

Public submission

NAME REDACTED

Submission ID: 204906

Organisation: *Forest Advocacy Ministry Committee*

Location: *New South Wales*

Supporting materials uploaded: *Attached overleaf*

Submission date: 10/13/2024 3:07:26 PM

Submission template

The Independent Forestry Panel has been appointed to lead consultation on the sustainability of current and future forestry operations in NSW, ahead of the NSW Government developing its Forestry Industry Action Plan. The Panel is tasked with consulting and reporting to Government on the best options to achieve the balance between sustainable supplies of timber and NSW's environmental commitments.

The Panel is seeking your views on the sustainability of current and future forestry operations in NSW. This includes forest conservation, public and private native forestry, softwood and hardwood plantations, different land tenure and management regimes, timber supply, and non-timber forest uses such as recreation, apiculture and others.

The Panel invites written submissions from individuals and organisations on the sustainability of current and future forestry operations in NSW. The Panel would like to hear from a broad range of stakeholders, including representatives from the timber industry, forest growers, environment groups, unions, Aboriginal communities, local government, business, related industries, tourism and scientific experts.

Please structure your submission to address any or all of the topic areas below, including if and how you think current practices can improve. Please indicate the timeframe for any suggested changes, and the implications for both industry and the environment over the next 30 years.

Topic areas to address (overleaf):

- Sustainability of current and future forestry operations in NSW
- Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values
- Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail
- The future of softwood and hardwood plantations and the continuation of Private Native Forestry in helping meet timber supply needs
- 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
- 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.

Following this structure will help the Panel respond to some of the issues the Government has identified for inclusion in its Forestry Industry Action Plan. However, a submission that doesn't follow this structure can be uploaded to the submission portal and will also be accepted and considered by the Panel.

If your submission includes citations of evidence from published reports, please include full references for those materials.

Your submission

Thank you for the opportunity to make a submission to the Independent Forestry Panel. The Forest Advocacy Ministry Committee (FAMC) is a committee of the Uniting Church in Australia Mid North Coast Presbytery and comprises members of the Uniting Church and the Religious Society of Friends (Quakers). We stand in solidarity with the forests of NSW and all who depend on them.

1. Sustainability of current and future forestry operations in NSW

Current forestry operations in the native forests of NSW are unsustainable. Logging of native forests on public and private lands should be stopped in order to protect the biodiversity values, ecosystem services and cultural values of native forests.

Less than half of the area of forests and woodlands that existed in NSW prior to European colonisation remains (Ward *et al.* 2024). Large parts of the remaining forests were impacted by the Black Summer bushfires, including 42% of state forests and 37% of the national parks estate, with 293 threatened animal species and 680 threatened plant species occurring in the fire ground (DPIE 2020). It can take many years for affected forests to recover from bushfires; up to 120 years for some threatened species (Smith 2020). A recent study showed that the habitat of at least 150 species listed as threatened in NSW by the Australian Government is impacted by contemporary logging, over half of the species assessed in the study (Wards *et al.* 2024). The forests of NSW are increasingly at risk from bushfires due to climate change (Abram *et al.* 2021) and logging also increases the severity at which forests burn (Lindenmayer *et al.* 2021). Moreover, logging in the public native forests of NSW is uneconomic, with the hardwood division of Forestry Corporation of NSW making substantial losses in recent years (Frontier Economics 2023). Continuing to log the native forests of NSW in this context is neither sustainable nor defensible. NSW should follow other states and end native forest logging.

References:

Abram, N.J. *et al.* (2021). 'Connections of climate change and variability to large and extreme forest fires in southeast Australia', *Communications Earth & Environment*, 2(8). Available at: <https://doi.org/10.1038/s43247-020-00065-8>

DPIE (2020). *NSW fire and the environment 2019-2020 summary*. Sydney: State of NSW and Department of Planning, Industry and Environment. Available at: <https://www.environment.nsw.gov.au/research-and-publications/publications-search/fire-and-the-environment-2019-20-summary> (Accessed 30 July 2024).

Frontier Economics (2023). *Public native forest logging: a large and growing taxpayer burden*. A report for the Nature Conservation Council, November. Available at: <https://www.frontier-economics.com.au/public-native-forest-logging-a-large-and-growing-taxpayer-burden/> (Accessed 25 August 2024).

Lindenmayer, D. *et al.* (2021). *How does climate affect bushfire risks in the native forests of south-eastern Australia?* Bushfire Recovery Project Report No.1. Griffith University and The Australian National University. Available at: <https://www.bushfirefacts.org/> (Accessed 3 September 2024).

Smith, A.P. (2020). *Review of CIFOA mitigation conditions for timber harvesting in burnt landscapes*. Report to the NSW EPA, 17 September. Available at: <https://www.epa.nsw.gov.au/your-environment/native-forestry/bushfire-affected-forestry-operations> (Accessed 30 July 2024).

Submission template

Ward, M. *et al.* (2024). 'Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species', *Conservation Science and Practice*, 4 August. Available at: <https://doi.org/10.1111/csp2.13185>

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

Forests are home to countless life forms, each of which has their intrinsic worth. In NSW, there are some 484 threatened terrestrial and peri-terrestrial species that depend on forests (Ward *et al.* 2024). Their survival and recovery is highly important. In the words of the Uniting Church in Australia Assembly (1991), "God loves the divine creation and wills the development of its life. No creature is indifferent in the eyes of God. Each has its dignity and thereby also its right to existence." Quaker Helen Gould (2009) comments that: "Trees, plants and other life-forms are like us: they breathe and drink; they eat and excrete, they are born, re-create their kind and die. Like us they are subject to the rhythms of day and night, the pull of the moon's tides, magnetism and gravity ... I have come to know, sensuously, that community includes all beings ..."

Forests also provide crucial ecosystem services which humans rely upon for our wellbeing. Forests regulate the climate, store carbon, produce oxygen and play a key role in supplying clean water, and they also mitigate floods, landslides and other natural disasters (FAO and UNEP 2020; WWF n.d.). The Religious Society of Friends (2008) expresses a commitment to which FAMC would like to see the NSW government and community as a whole aspire: "We ... strive to live a just life which values the air, the waters, the soil, living things and the processes sustaining all life". In native forests, this means ceasing logging and managing them to protect and enhance their environmental values.

The forests of NSW are the homelands of Aboriginal peoples, home to sacred sites and totemic species and crucial to their cultural heritage. Speaking of Newry State Forest on the NSW north coast in July 2023, Gumbaynggirr Elder Uncle Bud Marshall said, "I have lived on and protected my land my whole life. My cultural knowledge was taught to me from a long line of Gumbaynggirr grandmothers and grandfathers. Our cultural knowledge and stories are in this forest. There are machines and gates, cameras and security guards planted on our sacred land, stopping us from walking on our country. They are destroying our land and our culture. We must stop them and protect what we have left. Once it's gone, it's gone" (Whaler 2023). FAMC recognises the sovereignty of Aboriginal peoples and supports their defence and maintenance of the cultural and ecological values of Country.

References:

Gould, H. (2009). *The Quaking Meeting: transforming our selves, our meetings and the more-than-human world*. Backhouse Lecture, delivered to Australia Yearly Meeting. Available at: <https://www.quakersaustralia.info/sites/aym-members/files/pages/files/2009%20Lecture.pdf> (Accessed 3 September 2024).

Religious Society of Friends (Quakers) (2008). *Earthcare statement*. Available at: <https://www.quakersaustralia.info/friends-statement-earthcare> (Accessed September 3, 2024).

Uniting Church in Australia Assembly (1991). *The rights of nature and the rights of future generations*. Available at: <https://ucaassembly.recollect.net.au> (Accessed 3 September 2024).

Ward, M. *et al.* (2024). 'Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species', *Conservation Science and Practice*, 4 August. Available at: <https://doi.org/10.1111/csp2.13185>

Submission template

Whaler, J. (2023). 'Gumbayngirr Elders physically removed from Sacred Land in Newry State Forest', *National Indigenous Times*, 31 July. Available at <https://nit.com.au/31-07-2023/7001/gumbayngirr-elders-physically-removed-from-sacred-land-in-newry-state-forest> (Accessed 9 September 2024)

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

FAMC does not have comments on this topic area.

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

Plantations already provide some 90% of the sawn timber produced in Australia. FAMC supports the ending of native forest logging and a transition to a solely plantation-based industry (softwood and hardwood), including the development of plantations on land that has already been cleared, as well as increased recycling of used hardwood.

However, there are areas classified as hardwood plantation in northern NSW that are prime habitat for the endangered koala (Cadman *et al.* 2023), including, for example, parts of Pine Creek and Tuckers Nob state forests which are crucial for habitat connectivity in relation to the proposed Great Koala National Park. Hardwood plantations should therefore be assessed and areas of high-quality habitat for koalas and other threatened species should not be logged but rather conserved into perpetuity.

References:

Cadman, T. *et al.* (2023). 'Koalas, climate, conservation, and the community: a case study of the proposed Great Koala National Park, New South Wales, Australia,' *The International Journal of Social Quality*, 13(1), pp.25-55. Available at: <https://doi.org/10.3167/IJSQ.2023.130104>

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

FAMC is deeply concerned about the forest management practices of Forestry Corporation of NSW (FCNSW) and doubts its capacity to manage state forests in the public interest. FCNSW has a track record of repeatedly breaching its conditions of approval (Pepper and John 2024). On its website, the NSW Environment Protection Authority (EPA) lists more than 50 formal investigations that have commenced and/or concluded since 2020 into FCNSW's operations in public native forests (NSW EPA 2024b). So far more than 30 of these investigations have resulted in enforcement action such as warnings, cautions, orders, penalty notices, enforceable undertakings, prosecutions and more (NSW EPA 2024a, 2024b; Pepper and John 2024).

The breaching is egregious and includes logging in prohibited areas, felling giant and hollow-bearing trees, failing to abide by post-bushfire conditions and more (Pepper and John 2024). In late 2023, Wilderness Australia, WWF-Australia and South East Forest Rescue alleged that at least 1,215 den trees of the endangered southern greater glider were illegally logged or had logging occur inside their exclusion zones in Tallaganda State Forest (Ashman, Wong and Daines 2023). A July 2024 judgment of the Land and Environment Court concerning illegal logging in Yambulla State Forest after the Black Summer bushfires in 2020 stated that FCNSW "has a pattern of environmental offending, has not provided any compelling evidence of measures taken by it to prevent its reoffending, and does not accept the true extent of harm that it has caused by its offending" (*EPA v. FCNSW 2024*, clause 145).

Submission template

In addition, although it will take years for the forests affected by the Black Summer bushfires to fully recover, FCNSW refuses the continuation or development of restrictions on logging in fire-affected forests (NSW EPA 2023).

Logging in public native forests should be stopped, and it is clear that reform of FCNSW is also needed so that the Corporation operates within the confines of the law and regains the trust of the community.

Aboriginal peoples have never ceded their sovereignty over the forests of the lands now known as NSW. FAMC echoes their calls for the care of forests to reflect their sovereignty, including through Aboriginal management and joint management.

References:

Ashman, K., Wong, A. and Daines, S. (2023). *What extinction looks like: A report on den tree logging breaches in Tallaganda State Forest*. Wilderness Australia, WWF-Australia and South East Forest Rescue, 10 November. Available at: https://www.wildernessaustralia.org.au/tree_logging_breaches (Accessed 26 June 2024).

Environment Protection Authority v. Forestry Corporation of New South Wales [2024] NSWLEC 78. Available at: <https://www.caselaw.nsw.gov.au/decision/191025c8c3849ddaec6b6ba2> (Accessed 13 August 2024).

NSW EPA (2023). *Bushfire-affected forestry operations*. Page last updated 3 August 2023. Available at: <https://www.epa.nsw.gov.au/your-environment/native-forestry/bushfire-affected-forestry-operations> (Accessed 14 August 2024).

NSW EPA (2024a). *News*. Available at: <https://www.epa.nsw.gov.au/news> (Accessed 7 September 2024).

NSW EPA (2024b). *Register of Crown forestry investigations*. Page last updated 9 August. Available at: <https://www.epa.nsw.gov.au/your-environment/native-forestry/regulating/register-of-crown-forestry-investigations> (Accessed 29 August 2024).

Pepper, M and John, J. (2024). *Breaches: Profiling the recent history of logging breaches by Forestry Corporation of NSW*. Redfern: Forest Advocacy Ministry. Available at <https://www.unitingearthweb.org.au/forests/>

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

FAMC does not have comments on this topic area.

After filling in this submission template, please upload the completed submission to our online submission portal, linked [here](#). When you upload your submission successfully, you will receive a confirmation email from us. If you don't receive a confirmation email, please check your Junk Email folder. If you have further issues, please email forestryiap@ipc.nsw.gov.au for assistance.