Independent Forestry Panel

Public submission

HANK BOWER Submission ID: 203876

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

Having worked across north east NSW in the CRA and the north west slopes conducting vertebrate fauna surveys in the mid to late 1990's and early 2000's I was exposed to the broad range of forest ecosystems, their fauna and habitat values and the various land management practices being undertaken. In 2007 I moved to Lord Howe Island for work and returned to live on the mainland in 2022. Over this time the way forests were managed had changed significantly.
The 2018 CIFOA protocols and procedures enabled much higher rates of timber removal including feed trees for threatened fauna (e.g. high value nectar trees for nectarivores such as Swift Parrot, Regent Honeyeater, Little Lorikeet, Squirrel Glider, Yellow-bellied Glider, Grey-headed Flying Fox and Eastern Blossom Bat, Allocasuarina species for Glossy Black Cockatoos, sap trees for Yellow-bellied glider and foliage for obligate folivores such as Greater Glider and Koala), as well as hollow bearing trees that are important for dozens of species. The CIFOA protocols for retaining hollows enables foresters to mark trees as hollow bearing if they have a basal cavity, which provide no habitat value for arboreal hollow dependent species and fails to protect the best hollows and hollow recruitment trees. This approach only leads to a decline of hollow bearing trees over time, which is simply unsustainable. The degree of forest modification I witnessed over the 15 years I was away was astounding. Many of the forests I knew as multi aged mixed species forests had been systematically converted to young forests with very low densities of hollows and often promoted the regeneration of single species (mostly Blackbutt Eucalyptus pilularlis).
Native forestry rules have resulted in the decline of forest age and structural complexity through amending the basal area retention rate to as low as 10% and reducing the sawlog size classes "allowed" for harvesting. The impact that native forestry (Private Native Forestry and State Forest combined) is having across the forested landscape of NSW has not been fully scientifically assessed. But we know that many hollow dependent species have experienced significant declines over the past two decades. During the CRA Greater Gliders were commonly encountered. Now they are scarce in many landscapes that have been subjected to forestry activities under PNF and CIFOA type regulations. For forestry to be sustainable it needs to have measures of success and a key measure is biodiversity. So long as biodiversity values are being reduced, forestry (PNF and State Forest) cannot be deemed sustainable. Current forestry practices aren't sustainable whilst they result in the continued loss of hollows through logging at intervals that do not allow hollows to regenerate, removal of large volumes of high value nectar producing eucalypts often at critical times for nectarivores and disturbance of important habitats via logging operations being conducted at peak breeding times and allowing logging in forests with residual populations of species that are sensitive to disturbance (e.g. Greater Glider).
The future of a sustainable forestry industry lies in moving out of native logging and investing in the establishment of softwood and hardwood plantations on cleared land. There are large amounts of cleared land that are suitable for plantations and incentives need to be provided to promote industry investment.

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

The NSW CIFOA and PNF forestry procedures and conditions do not provide adequate protections for threatened species and their habitat. For instance the provision of a 50m buffer for Greater Glider den trees has no scientifically substantiated basis and given the species is known to be negatively impacted by disturbance, increased temperatures (through opening of canopy by logging surrounding trees and increasing wind, sunlight radiation and drying of top soils) and fragmentation (including loss of hollow bearing trees) it is apparent that this species has been in steady decline over the past 20 years (which corresponds with the period that the RFA's have been in place). Ditto for Yellow-bellied Glider, which vocalizes so should be readily detected when surveyed for but is now becoming increasingly to detect in habitats it was once readily found from. Given the climatic change prediction of increased temperatures these species are likely to decline further under sustained logging of their habitat. Another example is the 50m buffer on raptor and Glossy Black Cockatoo nests. White-bellied Sea-eagle, Little Eagle and Glossy Black Cockatoo are all highly susceptible to abandon nests when disturbed. The level of disturbance by logging operations is significant as most operations now use heavy machinery and can remove up to 90% of basal area in some instances. The buffers and exclusions are not sufficient to ensure that threatened species, their habitats and their values will be protected. For instance the requirement for owl exclusion areas is not based on surveys of which owls are present and at what density or determine their home range (for each species). It just assumes all the exclusion area is suitable for owls.

many forests have suffered decades of over harvesting resulting in loss of hollow bearing trees and the fauna that rely on them to the extent that some forests have lost species or now only retain scattered remnant populations of threatened species. An example I am very aware of is in and around Newry State Forest on the NSW midcoast where a recent logging operation failed to identify Greater Gliders in their Ecology Report and Harvest Plan because there were no recent records. Local community members has subsequently found 7 locations spread across the forest and surrounds indicating there is a remnant population. To proceed with logging this area (which is what Forest Corporation intend to do) is likely to place this population at risk of local extinction.

The best way to protect environmental, cultural and aboriginal values of forests is to stop disturbing these values by ending native forest logging (PNF and State Forest) and establishing a plantation estate on previously cleared land.

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

Since the RFA were introduced large amounts of timber have been removed at unsustainable rates with large volumes taken as low grade timber for products such as pulp, wood chip and firewood. If the forests were managed sustainably we would have the supply crisis and biodiversity declines we are observing today.

the best way to ensure that there are timber products into the future is to stop the scale and intensity of native logging and convert the industry to softwood and hardwood plantations that are established on previously cleared land.

It will be important to providing incentives to establish plantations on cleared land.

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

It is essential that there is increased investment and incentivisation to establish softwood and hardwood plantations on previously cleared land to supply timber products and alternative jobs for timber industry workers currently engaged in native forest logging. The impact of PNF is

totally unknown but it likely to be the same as native logging on State Forest estate. From my experience working on private land that was previously subjected to PNF practices and associated grazing is that there is a significant loss of biodiversity values and considerable impact to threatened species and their habitats.

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

State Forests have been instrumental in the over extraction of timber and degrading the environmental values of their estate over the past decades. Promoting the conversion of old, mixed species forests to young, structurally simplified and young aged forests has degraded many forests biodiversity values and their suitability for a range of threatened species. State Forests lack of targeted weed control prior to and following logging operations is increasing the spread and density of weeds, particularly where lantana is present as it is favoured by the increased light when the canopy is opened from logging operations.
State Forests do manage lands for other purposes such as Flora Reserves, mountain bike trails, horse riding etc but these activities can be managed under different land management models such as National Parks, State Conservation areas etc where the surrounding forests are not logged.

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

Ending native logging (PNF & State Forest) will prevent standing trees that hold carbon, retain moisture and reduce erosion as well as maintain and enhance biodiversity values will help realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks. The establishment and expansion of softwood and hardwood plantations on previously cleared land will provide sustainable timber products whilst enabling native forests to provide much needed climate and biodiversity benefits in this time of climate change and biodiversity loss. It will be important to provide incentives to promote large scale hardwood plantations on cleared land and to provide native forest logging industry works alternative work opportunities.