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

Forestry operations in native forest are sustainable in their current form only to the extent that they could continue to produce timber over the next 30 year period.

Economically, these operations are unsustainable as Forestry Corporation NSW has reported losses from their native forest operations, despite receiving significant Government subsidies. However, forestry operations in plantations have been relatively profitable.

Plantation timber provides the bulk of that used in the building industry and only a small fraction comes from native forestry operations. Timber sourced from native forests is not a unique product and could be replaced by plantation timber and other alternatives. Australia exports timber from plantations and there should be sufficient production to replace that from native forests. From an economic perspective native forest timber harvesting should stop and the timber supply should be based entirely on plantations.

Environmentally, Forestry Corporation NSW considers that its current forestry operations in native forests are sustainable due to thorough pre-harvest preparation which takes into account the function and requirements of the forest ecosystem. However, when harvesting commences on the varied and often challenging terrain of native forests it is difficult to comply with the suite of restrictions required for protection of threatened species and the broader health of the forest ecosystem. This is particularly the case when heavy machinery is employed during harvesting and when forest operations intensify as they have in recent decades. Accidental breaches of harvesting regulations are almost inevitable and Forestry Corporation has been prosecuted for such breaches. Compliant harvesting will require increased supervision and careful operations. This is more time consuming and is not economically viable. It can only continue with significant outside financial assistance. From the environmental perspective it will be more cost effective to cease harvesting from native forests and allow harvested areas to generate older, healthier forest. Plantations embedded within native forests along the Great Dividing Range face similar issues for harvesting. They also face other environmental issues due to the clear-fell harvesting methods and relatively short rotation times between harvests. This does not permit the development of some important habitat features, such as large hollow trees. Existing habitat trees are retained, but in practice these trees then remain isolated or in small clumps until substantial regrowth develops around them, which may require a decade. During this period they are subject to increased stress due to severe weather, while their isolation restricts access by hollow-dependent fauna species. Plantation forests can provide habitat for only part of the overall forest ecosystem. The even-aged plantations tend to generate higher intensity wildfires than mixed-aged native forests. Unless they can be protected from extreme fire events they are likely to suffer incremental decline in environmental value with successive harvests. Plantation forests are only in their second cycle of the current management protocol (<https://www.forestrycorporation.com.au/operations/> accessed 03/10/2024), which is insufficient to determine the effects of many cycles on environmental values.

Plantation forests occupy a relatively small area within native forests along the Great Dividing Range and they should not be harvested, but should be managed to allow them to return to

healthy native forest. This would also increase the value of tourism and other activities in native forests along the ranges as visitors will not encounter harvesting operations.

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

Healthy native forests provide valuable water catchments. They also form part of the biodiversity of life in Australia, which can be utilised in research for new products in food, medicine, agriculture and tourism. This research is ongoing and productive and it is important to preserve as much of this biodiversity resource as possible.

The unique nature of our biodiversity is an asset for tourism. Koalas have world wide appeal to tourists and Greater Gliders could join them. An end to timber harvesting in the area proposed for the Great Koala National Park and areas of core habitat for Greater Gliders could assist the development of tourism opportunities based on these and other threatened species.

Large hollow trees also have potential for tourism as well as providing essential habitat for many fauna species. Some particularly large trees in native forests are currently protected and maintained with nearby facilities for visitors. This practice could be easily expanded to further promote tourism and education about forest ecosystems.

Approximately half of the forest estate of NSW State Forest and National Parks was burnt during the wildfires of 2019-20 and large hollow trees were significantly impacted. On the property where I live and in the adjacent Biriwal Bulga National Park approximately half of the large hollow trees were destroyed. This resulted in local populations of hollow-dependent fauna being decimated and in some cases eliminated. Nearby unburnt forests have an important role to play in providing the recruitment resources of plants, animals, fungi and micro-organisms to assist the regeneration of healthy forests. They should be allowed to provide this function without disruption from timber harvesting. Meanwhile, burnt areas of forest provide new habitat for the succession of insects and fungi which thrive in burnt and dead wood. It will be more useful for the long-term health of forest ecosystems to allow natural processes to occur rather than to harvest the burnt timber by 'salvage' operations which will disrupt the regeneration. Salvage harvesting will also provide habitats favouring invasive species which will further disrupt regeneration.

Forestry Corporation addresses invasive species issues in plantation forests with methods such as herbicide application (<https://www.forestrycorporation.com.au/operations/> accessed 03/10/2024), which would be inappropriate in native forests where biodiversity should be protected.

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

Softwood and hardwood plantations currently provide the bulk of timber supply needs within Australia. Over recent decades supplies of sawn timber from native forests have decreased while those from plantations have increased. Expansion of plantations could entirely replace timber from native forests. New plantations should be located outside native forests and preferably on land which does not require clearing. Although plantations should ideally be located close to timber processing areas they may benefit from locations away from native forests as surrounding cleared lands should allow more effective fire management. Plantations currently within native forest areas should be phased out and allowed to regenerate their potential for conservation and other values.

The timber industry will need support and sufficient time to allow an orderly transition away from harvesting in native forests and in those plantations within native forests. As a first step, harvesting should cease in the proposed Great Koala National Park and in areas of core habitat for Greater Gliders. When current wood supply contracts end they must only be renewed for the

limited time necessary for the transition. Any new timber allocation levels must be determined by up to date assessments of the timber resource, with allowance for negative impacts such as large scale wildfires.

Private Native Forestry is likely to be unable to contribute significantly to timber supply while complying with environmental regulations. However, Private Native Forests may be able to provide timber for local niche markets by employing small scale harvesting methods and portable on-site mills. The use of light machinery and low-intensity selective harvesting may be able to comply with the environmental restrictions needed to maintain a healthy forest.

Plantations on private land have potential to efficiently supply larger quantities of wood products, particularly in association with the experience and expertise available in Forestry Corporation.

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

If timber harvesting terminates in Native Forests and in the embedded Plantations then the role of Forestry Corporation in Native Forests will shift from an emphasis on timber production to that of other forest values. Forestry Corporation currently provides a range of infrastructure and facilities for visitors to native forests. This work can be expanded in native forests to provide increased access for visitors engaging in tourism, educational and recreational activities. Forestry Corporation may also be well placed to manage the Native Forests to maximise biodiversity and other environmental values such as water quality.

Extreme wildfires pose an increasing threat to healthy forests and Forestry Corporation's experience in fire management will be required in order to address it. Aboriginal forest management has been promoted as an alternative to typical hazard reduction burns and some cultural burns have been implemented. Plantations within Native Forest have existing access road networks and they can provide potential sites for comparisons between the different management models.

Forestry Corporation will play an important role in the transition to timber sourced from plantations outside native forests. The accumulated expertise and experience in Forestry Corporation will assist the planning and implementation of new plantations on private land and indirectly assist development of new employment opportunities.