' refers to whether something can be maintained at a certain rate or level. It is crystal clear that NSW's current forestry practices and operations involving the logging of native forests cannot and must not be maintained because of its detrimental environmental, economic and social impacts.

The ANU's Institute for Climate Energy and Disaster Solutions points out that a staggering 29 million hectares of the forests and woodlands of over NSW have been destroyed since European colonisation, with a further 9 million hectares degraded in this time. This adds up to over 60 percent of the state's forest estate and we cannot afford to lose any more.<sup>1</sup> Recent research has shown that deforestation has a cumulative impact on biodiversity and recent logging has potentially impacted 150 species already impacted by this historical damage.<sup>2</sup> This is not only because it reduces critical habitat for species (for example old hollow bearing trees) but because it also changes forest composition making them unsuitable for vulnerable species such as the koala and Greater Glider.<sup>3</sup> It also makes them more prone to bushfires, degrades waterways and

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<sup>1</sup> Ward, M, Lindenmayer D, Watson J, 'More than half of NSW Forests and woodlands have gone as ongoing logging increases extinction risks, study shows' August 5, 2024, *The Conversation* <https://iced.s.anu.edu.au/news-events/news/more-half-nsw%E2%80%99s-forests-and-woodlands-are-gone-ongoing-logging-increases-extinction>

<sup>2</sup> Ward, M, Ashman et al, Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species, *Conservation Science and Practice*, 4 August 2024, <https://conbio.onlinelibrary.wiley.com/doi/10.1111/csp2.13185>

<sup>3</sup> Au J, Clark, C, Allen et al 'A nutritional mechanism underpinning folivore occurrence in disturbed forests', *Forest Ecology and Management*, 453, 2019

worsens the impact of climate change taking away important carbon sinks. <sup>4 5</sup>. This is all not helped by the fact that Forestry Corp has on multiple occasions breached environmental regulations with the NSW EPA (which has been accused of being lax in regulating the agency <sup>6</sup>) stating the organisation had ‘a history of noncompliance’. <sup>7</sup> It is unacceptable that current forestry practices are contributing to the continuing deterioration of our environment at a time when it is imperative we avoid and minimise environmental impacts and work towards its restoration. As Ken Henry points out,

‘the fact of humanity’s dependence upon the quality of the biosphere, in both social and economic dimensions, is as immutable as the law of physics. The case for giving primacy to environmental repair is inescapable. Our future depends on it.’ <sup>8</sup>

Economically, continuing native logging makes no little sense as the industry is reliant on government subsidies. A Frontier Economics study points out that it is time to reconsider the way NSW native forest estate is being used as it appears to offer poor financial returns to NSW taxpayers, ‘with some parts of the hardware timber business unlikely to be recovering costs’. The 2019-20 bushfires reduced supply and there is widespread recognition ‘of the significantly higher value that standing native forests offer in comparison to logging’. <sup>9</sup>

It is clear that the social impacts of native logging are particularly acute for First Nations peoples because of the impact on cultural heritage and the fact their interests in maintaining the NSW forest estate has been routinely ignored <sup>10</sup>. On top of this, it is questionable as to whether native forest industry has a social license to operate as there is widespread opposition to native logging as ‘an activity that is non renewable or unsustainable’. <sup>11</sup> It is clear that the current logging of the area covering the promised Great Koala National Park has managed to completely obliterate any remaining social license that native logging might have had in NSW.

### **Demand for timber products, particularly as it relates to NSW housing, construction, mining, transport and retail/future of softwood and hardwood plantations.**

From an environmental and economic point of view, the future of the forest and timber industry in NSW must be in the plantations sector which is more sustainable and more profitable. It is appalling that our precious native forests are ending up as woodchips, firewood and paper pulp. <sup>12</sup> Lindenmeyer notes that only 4 percent of the biomass in a logged native forest ends up as sawn timber. <sup>13</sup> It is irrational and irresponsible, given the immense importance of our native forests, to continue to log them when demand for timber can be met by plantations which already provide the vast majority of log production. It is important that the NSW Government transitions away from native forestry and invests in the expansion of softwood and for hardwood plantations which must have strong environmental and community protection and be limited to high value timber products. This should not involve clearing any more native forests or vegetation for plantation establishment and recent research outlines a need for a more robust regulatory framework to ensure no more deforestation occurs through plantation establishment. <sup>14</sup>

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<sup>4</sup> Zylstra, P, Wardell-Johnson et al, ‘Native forest logging makes bushfires worse’, May 21, 2021

<https://www.uow.edu.au/media/2021/native-forest-logging-makes-bushfires-worse--and-to-say-otherwise-ignores-the-facts.php>

<sup>5</sup> National Parks Association, ‘Regional Forest Agreementhttps://npsw.org.au/wp-cs have failed to protect our water supplies, npsw.org.au/wp-content/uploads/2016/10/npa\_regional-forest-agreements-have-failed-to-protect-our-water-supplies.pdf

<https://www.echo.net.au/2015/12/call-to-investigate-forestry-corp-over-trashing-of-border-ranges-forest/>

<sup>7</sup> See <https://www.abc.net.au/news/2022-03-15/logging-forestry-corporation-native-timber-greens/100910456>

<sup>8</sup> Henry, K Final Report, *Independent Review of the Biodiversity Conservation Act 2016*, <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/overview-of-biodiversity-reform/statutory-review-of-the-biodiversity-conservation-act-2016>

<sup>9</sup> Frontier Economics, ‘Transition support for the NSW native forest sector’, 30 May 2023, <https://www.frontier-economics.com.au/the-time-to-end-native-forest-logging-in-nsw-is-now/>

<sup>10</sup> Langton, M, Corn, A *Law, The Way of the Ancestors*, Thames and Hudson, 2023.

<sup>11</sup> See for example <https://www.abc.net.au/news/2018-12-10/forestry-survey-rejects-native-forest-logging/10597490>

<sup>12</sup> Department of Agriculture, Fisheries and Forestry 2023 *Australia’s State of the Forests Report*.

<sup>13</sup> Lindenmeyer, D *Forest Wars* Allen and Unwin, 2024, page 105

<sup>14</sup> Cadman, T, Madonald K et al Forest Conversion and timber certification in the public plantation estate of NSW, *Land Use Policy*, August 2024, <https://www.sciencedirect.com/science/article/pii/S0264837724001327>

## **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**

As noted above, in a climate and biodiversity crisis, the importance of intact native forests can not be overestimated.<sup>15</sup> They are critical carbon stocks and as Dr Heather Keith from Griffith University has stated, there are clear economic gains from ending native forest logging including a wide range of ecosystem services – meaning the economic value of native forests for carbon storage is far greater than the value of forests for woodchips and paper production.<sup>16</sup> She points out this will entail a major skilled workforce in rural and regional Australia to manage and quantify carbon stocks.

In contrast, native logging in NSW annually releases a massive 3.6 million tonnes of carbon.<sup>17</sup> Stopping native forest logging is key to achieving net zero and if Australia were to stop logging native forests, we would reach our greenhouse gas reduction target by 2030.<sup>18</sup>

Leaving these forests intact is an important mitigation strategy for the impacts of climate change, lowering the risk of catastrophic bushfires and increasing water security in a changing climate.

Written by Bronwen Hanna, October 2024

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<sup>15</sup> Mackey, B, DellaSala, C et al, Policy Options for the world's primary forest in multilateral environmental agreements, *Conservation Letters*, 8: 139 2

<sup>16</sup> Keith, H, Vardon M, Ecosystem accounts define explicit and special trade-offs for managing natural resources, *Nature, ecology and evolution*, September 2017

<sup>17</sup> NSW Forest Carbon: An effective climate change solution,

<https://static1.squarespace.com/static/60b20f09dcfc4f2bd6b0c171/t/63ddcef58bf792078c351e0f/1675480953905/NSW+Carbon+Report.pdf>

<sup>18</sup> Lindenmeyer, D Forest Wars, *ibid*, page 183