

Public submission

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1. Sustainability of current and future forestry operations in NSW

Sustainability must be read in the wider sense, that is, are all of the values sustained over time, not simply 'can the logging industry continue to extract a constant volume of wood products' (regardless of diminishing quality)?

The history of the logging industry has shown that neither of the above are so.

It is unquestioned by any unbiased observer, that biodiversity, and catchment water yield declines following logging events. The flammability and erodability of the forested areas increases markedly. These effects are of decades to centuries in duration.

The numerous measures intended to demonstrate sustainability embodied in the CIFOA require timely and effective monitoring to have effect. This monitoring is simply not being done. The NRC is occasionally tasked to produce a report addressing one politically sensitive issue or another, but without genuinely independent and unbiased assessment, no assurance of sustainability is available.

The inexorably growing number of species recognised as threatened with extinction is proof of the failure, and this are available only because of the dedicated survey and research by community groups and the few interested academics. The NRC and other government research are almost without exception, foregone conclusions by design. The currently underway 'acoustic' Koala surveys are a prime example, recording the bellows of wandering males. This may tell us something of their desire to mate, and to scare off other males, but nothing at all about the females or their young, neither of which make these calls. The conclusion that will be drawn from the number of unsatisfied male Koala, is that there is a healthy population – nothing to worry about.

Any logging truck on the highway tells the sad story of the decline in quality and variety of the timber products derived from the forests. Scrawny little logs, compared to the grand old trees seen in the historical photographs. The 'minimum log specifications' are reduced every few years to allow the cutting down of trees that, only a few decades ago, would have been left to grow larger, such is the rapacious greed of those profiting by this destruction. Some towns still display a huge log, ironically boasting their timber 'heritage', and many of their fine, hundred-year old public buildings and houses are constructed and clad with timber beams and boards of dimensions simply unobtainable today.

The native forest logging industry is not sustainable because the logging (aka 'forestry') industry it depends on requires the 'regulation', or simplification of the mixed-age mature forests. The very

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basis of 'forestry science' is to reduce the diverse values of the forest to a manageable, predictable crop.

By repeated logging events, the forester seeks to reduce these rich, biodiverse and resilient ecosystems into single-aged predictable 'crops'. A crop that to properly mature may take centuries. '

'Harvests' are made every few decades, but this is heart of the problem. Only by maintaining the forest in an artificially immature state can a bulk yield even resembling a reasonable return on investment be extracted. The 'capital', that is the forests themselves, does not figure in this calculus, as this is granted to the logging industry gratis.

The inappropriate application of this agricultural cropping principle, in the concept of an simple 'rotation', and the subsequent 'harvesting' when applied to a forest's naturally mixed-age structure, over the multi-decadal, or even multi-century time to maturation results in forests that are fire and disease-prone.

Real-world forests, especially those in Australia, adapted as they are to our land of droughts and flooding rains, resist the forester's attempts to 'regulate' them. Some trees grow fast and tall, others form the sub-canopy. After a few decades, the complex structure is re-established, resilient to the vagaries of nature, re-establishing the complex biota alongside which they evolved.

The subsequent 'harvesting' operations are more of a 'smash and grab' logging of the few saleable stems, and the generation of vast amounts of low-value 'salvage' rather than the orderly procedure envisaged by the European pine plantation farmers.

The logging operations inevitably result in loss of habitat for the very many endangered species now largely restricted to these Crown forested areas, due to almost uncontrolled clearing of forests on private land.

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

Forests, especially the tall wet types sought after by the hardwood logging industry, are key habitat for many of the 1,000+ species recognised as in danger of extinction. An unknown number of other, as yet unrecognised but vital components of the biodiverse ecosystem that sustains life on Earth are also being driven out of existence by these misguided attempts to convert the biodiverse ecosystems into wood farms.

It is well recognised by social scientists, psychologists and ordinary folk that forests, especially these tall wet types, are sanctuaries of the mind and soul. Time spent walking, contemplating, enjoying these special, and increasingly rare places benefits well-being as do few other activities.

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Multiple disease processes are exacerbated by the frequent disturbance (a.k.a 'harvesting'). Myrtle Rust is of dire concern to the genuine botanical community. Phytosanitary controls are known to reduce the spread of this devastating fungus, but such are not in evidence in logging operations. Similarly, Bell-Miner Associated Dieback has for decades been recognised as a widespread and growing malady affecting hundreds of thousands of forests. Disturbance is well known to spread both.

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

Very little hardwood is used in the construction of 'normal' homes. The frames and trusses are exclusively plantation grown Pine. Kitchen and other MDF panelling are made from pine waste. Lintels are typically steel or laminated Pine. There is no need for this controversial and ecologically damaging activity to continue.

Few of the native forest hardwood products are adequately qualified for modern building applications. This is primarily due to the rapacious logging industry removing any 'marketable' stem and having little concern for the quality of the extracted product, nor of the depauperate forest that remains. The exaggerated 'sustainable yields' set as a political compromise at the inception of the CRA/RFA have resulted in a continuing decline in size and quality.

Electricity authorities, unable to obtain clear-grained hardwood for their 'cross trees', the arms that actually hold the wires atop the power poles transitioned to fibreglass several years ago. They have more recently announced a transition away from wooden poles, also to the more engineering-qualified and fire-resistant fibreglass.

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

Softwood plantations are typically well-defined, with necessary firebreaks, especially as extreme conditions are with us now, and will continue to worsen for the foreseeable future. It may be possible to continue to produce softwood timber from these. In contrast, what passes for hardwood plantations in the NSW Crown estate are in actuality just native regrowth forests, augmented with some seeding or planting. No regard whatever is paid to the clear definition in the Act

A very few, carefully and privately managed hardwood plantations have been able to produce quality products suited to high value furniture manufacture, but almost without exception, those hardwood plantations managed by the Forest Corporation have failed to produce valuable product.

The Forestry Managed Investment Schemes continue to cast a long shadow over the hardwood plantation industry. The over-optimistic claims of growth rates and product yields may be possible under optimal management and favourable climatic conditions. The former is only likely in small, privately managed woodlots, and the latter conditions are increasingly unlikely.

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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

The forests of the state do continue to deliver multiple benefits, in spite of appalling mismanagement by the Forest Corporation of NSW.

The environmental benefits are much diminished by the narrow focus on the delivery of exaggerated volumes of logs to an industry of previous era.

The claimed economic benefits in the preservation of a few jobs, reducing biodiverse ecological habitat to wooden pallets, firewood, and a tiny proportion of it into fashion furniture for the very rich is obscene.

The positive social outcomes of outdoor activities in unspoilt forests is undisputed.

There is no need for 'diverse management'. This is yet another 'wolf in sheep's clothing' by the logging industry. It is well known that forests, left unlogged, will mature, provide reliable water supplies, and become less prone to wildfire.

The recently-synthesised 'Aboriginal forest management models' are but a cynical effort by the current vested interests to maintain their hegemony.

The First Nations people of this land did doubtless conduct some burning to assist in their hunting activities. This is in no way comparable to the industrial-scale activities being introduced in their names, but hardly informed consent.

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

Climate resilience, carbon storage and biodiversity benefits will accrue in the forests if not further disturbed by industrial logging. It was recently demonstrated that the cessation of logging in the State Forests of NSW would sequester equivalent carbon to taking one-third of the vehicles off NSW roads. A long way towards meeting our Paris commitment – which we are far from at present.

The notion that these must be monetised to be recognised is false and a double-standard. Was the 'capital', ecological, hydrological or even silvicultural value of the forests evaluated before they were handed gratis to the logging industry?

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If so monetised, by the creation of tradeable carbon credits, the forest will be seen as the least-cost 'capture' of carbon, as they are indeed the only means available to draw down carbon at sufficient scale, and thus purchased by hard-core fossil fuel polluters to continue their climate-damaging activities. While destruction of the Crown forests might be slowed by this financial legerdemain, the climate continues to be destabilised.

The NSW DPIE has for some years heavily promoted the notion that disturbed (ie: logged) forests can somehow provide greater carbon benefits than those left unlogged. Commonsense, and the facts, tell us this is of course cannot be so. The proponents use highly selective, and distorted measures to support their false arguments. Although disseminated energetically, none of these have been subject to the blowtorch of peer-reviewed publication.

A prompt and unconditional end to the logging of public native forests is in the best interests of the State of NSW. There is no need to 'monetise' the transition. While attractive to some, this would have the perverse outcome of transferring the right to continue to pollute the atmosphere with carbon to others. The benefits of cessation begin to accrue immediately, it is the failure of our accounting systems to recognise the 'Triple Bottom Line' that leaves the benefits from our balance sheets.

The present-day techniques of the logging industry are similar to those used in roadwork and construction, those employees will have little difficulty in finding new placements. The sawmill workers in the larger centres will only need minor assistance in the form of TAFE training to take their place in the modern workplace. Those in the small towns without another industrial workplace may not be able to find similar occupation, so may require more substantial relocation or retrenchment support.

Care must be taken in planning this cessation to avoid 'leakage', as the contractors and especially the sawmill owners, will continue their logging activities unless regulated, increasing the destruction of the few remaining privately-owned forest lands. This is seen in loaded trucks bringing logs from Tasmanian forests across the Bass Strait to be sawn in Victorian sawmills. This activity could hardly be economic, and the several logging companies in receipt of some \$M's recently from the Tasmanian Freight Equalisation Scheme hints of an unintended, and probably corrupt, subsidy. These business owners are typically multi-million dollar enterprises, so should have no difficulty in redeploying their assets into less-controversial investments.

Those timber supply contracts, given to the logging and sawmill companies gratis, should be cancelled *de jure*, as they were unsustainable from the outset.

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