

NAME REDACTED

Submission ID: 205225

---

**Organisation:** *Hayden Timbers Pty Ltd*

---

**Location:** *New South Wales*

---

**Supporting materials uploaded:** *Attached overleaf*

---

Submission date: 10/13/2024 9:56:10 PM

---

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

Recommendations:

1. Education and Promotional Campaign demonstrating the sustainable forestry practices in native forests.
2. Review of Coastal Integrated Forestry Operations Approvals: which is a statutory requirement, should commence immediately. If legislative amendments to the NSW Forestry Act 2012 are required to complete this review, those amendments should be identified and prioritized.
3. Include public consultation on a statutory review process of Integrated Forestry Operations Approval.
4. Expand the native footprint in the public estate.
5. No reduction of the harvesting areas unless approved under the Regional Forest Agreements. See Commentary for further detail.

---

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

Recommendations:

1. Raising the awareness of modern sustainable forestry practices is critical to the future of forestry operations.
2. Maintain a sustainable state native forest industry.
3. Objective and independent scientific evidence should not be set aside for reliance on anecdotal emotional opinion and ideology. See Commentary for further detail.

---

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

Recommendations:

1. Site visit to our green hardwood processing facility on the NSW Mid-North Coast to see the diverse range of wood products, processing and the variety of timber species.
2. Continue native forest harvesting in state forests with variety of timber species. See Commentary for further detail.

---

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

Recommendations:

1. Removal of dual consent requirements for private forestry to make it easier for landholders to engage in plantation and farm forestry.
2. Provide support to farmers to help them manage properties for timber harvesting on a sustainable basis.
3. Commit to a review of the NSW Plantations and Reafforestation Act 1999 and make recommendations to update the Act in line with modern requirements.

---

See Commentary for further detail.

**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**

---

Recommendations:

1. Retain sustainably managed public forests for all values.
2. Continue to support the native forestry industry in rural communities to promote productivity and support the regional economies.
3. All forests (including National Parks) to include fire mitigation practices and forest management practices to reduce fuel loads which is a continuation of past Aboriginal forestry techniques that promote and maintain biodiversity.
4. Recognition and balance of human needs and interests with the environment.
5. Encourage Indigenous employment opportunities in forestry and industry related activities.
6. Provide a balanced approach to environment conservation.
7. Provide suitable logs for woodchopping events.
8. Current federal government incentives for Made in Australia should include timber manufacturing processes.

See Commentary for further detail.

**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**

---

1. Expand carbon credits to native forests as per the Enhancing Native Forest Resilience method.
2. Recognition of the sequestration and carbon storage benefits of timber compared to other construction materials.

See Commentary for further detail.

# NSW Forestry Industry Action Plan

## Commentary

### 1) Sustainability of current and future forestry operations in NSW

#### Recommendations:

- 1. Education and Promotional Campaign demonstrating the sustainable forestry practices in native forests.**
- 2. Review of Coastal Integrated Forestry Operations Approvals: which is a statutory requirement, should commence immediately. If legislative amendments to the NSW Forestry Act 2012 are required to complete this review, those amendments should be identified and prioritized.**
- 3. Include public consultation on a statutory review process of Integrated Forestry Operations Approval.**
- 4. Expand the native footprint in the public estate.**
- 5. No reduction of the harvesting areas unless approved under the Regional Forest Agreements.**

The active management of NSW's forests is paramount for forest health and timber production and is sustainable over the long-term. In 2023, approximately 0.01% of NSW's 20 million hectares of the total native forest estate (not including private property) was harvested. Of the total estate, only 2 million hectares if available for harvesting and sustainably managed by NSW Forestry Corporation. Of these 2 million hectares more than half has been set aside for conservation under current regulations.<sup>1</sup> This comprised 11 709 hectares of NSW state's native forests and 1068.3 hectares of plantation hardwood forests.<sup>2 3</sup>

Trees removed during forestry operations are either replanted or regenerated following the harvest. This is reforestation not deforestation, as there is no permanent change to the landscape. The capacity to supply timber under the current regulations is sustainable but continuing to reduce the size of the harvestable forest estate is not. Since 1990, the area available for productive harvesting in the state forests has now diminished to less than a 1/3 of the previous size.<sup>4</sup> It is important to maintain a large footprint to sustainably harvest across the landscape to accommodate the lengthy regrowth periods without compromising forest health which would adversely impact its ecology. Industry needs a reliable access to a variety of timber species and drier sites suitable for prolonged periods when harvesting is not possible. The proposed removal of additional 175 000 hectares of state native forest to establish a Great Koala National Park will destroy the currently sustainable supply of hardwood timbers. In my opinion this offers no benefit to koalas as under current regulation, koalas are already protected as they are in any other forest area.

---

<sup>1</sup> Forest Corporation of NSW 2023. Sustainability Report

<https://www.forestrycorporation.com.au/about/pubs/corporate/sustainability-reports>. Accessed 10/10/24.

<sup>2</sup> Forestry Corporation of NSW 2023. Sustainability Report [Forestry Corporation - Forestry Corporation of NSW Annual Report 2022-23](#) Accessed 3/10/24.

<sup>3</sup> ABARES 2023. Australia's State of the Forests Report. Data tables and figures for Indicator 1.1a.i Forest area by forest type. <https://www.agriculture.gov.au/abares/forestsaustralia/sofr/criterion-1/indicator-1.1a.i-forest-area-by-type#forest-area-by-jurisdiction-and-category> Accessed 4/10/24.

<sup>4</sup> Davidson, J et al. DAFF 2006. A Summary of major changes in Australia's forests since 1992.

[https://www.agriculture.gov.au/sites/default/files/documents/ChangingfaceofAustraliasforests\\_20080404\\_v1.0.0.pdf](https://www.agriculture.gov.au/sites/default/files/documents/ChangingfaceofAustraliasforests_20080404_v1.0.0.pdf) Accessed 4/10/24.

The Regional Forest Agreements (RFAs) permits a small area of native forests for timber harvesting on a sustainable basis. Modern forest management systems are guided by scientific principles that are world renown. Single tree selection on native forestry practices has an initial limited impact upon harvesting but it is not permanent. The forest regrows and recovers. There is no permitted harvesting in old growth forests, these forests are set aside for conservation. Since 2009, the increase in native vegetation clearing on the north coast of NSW has corresponded with increased infrastructure, not timber forestry activities.<sup>5</sup>

Whilst a sustainable yield of hardwood timber is available in the state forests, it is not currently being supplied or offered to the hardwood processors. In 2022-2023, only 54.7% of the predicted sustainable volume available was harvested.<sup>6</sup> As a hardwood processor, our Wood Supply Agreement with Forest Corporation was approximately 50% of our log supply with private property and parcel sales supplementing the rest. For the past 5 years, we have not received our full allocation of wood supply. Approximately 70% of our log supply is now sourced from private property and other hardwood processors as available. It is a great challenge sourcing the volume and mix of native hardwoods to meet our orders.

In 1877, a government department was established to address the concern with forest protection balanced for all forest values. Initial land clearing for agricultural activities and the over harvesting of some species had a devastating impact on the native landscape and there was a need to protect native forests for future generations. The industry has remained for over 100 years because adaptive best practices have improved harvesting techniques and protected forests.

Many timber harvesters have worked in the same areas their father and grandfathers previously harvested before them. Our livelihoods depend on the ongoing sustainable operations carefully managed to have minimal long-term impact on the environment. The forestry industry has and continues to be important to the regional communities in terms of employment and economic benefits.

To maintain national sovereignty, it is important to sustainably utilise our own tree resources; retain the knowledge, skills and experience within our forestry industry to continue supplying sawn timber and wood products along with fire mitigation strategies. Wood imports are frequently sourced from Southeast Asia and Brazil with poor regulation that is contributing to deforestation.

The NSW hardwood timber industry is one of the largest employers and hardwood-producing industries in Australia. The Ernest and Young report 2023 indicated 8900 direct jobs on the North Coast. I understand there are approximately 22 000 jobs directly and indirectly reliant when you consider the whole supply chain to retail. There is \$2.9 billion in gross revenue from the hardwood timber industry with 63% from the Northeast NSW region.<sup>7</sup> The impact flows beyond the direct harvesting activities including transport, processing, servicing, construction, mining, manufacturing and wholesale trade, retail and administration and safety. Any reduction in our log allocation and volume has a significant impact on our business with repercussions for the wider regional economy. The current disruption of our log allocation has negatively impacted our hardwood processing business.

## **2) Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values**

---

<sup>5</sup> Statewide Landcover and Tree Study (SLATS) Dashboard. Cumulative woody clearing. <https://www.seed.nsw.gov.au/slats-dashboard> Accessed 7/10/24.

<sup>6</sup> Forest Corporation 2023. Sustainability Report 2022-2023. [Forestry Corporation - Sustainability reports](#) Accessed 10/10/24.

<sup>7</sup> Ernest and Young. 2023. Economic Contribution Study of the NSW hardwood timber industry. North East NSW Forestry Hub. <https://reefresearch.foundation/economic-contribution-study-of-the-nsw-hardwood-timber-industry/> Accessed 11/10/24.

## Recommendations:

- 1. Raising the awareness of modern sustainable forestry practices is critical to the future of forestry operations.**
- 2. Maintain a sustainable state native forest industry.**
- 3. Objective and independent scientific evidence should not be set aside for reliance on anecdotal emotional opinion and ideology.**

The Kunming-Montreal Global Biodiversity Framework enables responsible and sustainable socioeconomic development that, at the same time, contributes to the conservation and sustainable use of biodiversity. Sustainable forestry practices have little impact on the biodiversity over the long term yet provide valuable wood resources for our community. In 1992, Regional Forest Agreements were designed to resolve years of conflict and dispute over forest use and established a framework to balance environmental, social, cultural and commercial objectives for all forest uses for current and future generations. It is a world-class system that still achieves its objectives.

## Threat of Fire to Agriculture and Regional Communities

Over recent decades state forests with valuable productive multiple-use regrowth forests have been transferred over to National Parks and Reserves. There is now 5.6 million hectares of forests in NSW set aside for nature conservation only.<sup>8</sup> On the North Coast of NSW over 83% of the NSW public forest estate is permanently dedicated to conservation.<sup>9</sup> This sizeable area, is predominantly inaccessible, unmanaged and contains high fuel loads that threaten neighbouring plantation forests, farms and regional communities when accompanied by high intensity wildfires.

The catastrophic high-intensity wildfires of 2019-2020 is an experience no one in the regional communities would like to relive. Unplanned wildfires have a significant impact not only on local communities with loss of lives, shelter, infrastructure and farming but on forest health and its ecology.<sup>10</sup> Fire mitigation efforts cannot be mounted in remote areas with no road access, so forest fires become unmanageable with massive fuel loads given the right conditions. Aerial firefighting efforts are expensive, and if fire-retardant is used, seeps into the water table, potentially impacting water quality.

The native forestry industry has years of experience effectively managing fire across its landscape to reduce fuel loads that lower the damage from high intensity wildfires. Catastrophic wildfires pose one of the greatest risks to threatened species and plantation forests.

## Aboriginal Cultural Heritage Values

Aboriginal traditional owners have joint management agreements in about 30% of the National Parks estate. Forest Corporation of NSW partners with local Aboriginal communities to assist with traditional knowledge to deliver better outcomes for forests.<sup>11</sup> Aboriginals have continued to be involved in the timber industry with a government project actively promoting Indigenous participation in the forest and

---

<sup>8</sup> ABARES 2023. State of the Forests Reports. Forest area by tenure. Supporting information. [1.1a.ii Forest area by tenure \(2023\) - Supporting information - DAFF \(agriculture.gov.au\)](#) Accessed 4/10/24.

<sup>9</sup> Forest Corp Fieldtrip 2023 [Forestry Corporation Tour Presentation - REEF Research Foundation](#)

<sup>10</sup> National Parks and Wildlife NSW 2024. Ecological Health Performance Scorecard Report: Royal National Park, Heathcote National Park and Garawarra State Conservation Area.

<sup>11</sup> Forest Corporation of NSW. 2023 Annual Report 2022-2023. [Forestry Corporation of New South Wales Annual Report 2022-23](#) Accessed 7/10/24

wood products sector.<sup>12</sup> Our processing facility has long-term indigenous employees with intergenerational connection with the hardwood forest industry.

Before 1788, active land management was always a part of the Australian landscape. About 70% of Australia's plants need or tolerate fire but knowing when and how much was critical to managing the land. Indigenous cultural burning practices have only more recently begun to be fully appreciated with as a benefit to forest health and its ecology.<sup>13</sup> Prescribed burning was once routinely practiced in native forest harvesting and is still used within the NSW state forests as required.

Some First Nations people hunt and eat koalas using their skin and fur as a resource but for others are responsible for the protection of koalas and it is forbidden under their totem. These rules reflect a balance between protecting plants and animals whilst recognising human needs for resources. Good forestry practices offer the same principles when a balance between conservation and the responsible use of timber resources is maintained.

Aboriginal cultural sites are protected in the native forest estate.

### **Nature Conservation**

There has been a general pattern of decline in NSW species diversity with increased population, invasive species and permanent clearing regarded as the biggest threat to loss of species.<sup>14</sup> This has coincided with an increase in the size of the land set aside for conservation only. Yet silviculture practices including timber harvesting "can enhance forest health and productivity, water yield and biodiversity, as well as reduce the impact of wildfires and other risks to forests."<sup>15</sup> It is interesting to note that identifying areas of outstanding biodiversity value have typically targeted acquisition from state forests that have been managed to balance all forest values.

The NSW DPI ecologists suggest overall koala population has remained stable from 2015-2021 with no apparent decline in koala occupancy across the population despite extreme drought and devastating bushfires. It seems their numbers may have been underestimated considering the recent CSIRO that indicated that their numbers increased up to ten times the population compared to 12 years ago.<sup>16</sup> The greatest threat to many of the NSW koala populations along the coast is from increasing development, not forestry practices.

If the aim of the Great Koala National Park is to increase koala numbers by protecting koala habitat, why can't the National Parks with their woeful record on forestry management, manage koala conservation in the 83% of the north coast forests already set aside for conservation. It is difficult to understand why adding any state forest to that land improve koala conservation when evidence suggests forestry has no impact on koala numbers.

### **Other Forest Activities**

---

<sup>12</sup> DAFF 2005. The National Indigenous Forestry Strategy. [https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/forestry/australias-forest-policies/nifs\\_strategy.pdf#:~:text=The%20National%20Indigenous%20Forestry%20Strategy%20is%20built%20around%20the%20vision](https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/forestry/australias-forest-policies/nifs_strategy.pdf#:~:text=The%20National%20Indigenous%20Forestry%20Strategy%20is%20built%20around%20the%20vision) Accessed 6/10/24.

<sup>13</sup> Gammage, B. 2011. The Biggest Estate on Earth: How Aborigines Made Australia. Allen and Unwin, Crows Nest.

<sup>14</sup> EPA. 2024. NSW State of the Environment: Biodiversity Outlook Report. <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Animals-and-plants/Biodiversity/Biodiversity-Indicator-Program/nsw-biodiversity-outlook-report-2024-240126.pdf> Accessed 7/10/24.

<sup>15</sup> Forestry Australia. 2024. Silviculture in Australia's Native Forests IFA Forestry Policy Statement 2.9. Accessed 7/10/24.

<sup>16</sup> CSIRO 2024. [https://nkmp.org.au/docs/NKMP\\_2024estimates\\_report\\_150424.pdf](https://nkmp.org.au/docs/NKMP_2024estimates_report_150424.pdf) Accessed 10/10/24.

- 1) **Tourism:** If nature-based tourism is so popular, why doesn't National Parks with their 7 million hectares already operate profitable businesses? Humans aren't necessarily able to access National Parks like State Forests.
  - 2) **Recreation:** Camping sites are restricted in National Parks; fires are only allowed in designated areas and moving around the park becomes a foot-only access. Some National Parks are unable to be crossed with thick undergrowth restricting any access.
  - 3) **Forestry:** Timber harvesting and processing is one of the oldest industries in NSW. The North Coast of NSW is the birthplace of the NSW's hardwood timber industry which has remained the backbone of many regional communities. By providing important wood resources, the area has served the state and country with timbers for infrastructure, homes, furniture, power supply and war efforts. Whilst the initial impact is unavoidable with selective logging, the long-term offers protection of biodiversity values, including threatened species and habitats. It also provides road access for bushfire/emergencies and green spaces where we can enjoy a wide variety of recreational activities that are restricted in National Parks.
- 3) Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail**

#### **Recommendations:**

- ***Site visit to our green hardwood processing facility on the NSW Mid-North Coast to see the diverse range of wood products, processing and the variety of timber species.***
- ***Continue native forest harvesting in state forests with variety of timber species.***

The timber industry is one of the oldest industries in the world. Wood has remained popular because it is simply processed, energy efficient compared to intensive industrial alternatives and suitable for multiple purposes and applications. Wood continues to remain in high demand as the preferred and only completely renewable and sustainable construction material.

The market relies on our green-sawn hardwood timber products and demand for our wood products has always surpassed our capacity to supply. We are limited by log supply and the volume that can be processed within the sawmill. The bulk of our timber is sold within NSW, and other states unable to supply their own timber. A small percentage is exported.

As a hardwood processor, we need access to adequate provisions of a variety of timber species from both native and plantation forests to continue supplying our various sawn timbers and wood products. As hardwood timbers are slow growing, they are more durable with high density fibres that offer strength with flexibility, durability, low maintenance, fire resistance for a long-lasting investment in the harsh outdoor environments. Tree species are graded to determine strength, durability and hazard levels required for a particular use. Due to the growth period to maturity (30-50 years) and the growing demand for hardwood products it is important to maintain a large estate (in excess of the current 2 million hectares available) to cater for future growth. We cannot rely on overseas timbers for wood products.

We uphold the responsible management of our log resource and have focused our efforts in maximising the recovery rate for each log. Logs vary in quality and are matched for product requirements. What is not suitable for larger sawn pieces of timber is used for smaller pieces of sawn timber before other wood products such as firewood, woodchip and biomass. All parts of the log are used with a few straps for the packaging for our wood products. Whilst it is labour intensive, log wastage is minimal.

Outside the industry, the wider community remains largely ignorant of the benefit of sustainable native forests – wood as a natural resource. Expensive composite materials are industrial intensive processed products with increased waste, and no proven performance in the market over long-term 30-50+ when compared to sawn wood.

### **Mining Timbers**

NSW currently relies upon fossil fuels as a reliable energy source and metallurgical coal is required for steel and cement construction. In this context, it is therefore of paramount importance to appreciate the role of mining timber as it contributes to the state's energy supply and its involvement in production of non-renewable construction materials. Many downstream sectors rely heavily upon steel and cement as a construction material and most businesses need a constant source of reliable power.

Mining timbers are critical for structural support in underground mining. Almost half of the timber wood products we supply to the market are used in mining. Wood provides strength, durability, elasticity, and has been used for centuries in underground mining because it is readily available, renewable, cost effective, easy to transport and assemble, and provides a proven level of safety to mine workers.

To continue providing mining timbers, it is imperative we have reliable and continued access to the native forests that provide the variety of species utilised in mining timbers. Mining timbers are processed from salvage grade sawlog which meets the specific need for an essential product. Hardwood plantation timbers are generally not used in mining timbers. Salvage sawlogs are harvested from the forest to improve log stock and provide access to the higher quality sawlogs used in other products.

Any change in timber costs or use of more expensive alternatives contributes to the increased cost of coal-based electricity, freight, construction and agriculture. Replacement products for timber eg: steel, concrete, plastic contributes to increased carbon emissions whereas it is well known that timber sequesters and stores carbon.

### **Railway Timbers including Sleepers and Transoms**

Whilst concrete is predominately used in railway construction, railway timbers are still heavily used within the network. They are efficient and effective in terms of reliability and performance for railway infrastructure. Furthermore, timber has a known and reliable history of product safety which is paramount for public safety.

Railway timbers require a specific high-grade quality sawlog that can only be processed from specific native hardwood forests. It is not possible to use plantation hardwood or softwood sawlogs as the fibres aren't dense enough to maintain the structural integrity and meet the required heavy structural standards.<sup>17</sup> Each piece of railway timber is independently inspected for quality control before leaving our sales yard.

Wooden sleepers are comparatively cheap, light and easy to transport, install and maintain with little to no specialist equipment or vehicles for maintenance. Railways timbers don't have high costs of carbon emission during manufacturing and are easily repurposed once their lifespan has been reached. There is

---

<sup>17</sup> AS 1720.1 – “Timber structures – Design methods”.

- AS 2082 – “Timber Hardwood - Visually Stress - graded for structural purposes”.
- AS 2878 – “Timber classification into strength groups”.
- AS 3818.1 – “Timber – Heavy structural products – Visually graded, Part 1: General requirements”.
- AS 3818.2 - “Timber – Heavy structural products – Visually graded, Part 2: Railway track timbers”



a strong second-hand market for reclaimed timber sleepers for gardening, landscaping or to use as biomass fuel.

Bridge transoms are primary load carrying elements of a railway bridge structure and hardwood timbers are still used extensively. It is understood composite materials are progressing, but they are 5-10 more expensive than timber railway timbers and demonstration of their effectiveness is uncertain.

Turnout timbers are still supplied to the market as bearers commonly used in railway switches and crossings.

### **Agricultural/Fencing Timbers**

Timber fencing remains a popular choice for many homeowners and still largely used in agriculture and rural properties. It is long-lasting, readily available, fully renewable, easily transported and constructed. Timber fencing is visually appealing in rural properties and more cost-effective for large areas. There are requirements in some rural areas to use timber fencing and some local councils specifically require timber fencing for wildlife to climb over and prevent animals from getting trapped or injured eg: koalas. As untreated hardwood timbers are non-toxic and biodegradable, they are also used in oyster farming and bee keeping.

### **Home and Industrial Construction Timbers**

Hardwood timbers are used extensively in flooring, decking, balustrades, stairs, ramps, pergolas and verandahs especially in outdoor weather as they are long lasting. They are also used as features in timber benches, desks, tables and exposed beams.

Building a house in a bushfire-prone area requires careful selection of materials to ensure maximum fire resistance. Building regulations require timbers used in construction to be sourced from fire-resistant hardwood species.

Hardwood timbers are often used in larger industrial and civic constructions eg: Barrangaroo, Opera House, Darling Harbour, National Park boardwalks, retaining walls, indoor sports stadium flooring, scaffolding footings, wharves, platforms, seating, tables and other structural features. Hardwood timbers are more durable outdoors with a greater life-expectancy than some alternatives, especially if they are above the ground.

Specific native timber species are sometimes required for heritage assets.

### **Pallet Timbers**

The humble pallet deserves a special mention as it plays a crucial role in transporting and handling goods. Pallets come in standard dimensions to help streamline the unloading and loading of cargo from warehouses and truck houses. Pallets are efficient, cost effective and safely move goods around the country. This includes food produce. Pallets can be used from softwoods, but heavy-duty products require hardwood timbers.

In recent years, the lack of product availability due to supply-line challenges, was partly related to difficulties in sourcing timbers for pallets during an extended wet-weather period and closure of native forests in other states.

Pallets that are not recycled or repurposed are sometimes used as firewood in low socio-economic demographics where alternative heating is unaffordable.

### **Firewood**

Everybody loves a cosy fire in winter. With increased costs of electricity, many use firewood for heating, and some are still using fuel stoves. Offcuts from our sawn timber are set aside for firewood sold in bulk commercial sales and to the local rural community. The demand for firewood has accelerated in recent years following the closure of native forests in other states and increased electricity prices.

### **Saw Dust/Woodchip**

All stages of processing produce saw dust which is extracted and used as animal bedding, landscaping as compost and potting mix. Once a piece of timber reaches a processing stage where it can no longer be used for any sawn product, it is further processed into woodchip used in landscape supplies and powerplants.

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

##### **Recommendations:**

- 1. Removal of dual consent requirements for private forestry to make it easier for landholders to engage in plantation and farm forestry.***
- 2. Provide support to farmers to help them manage properties for timber harvesting on a sustainable basis.***
- 3. Commit to a review of the NSW Plantations and Reafforestation Act 1999 and make recommendations to update the Act in line with modern requirements.***

The current footprint of the NSW state hardwood forest estate has been supplemented with hardwood plantation and private native forests for many years and is not enough to supply the market. An increase in hardwood imports often originating from other forests eg: South-East Asia and Brazil with poor regulation and contribute to harmful deforestation practices. We are now a net importer of wood product which is increasing by approximately 20% per annum. There is over \$5 billion of imported timber because we can't meet our own domestic demand due to the reduced footprint of the native state forests.

In the Northeast NSW, approximately 70% of the timber is sourced from the public native state forests including a small proportion of the state hardwood plantation forests with the remainder from private property. As a hardwood mill processor on the NSW north coast, we need a constant, reliable and secure supply of hardwood logs to continue. As large capital investments are required, we need certainty of supply for operations and maintenance equipment, industry knowledge and infrastructure to continue.

Any proposal to abandon and reduce the harvesting in current productive state forests with established multi-aged forests for timber resources will have a significant impact on our future processing. It is likely our hardwood processing facility will not be viable with the limited supply of suitable sawlogs from hardwood plantation and private native forests.

### **Hardwood Plantation Forests**

Whilst we use hardwood plantation timber, they do not produce the variety, quality and quantity for some of our wood products. Each timber has different properties associated with strength fibres and durability which is a consideration in selecting a species to meet structural requirements some products.

Hardwood plantation forests are useful in supplementing the supply harvested from native forests, but they are only single species as some species fail when grown in plantations. There is a lengthy wait

approximately 30-50 years of growth before they can be harvested for suitable sawlogs for a capital return. In that time, they are susceptible to fire; disease and the end-product may not be suitable for sawlog use. They are clear-felled for timber and replanted. We understand there is only 55 000 hectares of hardwood plantation forests in NSW and there is 2 million hectares of native hardwood forests managed by Forest Corporation. Therefore, there is a clear discrepancy between our needs that cannot be met with hardwood plantations.

Hardwood plantations do not promote biodiversity as the only concern is for timber production. Suitable available land competes with prime agricultural land and conflicts with neighbouring landholders and local communities. The Kangaroo Island experience demonstrates the complications associated with plantation forests. It impacted the wildlife as koalas overpopulated the area with new plantation growth, but starvation followed once the timber plantation is clear-felled created abrupt habitat loss. The forests also fuelled wildfires that devastated neighbouring agricultural and recreational activities, with the plantations hugely unpopular and divided the local community.

Hardwood plantations are expensive to plant and maintain. There are no guarantees of a log supply in 30-50 years as anti-forestry campaigners apply pressure to prevent harvesting with concerns on the devastating effective on the environment.

### **Private Native Forests**

Although the 7.708 million hectares<sup>18</sup> of private forest estate in NSW seems like an alternative to the public native forest, as processors we are concerned about the limited availability and sustainability of accessing these forests for timber production. The state forests have been managed to provide hardwood timber resources in their existing multi-aged forests over the long-term. Most private native forests have not been grown with timber production as the primary purpose and farmers are largely unaware and reluctant to manage their forests.

In recent years, our log volume from the NSW state forest estate has been reduced by at least 20-30% with private property timber purchases now approximately 70% of our log supply. Unfortunately, other sawmills compete for the limited supply of private property timber which has inflated the cost to consumers. We still struggle to source relevant species to fill orders and negotiate with other hardwood processors if they have suitable logs available.

As we have sourced timber from private native forests for nearly 20 years to supplement our wood supply agreement we have encountered the following difficulties:

- Cooperation and consent of the private landowners – there are no guarantees of supply.
- Poor infrastructure to access sites – inflates costs of logs.
- Approvals difficult with dual consent required by Local Land Services and Councils in some regions which prevent and delay harvesting operations.
- Competing with other land uses eg: tension between agricultural and forestry sectors.
- Forests that often have not been sustainably managed for timber production and either have no suitable sawlogs.
- The landowner has additional responsibilities of managing regeneration.

The proposed plan to exit native forestry and use private native and plantation forests does not consider the current yields which cannot be met by reducing the public native forest.

---

<sup>18</sup> ABARES, 2023. Australia's State of the Forests Report Indicator 1.1a ii Forest area by Tenure. [1.1a.ii Forest area by tenure \(2023\) - Supporting information - DAFF \(agriculture.gov.au\)](#) Accessed 8/10/24.

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**

**Recommendations:**

- 1. Retain sustainably managed public forests for all values.**
- 2. Continue to support the native forestry industry in rural communities to promote productivity and support the regional economies.**
- 3. All forests (including National Parks) to include fire mitigation practices and forest management practices to reduce fuel loads which is a continuation of past Aboriginal forestry techniques that promote and maintain biodiversity.**
- 4. Recognition and balance of human needs and interests with the environment.**
- 5. Encourage Indigenous employment opportunities in forestry and industry related activities.**
- 6. Provide a balanced approach to environment conservation.**
- 7. Provide suitable logs for woodchopping events.**
- 8. Current federal government incentives for Made in Australia should include timber manufacturing processes.**

Good integrated forestry management offers protection of biodiversity values, including threatened species and habitats in the long-term. In addition, it provides other benefits which include recreational activities, road infrastructure, fire control, ecotourism, and production of non-timber products like honey.

The Regional Forest Agreements (RFAs) have demonstrated a strong and effective framework for the sustainable management of our forests in NSW. The balance has already been determined for all forest values and gave us the certainty as a hardwood processor to invest in expensive equipment to grow our business operations.

In 2022-23 Forest Corporation of NSW as a land manager cost the taxpayer about \$7.50 per hectare to manage its 2-million-hectare estate. This was despite a \$15 million loss due to wet weather. The revenue generated from timber processors subsidises bushfire mitigation and emergency fire services, road access, recreational activities without huge expense to the budget.<sup>19</sup> As a comparison, National Park management costs per hectare have been estimated at \$230 and \$300 per hectare each year. If the proposed 175 000 hectares is transferred to the Great Koala Park, it will cost an additional \$457 per hectare to the taxpayer.<sup>20</sup>

State forests are important free public spaces for outdoor activities, particularly for families, community groups, schools and those on low incomes. There is no entry fee expenses for bushwalking, rock-climbing, hiking, camping, horse-riding, bike-riding etc. and more accessible when compared to National Parks for expeditions.

Our hardwood processing facility relies on the hardwood timber from the state forests. The viability of our business will be threatened with a reduction in our supply from the native state forests. We can only process hardwood timbers. While it may seem obvious, our processing facility cannot be converted into a softwood processing facility as we are not located near any softwood plantation forests and our

---

<sup>19</sup> Forest Corp 2022-2023. Annual Report.

[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) Accessed 9/10/24.

<sup>20</sup> Coghlan, B. 2024. Letter to the Editor: Are We Getting Good Value for our National Parks?

<https://www.newsofthearea.com.au/letter-to-the-editor-are-we-getting-good-value-for-our-national-parks> Accessed 9/10/24.

equipment is not suitable or designed to process softwood timbers. Costs to convert equipment would be prohibitive.

Furthermore, any reduction in our log allocation and volume has a significant impact on our business with repercussions for the wider regional economy. Most of our turnover, is directly spent within our NSW coastal communities, injecting a substantial sum into the regional economy.

Many agricultural shows still draw large crowds to watch the woodchopping events. These popular exhibitions and competitions rely on the availability of suitable hardwood logs and a demonstration of early forestry practices.

**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.**

Sustainable forestry practices are a benefit to supporting carbon and biodiversity markets. Once harvested, wood products continue to store carbon during the lifespan of the product. Most wood products are repurposed, recycled and reused after their initial use, waste is minimised. After harvesting, replanted plantations and regenerated native forests provide more carbon storage because growing trees act as a sink to absorb carbon dioxide.

NSW forests lost an estimated total 165 million tonnes of carbon (tC) between 1990 and 2021 with most of this loss due to the 2019-2020 wildfires. Compared to fire and private property clearing between 1990 and 2007, movements of carbon associated with timber harvesting are relatively low.<sup>21</sup>

“In the long term, a sustainable forest-management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.” IPCC 2007: Pg 69<sup>22</sup>

**Recommendations:**

- 1. Expand carbon credits to native forests as per the Enhancing Native Forest Resilience method.<sup>23</sup>**
- 2. Recognition of the sequestration and carbon storage benefits of timber compared to other construction materials.**

---

<sup>21</sup> Mullion Group 2023. Carbon Balance of NSW Forests Research Note October 2023.  
<file:///C:/Users/Katrina/OneDrive/Documents/Forestry/Research%20note%20-%20Carbon%20balance%20of%20forests%20-%20October%202023.pdf> Accessed 9/10/24.

<sup>22</sup> AR4 Climate Change 2007: Mitigation of Climate Change [AR4 wg3 \(ipcc.ch\)](https://www.ipcc.ch/)

<sup>23</sup> Freeman, M. 2024. Forestry Australia Proposal: Expanding carbon credits to native forests. Media Release Tuesday 30th July 2024.