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

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23rd September, 2024

Independent Forestry Panel:

Peter Duncan AM (Chair), Professor Mary O’Kane AC and the Hon. Mick Veitch.

<https://www.ipcn.nsw.gov.au/cases/2024/08/independent-forestry-panel>

This submission is written on the Traditional Lands of the Gathang speaking people, Biripi and Worimi Country.

Gloucester Environment Group (GEG) is an incorporated volunteer organisation with over 120 members who reside in or near the Gloucester Township in the MidCoast Council region.

GEG members provide, assist and plan for environmental enhancement projects in our region and take a keen interest in the state of our natural environment and natural resource management.

We take this opportunity to state our concerns regarding the sustainability of current and future forestry operations in NSW, primarily focussing on the native forests under Forestry Corporation NSW management, so simply expressed by John Williamson in his 1989 song Rip Rip Woodchip

What am I gonna do?

What about the future?

Gotta draw the line without delay

Why shouldn't I get emotional?

The bush is sacred

Ancient life will fade away

Over the hill I go

Killing another mountain

Gotta fill the quota

Can't go slow

Huge machinery

Wiping out the scenery

One big swipe like a shearers blow

Rip rip wood chip

Turn it into paper

Throw it in the bin

No news today

Nightmare dreaming

Can't you hear the screaming

Chainsaw I saw more decay

Remember the axeman knew their timber

Cared about the way they brought it down

Crosscut black but tallowood and cedar

Build another bungalow pioneer town

I am the bush and I am koala

We as one go hand in hand

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I am the bush like Banjo and Henry  
Its in my blood gonna make a stand  
Rip rip wood chip  
Turn it into paper  
Throw it in the bin  
Don't understand  
Nightmare dreaming  
Can't you hear the screaming  
Stirs my blood gonna make a stand

Source:LyricFind Songwriters: John Robert Williamson Rip Rip Woodchip lyrics © Kobalt Music Publishing Ltd.

The community of our MidCoast region is acutely aware of the fragile state of our natural environment. Extreme climatic events (<https://www.climatechange.environment.nsw.gov.au/impacts-climate-change/weather-and-oceans/storms-and-floods>) and excessive land clearing, directly threaten the welfare of our remaining natural areas. The continued and unabated industrial scale logging practices of the Forestry Corporation NSW (FCNSW) are heartbreaking to witness and directly, adversely impact on our shared social, cultural and economic well-being.

Climate Change highlights just how unsustainable FCNSW logging practices are.

The 2019-2020 bushfires had severe negative impacts in the MidCoast region. 21% of all mapped Areas of Regional Koala Significance (ARKS) across the MidCoast were burnt; many at moderate or high fire severities. The Crowdy Bay, Comboyne, Khappinghat and Kiwarrak ARKS were all severely impacted. Fortunately, the southern half of the MidCoast LGA was spared from significant bushfire and, in the aftermath of 2019, acted as regionally important unburnt refugia. (MidCoast Koala Conservation Strategy 2.6.4 <https://www.midcoast.nsw.gov.au/Your-Council/About-MidCoast-Council/Plans-strategies-and-policies/Other-strategic-plans/MidCoast-Koala-Conservation-Strategy>)

The Wildlife and Threatened Species Bushfire Recovery Expert Panel (2020) stated the 2019/2020 Black Summer fires were an ecological disaster. In 2021 the Natural Resources Commission Report on the Coastal Integrated Forestry Operations Approval (IFOA) stated that native forests are at risk of serious and irreversible harm from the cumulative impacts of fire and harvesting. The IFOA report recommended that logging should be suspended for three years in Taree, one of the three extreme risk regions in NSW recuperating from the 2019/20 fires. But that didn't happen. Unconscionably, FCNSW began logging in Yarratt State Forest (known unburnt Koala hub) in 2021, regardless of advice. Their action demonstrated disregard for scientific opinion and the welfare of wildlife.

The key finding of the NSW Biodiversity Outlook Report 2024 is that biodiversity is in decline in NSW. (<https://www2.environment.nsw.gov.au/news/nsw-biodiversity-outlook-report-2024>) According to that report, FCNSW's native forest logging have a professed aim to ensure forests are managed in an ecologically sustainable way in perpetuity "to øgrow the value of forest estate and manage the range of identified values including environmental conservation, tourism and recreation and renewable timber production while also supporting rich biodiversity and wildlife populations. On the ground, we don't see that. In fact, the current management of our State Forests is resulting in potentially irretrievable habitat and biodiversity loss to the North Coast Bioregion (The NSW North Coast bioregion has over 370 threatened animal and plant species. <https://www.environment.nsw.gov.au/topics/animals-and-plants/biodiversity/bioregions/bioregions-of-nsw/nsw-north-coast>).

Key findings in the 2021 NSW State of the Environment Report (<https://www.soe.epa.nsw.gov.au/key-findings>) include:

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- The effects of climate change are already evident, but these will become broader and intensify in the future
  - The number of species listed as threatened in NSW continues to rise. These species are at the greatest risk from threats including vegetation clearing, the spread of invasive species and the mounting impacts of climate change
  - The condition of most native vegetation continues to deteriorate. Since the Black Summer fires of 2019-20, 62% of vegetation in the fire zone is under pressure from too much burning. Importantly, native forest logging has documented impacts on both the quantity and quality of water supplies where logging occurs, with serious implications for many NSW coastal and hinterland communities including in the MidCoast. Most Australian streams and rivers have their headwaters in forested catchments which are, in many cases, open to logging (Campbell, I. & Doeg, T. Impact of timber harvesting and production on streams: A review. *Marine and Freshwater Research* 40, 519-539, doi:<http://dx.doi.org/10.1071/MF9890519> (1989) . The Bulga State Forest (currently being logged), home to the Yellow Bellied Glider and Koala, is at the headwaters of the Hastings and Manning catchments. A number of citizen science events have been held in the logging compartments to identify glider den trees missed during FCNSW assessments.

Wallaroo State Forest (a considerable portion slated for permanent destruction with a proposed extensive hard rock quarry project - Port Stephens Council area) is within the Williams River Catchment and Grahamstown drinking water catchment “ home to a range of threatened species and an area which provides habitat connectivity through to the MidCoast.

MidCoast Council on behalf of and in response to the community, have sought moratoriums on both Bulga Forest logging and Kiwarrak State Forest logging (within Kiwarrak ARKS), where the local community submitted a proposal to the State Government to create a Flora Reserve over part of Kiwarrak which would see critical Koala habitat protected from logging and potentially enhance the greater forest estate. (see reference below 4.5 Advocacy, funding and partnerships)

There's a clear picture that the current management of native state forests in our region is resulting in potential irretrievable habitat and biodiversity loss. Compare FCNSW's cavalier approach to Koala conservation and that of MidCoast Council's measured Koala Conservation Strategy ( <https://www.midcoast.nsw.gov.au/Your-Council/About-MidCoast-Council/Plans-strategies-and-policies/Other-strategic-plans/MidCoast-Koala-Conservation-Strategy> ); This is a Strategy for Council that aligns and integrates the Council actions with the efforts of other stakeholders, including government agencies, organisations, and the broader community. Council, as the closest tier of government to the community, is well placed to lead the delivery of some koala recovery and conservation actions, and to support others. Council can also lead, advocate, research and play a coordinating, collaborating, or informing, role.

Effective koala conservation will not be delivered by continuing the approaches of the past.

Business as usual / the status quo is not going to achieve the outcomes that are needed.

Generally, conserving and recovering the koala on the MidCoast will require five (5) informed action platforms to be delivered in a system with adequate resources, delivery frameworks and processes. These action platforms are:

1. Safeguarding koala habitat (whether occupied or unoccupied) through tools and mechanisms that avoid the progressive loss and decline of important habitat ( œavoiding loss ), and
2. Strategically delivering effective conservation action, habitat restoration, new habitat creation and increased reservation of important habitat, and
3. Systematically controlling the threats affecting koala survival and successful reproduction, as well as securing the dispersal / movement needed to support the resilience and integrity of long-term populations,
4. Effective, efficient, and targeted auditing, performance monitoring and feedback loops, and

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## 5. Community education, communication, and engagement

### 4.5 Advocacy, funding and partnerships

Further, there are approximately 6,000-hectares of Council natural area reserves across the MidCoast, some of which provide important koala habitat. This is only a fraction of the total land area on the MidCoast. It is essential that actions within this Strategy can be delivered in a coordinated manner with our partners, and the community.

It is important to note that some of the issues associated with koala management, such as the issue of logging in public State Forests, is not regulated by Council. Public forestry is managed by the NSW Government through the Forestry Corporation of NSW. It is regulated by the NSW Environment Protection Authority and reviewed by the Natural Resources Commission.

MidCoast Council has a history of science-backed advocacy. For example, on the 8 February 2023, MidCoast Councillors unanimously supported a notice of motion to advocate to NSW Forestry and National Parks for a cease to logging in compartments 41 and 43 of the Bulga Forest and transition these compartments to National Parks, and advocate to the NSW Government to develop a plan for the transition of Forestry's native forest sector to ecologically sustainable plantations .

In September, Mayor Pontin of MidCoast Council wrote to the NSW Forestry Corporation asking that the proposed logging in compartments 7, and 10 – 13 in Kiwarrak SF be substantially postponed or abandoned because:

- The koala population within this forest was reduced by 50 to 80% because of the 2019 bushfires. The planned introduction of logging activities at this time has the potential to physically endanger and add to the stressors affecting the remaining, depleted koala population, thus markedly inhibiting its recovery,

Council's partner in koala recovery and conservation activities, the Hunter LLS has invested in ecological burning trials for koala recovery and conservation in this state forest. This is an important area of applied research. The planned logging will disrupt this research, The operation (particularly in Compartments 10 – 13) will likely be associated with significant controversy and community opposition. This has the potential to damage the MidCoast Regional Koala Partnership brand and the substantial positive momentum that has been generated to date. Timber harvesting at this time will potentially conflict with the positive narrative associated with providing koala safe spaces in the Kiwarrak ARKS that are intended to safeguard the koala population and allow it to recover from the combination of legacy and contemporary impacts (including the 2019 bushfires).

This Strategy prompts the continuation of advocacy to the NSW and Commonwealth Governments and other parties on local koala conservation matters.

It should be noted, FCNSW declined to participate in the community consultative committee that assisted Council in formulating the Koala Conservation Strategy which included representatives from other State Government land management agencies. Such action demonstrates FCNSW unwillingness to face public scrutiny and transparent dialogue.

Despite the assurances from the Chair and CEO of FCNSW ([https://www.forestrycorporation.com.au/\\_\\_data/assets/pdf\\_file/0008/1499255/forestry-corporation-nsw-annual-report-2022-23.pdf](https://www.forestrycorporation.com.au/__data/assets/pdf_file/0008/1499255/forestry-corporation-nsw-annual-report-2022-23.pdf)), we see no evidence that Forestry Corporation's statutory objectives are implemented or given equal balance on the ground. We see FCNSW continue to meet low value timber (and other use) contracts despite vocal community opposition and regardless of the valuable environmental functions our unburnt native forests perform for our wildlife refugia, catchment protection, carbon abatement and scenic amenity.

In 2023 a Frontier Economics report commissioned for the Nature Conservation Council of NSW found that FCNSW has been a financial drag on taxpayers over a very long period, losing \$30

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million over the previous two years (<https://www.frontier-economics.com.au/public-native-forest-logging-a-large-and-growing-taxpayer-burden/>).

It follows that it is no surprise, albeit unacceptable, that FCNSW is willing to sacrifice management and protection of the forest estate in favour of recovering, in the short term, higher financial return from forest material royalties.

([https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2012-096#:~:text=An%20Act%20to%20provide%20for,Forestry%20Act%201916%20and%20the%20Forestry%20Act%2012%20No%2096%20Current%20version%20for%2030%20October%202023%20Division%202%20Objectives%20and%20functions%20of%20the%20Forestry%20Corporation%20noting%20\(2\)%20Each%20of%20the%20principal%20objectives%20of%20the%20Corporation%20is%20of%20equal%20importance.](https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-2012-096#:~:text=An%20Act%20to%20provide%20for,Forestry%20Act%201916%20and%20the%20Forestry%20Act%2012%20No%2096%20Current%20version%20for%2030%20October%202023%20Division%202%20Objectives%20and%20functions%20of%20the%20Forestry%20Corporation%20noting%20(2)%20Each%20of%20the%20principal%20objectives%20of%20the%20Corporation%20is%20of%20equal%20importance.))

It is very concerning FCNSW are openly supportive of hard rock quarry developments (in our region, the Wallaroo State Forest at Balickera) on the spurious basis of ‘growing the value of the forest estate’ (<https://www.planningportal.nsw.gov.au/major-projects/projects/stone-ridge-quarry-project> Agency Advice, FCNSW Letter Advice on Stone Ridge Amendment Report 23/5/24). The consequential removal of vegetation, the change of land use and end use capability of Wallaroo State Forest to continue to function as an important wildlife corridor for threatened and endangered species, will be severely compromised and at worst, destroyed by the proposed hard rock quarry.

FCNSW proposes for the next 30+ years to ‘maximise the net worth of the state’s investment via the quarry royalties, but at what cost to the long-term, sustainable values the community attributes to the forest estate including the uncoded ecological functions forested areas provide? There is no evidence of community consultation taking place before the 2018 agreement between the then Minister, FCNSW and the proponent to authorise the Stone Ridge Quarry Project in the Wallaroo State Forest.

The justification that supports The Stone Ridge Quarry Project is that the Proponent will pay an undisclosed royalty to FCNSW for each tonne of quarry product sold. The Project proposes to extract 1.5 million tonnes per annum over 30 years.

The Bago Quarry (in the Broken Bago Forest (Hastings Council area), albeit a much smaller operation (200,000 tonnes per annum over 20 years) and located in a FCNSW hardwood plantation, commenced operations in 2022.

It is worth noting the proponent’s response to Hastings Council regarding submissions of objection in reference to overall economic impacts of their proposal “

Notwithstanding the matters set out above relating to new (quarry) employment numbers, the argument associated with the economic multiplier generated by new jobs created (as a consequence of the operation on the subject quarry), pales into insignificance when compared to the economic perspective of the Forestry Corporation of New South Wales. Firstly, Council will note the evidence submitted by the Forestry Corporation (in separate correspondence) that the financial yield from the recent harvesting of timber from the quarry precinct amounted to a figure of less than \$40,000. Council will also note from that evidence that the period of rotation for future harvests will be of the order of 40 years. Secondly, the value of the royalties flowing to the Forestry Corporation (from quarry operations) will be higher than the yield from timber harvesting by a factor of several hundred times. (Correspondence from DeGroot & Benson Pty Ltd their ref 14164, To- Port Macquarie Hastings Council, Attn: Chris Gardiner Re: DA 2015/953 - Development Application for Extractive Industry. Lot 161 and Part Lot 52 DP 754445, Broken Bago State Forest Bago Road, Herons Creek 6 December 2016, ANNEXURE A-1 -)

Further,

The ‘do nothing’ option is rejected by CTK NR and FC NSW on the basis that this option represents a considerable and significant lost economic opportunity. A shorter quarry lifespan of 20 years was investigated by the proponents. This option was found to be economically

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unattractive having regard achieving a financial return on investment on the cost of the capital outlay in establishing the quarry. FC NSW have provided a letter stating the commercial value for forestry timber harvesting operations within the land proposed for the quarry. The 'value' of the timber recently harvested within the subject site was \$38K. Quarry royalties from quarry operations will be significantly greater than the economic return from plantation timber. It is clear FCNSW supports these projects because of the opportunity for the economic return to FCNSW. It is fair to state that as far as the rural residential communities of Balickera and Wauchope are concerned, both quarry projects are strongly opposed. FCNSW fails to recognise that the State Forest estate is valued and seen as an economic and environmental asset in each locality, often underpinning and guiding Council regional planning. Changing the nature and fundamental purpose of a community's local Forest undermines social cohesion.

An example of alternate, economically profitable management options for Native State Forests and which reflects the potential for safeguarding the environment and our iconic Koala, lies in the formation of the Great Koala National Park (GKNP) on the Mid North Coast. (See [https://www.newcastle.edu.au/newsroom/featured/report-australias-first-national-park-for-koalas-projected-to-generate-\\$1.2-billion-in-economic-output-and-9,800-jobs](https://www.newcastle.edu.au/newsroom/featured/report-australias-first-national-park-for-koalas-projected-to-generate-$1.2-billion-in-economic-output-and-9,800-jobs) ) Unjustifiably, FCNSW and the State Government are loathe to protect the area from continued industrial logging, despite long stated Government support for the GKNP and vocal, continued public outcry about Forestry Corporation's belligerent and destructive industrial timber harvesting practices. FCNSW is viewed poorly in the community, not only because staff fail to initiate or participate in meaningful and transparent community consultation but because of FCNSW's aggressive refusal, despite all the evidence before them, to consult with local communities and to accept an outcome that fully acknowledges that we face a biodiversity extinction crisis. Our trees and remaining forests are worth more to the community left standing. Current forestry practices must change to adjust to the environmental crisis we face.

The fact that the Forestry Corporation runs at a financial loss and is heavily subsidised by the NSW taxpayer is shameful and an indictment of successive government mismanagement. The answer to making money for FCNSW lies not in 'flogging off' the estate to highest bidder " as we see with hard rock quarry proposals, and industrial scale logging techniques that drive our extinction crisis to primarily feed the wood chip industry - but in focussing on the potential for nature based tourism, community and environmental well-being and enhancement programs. The Forestry Action Plan must see to both change and improvement of FCNSW's damaging practices and operations. The FCNSW does not hold the social licence to operate. A new Forestry Action Plan must recognise that the community values our natural capital and that our shared prosperity depends on a healthy State Forest estate that supports our natural environment into the future. Industrial logging of our remaining native forests must stop. (The nature-based economy: How Australia's prosperity depends on nature, Australian Conservation Foundation Report, 2022, Pollination, Australian Ethical Investments, IDEEA Group).

Yours faithfully,

Megan Benson, Committee Member, Gloucester Environment Group.

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