

Public submission

KERRY WALKER

Submission ID: 204822

Organisation: *Hunter Wildlife Rescue*

Location: *New South Wales*

Supporting materials uploaded: *Attached overleaf*

Submission date: 10/13/2024 1:09:56 PM

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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

1. Sustainability of current and future forestry operations in NSW

- Native forest logging is unsustainable from both an environmental and an economic perspective. It is an extractive industry that has operated for 200 years in Australia, escalating in the past few decades. Protections for mature trees were removed in 2018 and logging was intensified. 60% of the forests and woodlands that once existed in NSW have been destroyed or degraded in that time.¹

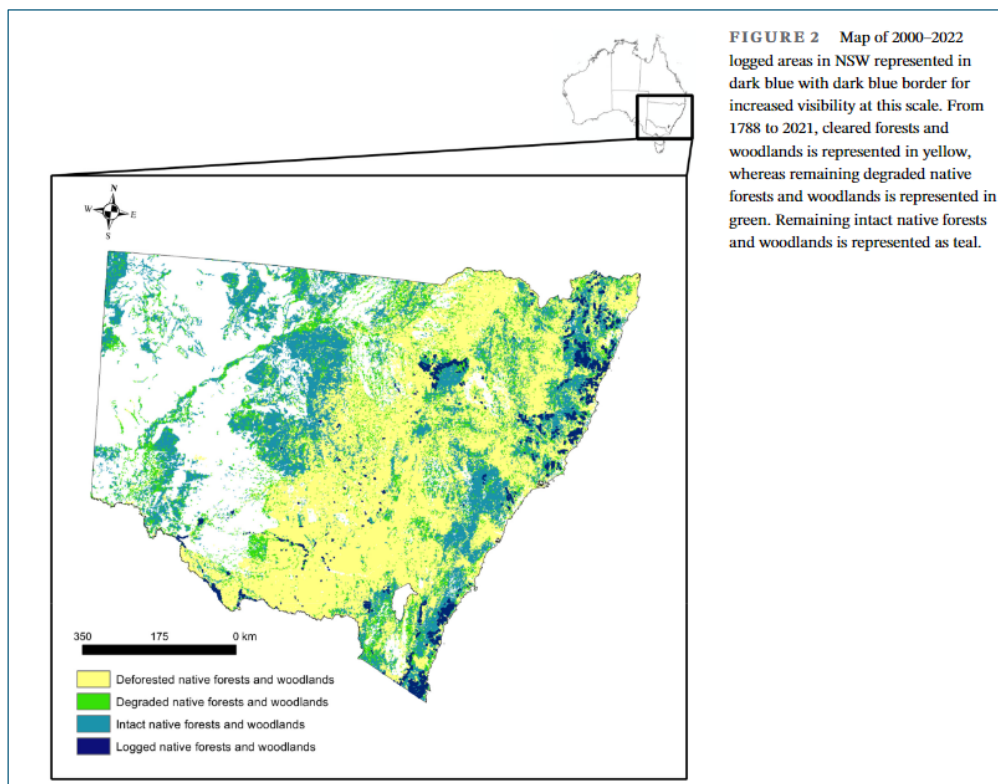


Figure 1: Excerpt from Reference 1 showing degradation of forests in NSW since 1788 to 2022.

- From an environmental perspective, planting any replacement trees for logged trees that are 200+ years old is self-evidently of minimal use to current wildlife. They provide insufficient food, shelter and nesting capacity for existing populations until they have matured, well beyond the lifespan of generations of native animals. Replanting also does not account for the territorial nature of most species that will not naturally relocate to areas of replacement growth. This renders seemingly viable populations of native wildlife as “functionally extinct”.
- Any such replacement planting has to date been conducted as a monoculture with little allowance to replicate the biodiversity of species of the original forest.

¹ “Shifting baselines clarify the impact of contemporary logging on forest-dependent threatened species”, Journal of Conservation Science and Practice, Ward et al, published August 2024.

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- From an economic perspective, continuous government subsidy of an industry utilising public money is not good economic practise and would not be continued indefinitely by any organisation working under common practise financial standards with accountability to owners/shareholders for acceptable returns on their investments.
- The yield from public native forests has declined by 40% since 2010.

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

- Healthy and unlogged forests are critical to the whole environment and both First Nations and non-First Nations culture and identity.
- Forests, particularly healthy mature forests, generate rainfall, cool the landscape and clean the air.
- Native forest logging reduces the function and health of waterways, including streams and rivers. They play the critical role in water security by providing soil stability that maintains manageable stream flows on rainfall, holds moisture and minimises soil runoff and land gouging. Existing and recovering forests are the pathway to water security.
- Removal of such trees and the resulting changes in water runoff create desertification of the land and removal of moisture. Contrary to popular and unsubstantiated claims, this increases the risks of fire, which in turn pollutes waterways from subsequent rainfall picking up contaminants.
- Native forest logging increases the penetration of weeds and other invasive species.
- 150 threatened species in NSW are directly impacted by logging native forests. Thirteen of these species are listed as **critically endangered**. This means there is a 20% probability of extinction in ten years (or five generations, whichever is longer) without urgent conservation action.
- 174 species in NSW rely on hollows for dens and nests; removing mature trees takes away valuable food sources and hollow bearing trees that can only be created in aged trees. One of these species, the Greater Glider, has recently been named as The Project's 2024 "Marsupial of the Year".
- Mature and unlogged native forests are critical for pollinators and play a key role in pollination across the landscape, both inside and outside of forests.
- Logged areas impact connectivity. It is now well established that trees in forests are connected by an intricate web of mycelium beneath the soil and sustain each other in various ways. Loss of a section of trees creates stress on the entire population of trees remaining.
- Native forests provide recreation and improved health outcomes to locals and visitors alike and are a source of community pride and connection to place. Modern mental health programs stress the importance of spending time in nature as an antidote to screen and technology exposure.
- Native forests in NSW hold significant cultural and spiritual totemic value for First Nations people.
- First Nations people and communities have ongoing connection to native forests and forest landscapes are an integral part of cultural practice and knowledge.

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- Connectivity of country is important for cultural connection.

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

- In 2023, logging in native forests accounted for only 9% of the total log production in Australia (2.4 million of the total 25 million cubic metres for that year). It is therefore a minor contributor to production.
- Half of the logs taken from native forests in 2023 were turned into woodchip and exported. These are not high value market products.
- Hardwood logs taken from plantations made up 8.5 million cubic metres, and just 8% of these logs were saw and veneer logs. 87% of hardwood plantation logs were exported as wood chips.
- Hardwood sourced from native forests or plantations are no longer necessary for any of the uses identified in this section.
- Alternative reused and recycled materials are increasing all the time with the growing focus on the Circular Economy model.
- Sawn and treated softwood logs and composite timber products made from softwoods can substitute for all current uses for native forest and plantation hardwoods.
- The market and demand for native forests is declining rapidly, for example, Essential Energy moving away from power poles harvested from native forests and using alternative materials.

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

- Plantations provide 91% of Australia's log production. Native forests provide marginal increase in capacity compared with their value left intact.
- A higher proportion of harvested logs from plantations (dedicated farmed forestry) should be prioritised as saw and veneer logs, rather than exporting them as wood chips.
- Subsidising the logging of public native forests by the Forestry Corporation is non-competitive and distorts the market away from the more profitable softwood plantation industry.
- High-end and luxury native hardwood products should only be selectively harvested on private land and under strict conditions including production volume limits.

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

- Native forests that are not logged have real and tangible benefits to the entire ecology and economy of NSW.
- Many countries have recognised the enormous impact of intact forests on biodiversity and climate change and rely entirely on plantations for wood production. New Zealand, for example, banned native forest logging two decades ago, in 2002.

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- In Australia, South Australia has protected native forests since the 1870s. The ACT banned logging in the 1980s. As of 2024, Western Australia and Victoria have ended their native forest logging operations (except logging for fire breaks, salvage logging after windstorms, and logging on private land). NSW should operate to current modern standards.
- The Eastern forests of Australia are a recognised global biodiversity hotspot and the NSW Government through State Forests has a role to address this as a priority.
- In particular, maintaining connectivity between the remnant sections of forest is critical for many species. Current evidence shows minimal connectivity left within logged areas (Figure 2 and 3)², as well as some areas of no connectivity between State Forests and other designated areas e.g. National Parks, State Conservation Areas (part NSW Taree and environs, Figure 4³). This limits population movements of native animals and therefore genetic diversity and makes specific areas vulnerable to individual local natural disasters.

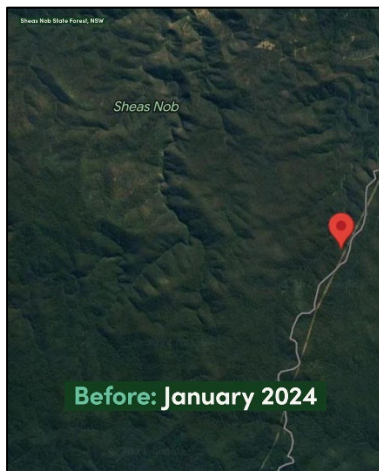


Figure 2 Sheas Nob forest Jan 2024



Figure 3 Sheas Nob Forest Sept 2024 post Logging show little connectivity.

² Source Bob Brown Foundation, October 2024, Facebook.

³ Source: Photograph taken at Taree Service Centre by submission author 8 October 2024.

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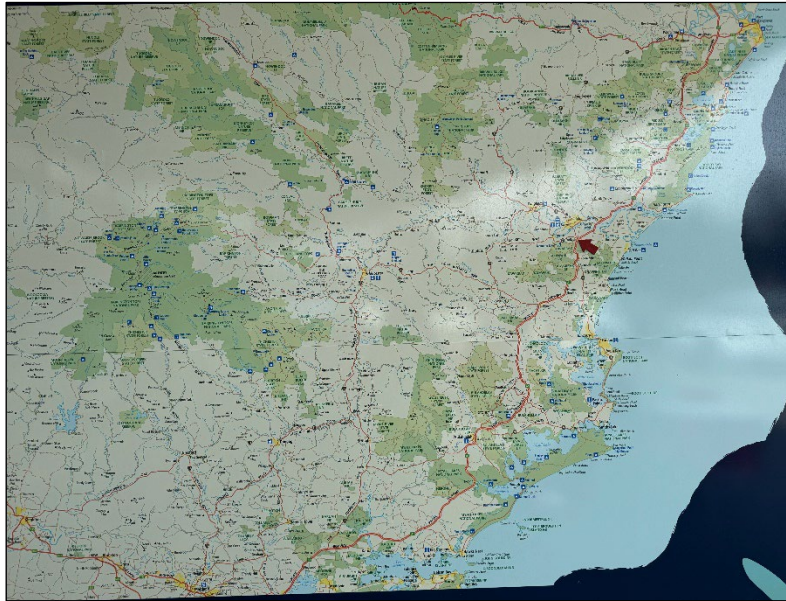


Figure 4: Area map Taree Service Centre showing fragmentation of forested areas of various designations (State Forests and otherwise) across the local area and lack of connectivity.

- Native state forests cover an area of 2 million hectares in NSW and impact on a diverse set of living conditions for many towns, from water quality in reservoirs, to greater tourism industry opportunities, and carbon storage and abatement.
- The native forest hardwood division of the Forestry Corporation operates at a loss that runs into tens of millions of dollars, at the expense of the NSW public. It also additionally receives tens of millions of dollars in regular equity injections. This money could be directed towards supporting alternative industries and providing a just transition for timber industry workers.
- The people of NSW should not be paying millions of dollars to destroy the biodiversity of our own state and critical habitat for threatened species.
- Public native forests have a much higher economic value when they are allowed to function naturally and without logging.
- First Nations Ranger Programs have been hugely successful at managing the recovery and health of native forests. Programs like the Githabul Rangers have shown how First Nations knowledge and management can restore the natural and critical function of forests in the landscape.

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

- Native forest logging in NSW is estimated to release 3.6 million tonnes of carbon every year. It reduces biomass and carbon storage.
- Ending native forest logging would be the equivalent to removing more than 800 thousand cars from the roads per year.

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- Ending native forest logging will allow previously logged forests to regain lost carbon and make a significant contribution to meeting our emissions targets.
- Climate change is driving increased risks for forest health and continued logging in native forests is exacerbating that risk.
- Forests that have not been logged are more resilient to the changing climate and catastrophic fires that are occurring as a consequence.
- Modelling conducted by the Hunter Community Environment Centre⁴ shows how species will retreat to higher, forested areas as the climate warms, rendering remaining forests even more critical.

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@ipcn.nsw.gov.au for assistance.

⁴“Barrington to Hawkesbury Climate Corridors: Connecting regional climate change refugia for native species’ persistence in a warming world”, Hunter Community Environment Centre, December 2022