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Topic 1. Sustainability of current and future forestry operations in NSW

The experience with native forestry in other states such as Victoria and WA is that the forest resource has been managed in an unsustainable manner. More mature trees are removed than grow and eventually, the industry collapses. A similar process is happening in NSW and this is not surprising as forestry operations here are subject to the same union, political, and economic pressures that lead to overcutting, diminution of the resource, and finally collapse. What is left is a young, fire-prone forest that produces pulp rather than saw logs and is of low biodiversity value. The unsustainable native forest logging industry has many problems. There are substantial environmental effects on soil erosion, water quality, biodiversity, and long-term carbon capture. From an economic perspective, the industry needs propping up with large subsidies, the real job numbers of workers directly involved are small and the loss to state treasuries considerable. Having driven on Mid North coast roads for more than forty years I have been struck by the noticeable decline in the average size of logs on logging trucks. These incidental observations are consistent with a declining resource base. In addition, the 2019/2020 black summer fires are likely to have impacted timber yields. A recent study points out that in Australia fires burn a greater proportion of timber production forest than anywhere else in the world except for Portugal. Substantial and increasing global losses of timber-producing forest due to wildfires | Nature Geoscience. This report points out that there are likely to be substantial wildfire-driven timber losses under increasingly severe climate change. This is likely to further reduce future timber yields. (Substantial and increasing global losses of timber-producing forest due to wildfires | Nature Geoscience)

A short time after the black summer fires Forest Corp announced a return to a business as usual approach to harvesting in fire affected areas. The NSW EPA replied that a return to operating under the CIFOA was not tenable. (CEO Letterhead template (nsw.gov.au) A report commissioned by the EPA, 'concluded that the standard CIFOA will not deliver ecologically sustainable management as required under the objectives of the Forestry Act 2012 and is likely to cause a significant impact under the NSW Biodiversity Conservation Act 2016 and the Commonwealth Environment Protection and Biodiversity Conservation Act 1999' (review-of-cifoamitigation-conditions-for-timber-harvesting-in-burnt-landscapes (nsw.gov.au))

This continued overcutting and mishandling of public forests has persisted for many decades. It seems to be embedded in Forestry Corp culture and probably can only be remedied by a ban on native forest logging.

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

Many species rely on mature intact forest ecosystems. The needs of Greater gliders and Yellow-bellied gliders and Koalas have been well documented. Other less obvious animals are also dependent on a fully functioning forest ecosystem. The Giant barred frog needs clear, flowing water for nine months or more to complete its life cycle. Following logging in the Mid North Coast

area the creeks initially are filled with dirt and gravel and then dry out leaving both people and frogs without the clean water that they need.

Many plant species also rely on a mature forest ecosystem. One example is the Black Bootlace Orchid, a spectacular leafless orchid with a long dark stem that climbs many meters up eucalypt trees before it flowers. They don't have conventional roots instead relying on a type of symbiotic relationship with fungi that are only found in deep forest leaf litter. Now that the trees and leaf litter have been removed as a result of the logging in my local forest I doubt if I will see them there again in my lifetime.

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

South Australia has been 100% plantation based for decades and approximately 90% of the sawn timber in NSW, Victoria and QLD. comes from plantations. Most if not all housing timber needs can be met from plantation sources. Innovative products are replacing timber whether its concrete sleepers, fiberglass electricity poles that don't burn, or flooring and decking made from recycled plastic. Nevertheless, timber has a role to play as a sustainable product that acts as a useful carbon sink and if managed responsibly while growing and during harvest can confer a large range of useful environmental benefits as well.

While the native forest logging industry is directly employing a decreasing number of people and costing the taxpayer a significant amount of money the people involved are important. A socially just transition toward a plantation based future is needed. Fortunately, many of the skills needed to log native forests are very transferable to the plantation sector and plantations are best grown in the same regional areas as the state public forests.

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

With a growing population, we will probably need more timber in the future. As softwood and hardwood plantations already provide approximately 90% of our timber these could be expanded using already cleared farmland. The money spent subsidizing and propping up the current system could be used for this purchase.

Farm forestry with an emphasis on timber production complementing existing agricultural activities could supplement supply. This is a very different model from the earlier failed managed investment schemes which were very poor from both a social and timber production point of view. I manage a small, registered plantation on our Mid-North Coast farm. With appropriate management large eucalypts are growing at a rate of approximately 2cm. per year making them harvestable in a 30 -40 year time frame.

Successful farm forestry on a larger scale can be seen in the Lismore- Kyogle area where one business, Super Forest Farms has established more than 500 ha. of plantations spread over eleven properties. Over the last twenty years I have seen the development of their plantations. These feature, mixed forests of durable eucalypts which are thinned, pruned and grown in an integrated saw log production business.

At this year's Kyogle field days, one of the owners of this business gave a presentation explaining their approach to forestry operations. They have successfully refined their business so that they are a far cry from the Forestry NSW sponsored farm plantations of the 1980's and 1990's. Many of these have been unsuccessful due to the lack of follow-up management. In more recent times an organization helping to provide this essential management is the Australian Agroforestry Foundation through their Master Tree Growers and Peer Mentoring programs.

A recent report discussed the need for clear technical advice during the establishment and management of farm forests and highlighted the opportunities available in North East NSW.

(241008012806_FinanciaevaluationofhardwoodplantationsNENSW_050824_Final.pdf
(nenswforestryhub.com.au))

Private native forestry logging inherently has many of the same problems as NSW Forestry Corp logging. Endangered wildlife like Koalas and some of the glider species are just as affected by the removal of feed and den trees regardless of land tenure.

██████████ in my part of the Mid North coast have told me that some private blocks are logged and then burnt to create pasture for cattle, or they are clear-felled, tidied up and fenced so they can be sold off as a small acre hobby farm. In one case that I've seen the owner wanted to cut some saw logs but ended up with the contractor illegally removing logs from the adjoining state forest and a neighbour's property as well. It seems that governance problems are not just limited to the illegal practices of Forestry Corp, ██████████

Topic 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

To maximize the delivery of environmental outcomes such as enhanced biodiversity and carbon capture, post logging management is often needed. (Transformation in the forest: the role for restoration in the transition away from native forestry in Australia - McCormack - 2024 - Restoration Ecology - Wiley Online Library)

Recent research in Northern NSW has shown that the 'natural regeneration' of forests is often ineffective at restoring an ecosystem to its historical trajectory. Site rehabilitation in these areas should include ongoing management of invasive weeds particularly those like Lantana that minimize natural regeneration and provide a breeding incentive for Bell Miners and the associated BMAD. (An independent review of bell miner associated dieback (nsw.gov.au))

Post logging management would also help Australia meet its emission reduction targets and biodiversity obligations under the newly signed Kunming-Montreal Global Biodiversity Framework.

State forests also have the potential to play an important role in providing abundant clean water from water catchments. Rapidly growing coastal towns need a secure supply of clean fresh water, and mature forests can deliver this, in contrast to the more 'thirsty' young regrowth areas.

The long talked about but still stalled, Great Koala National Park is one example of an economically and environmentally viable alternative use of mature native forests. Studies have suggested that recreational activities and associated accommodation and hospitality industries would create more jobs and economic activity than the current public subsidized logging.(Hrf.com.au)

Based on observations of Indigenous joint management of nearby National Parks such as Gaagal Wangaaan, there is scope for the joint management model to enhance the preservation of archeological sites and the cultural use of forest areas.

Topic 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

In theory, carbon credit schemes are good in that they enable the community to reduce greenhouse gases at the least available cost. In practice as Ross Gittins points out carbon credit schemes are notorious around the world for being dodgy or downright fraudulent' (<https://www.theage.com.au/business/the-economy/let-s-all-be-more-positive-towards-nature-but-how-20240928-p5ke84.html>these)

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Logging mature forests which are better carbon dioxide sinks than the subsequent vegetation and then trying to claim carbon credits is both poor practice and suspect accounting. If a carbon credit scheme did not produce real cuts in carbon dioxide in the atmosphere, Australia would not genuinely reduce its emissions and this would not be socially acceptable either in Australia or overseas.

Regarding biodiversity credits, climate change and biodiversity loss are two interwoven crises. The closer the condition of an ecosystem is to its intact natural condition the better it is at absorbing carbon dioxide and providing habitat for maximum biodiversity. Logging mature forest in northern NSW , a biodiversity hotspot, adds to both deleterious climate change and biodiversity loss. The best contribution to help solve these problems would be to stop logging mature forests.