

# Public submission

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**Organisation:** *IFAW (International Fund for Animal Welfare)*

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**Location:** *New South Wales*

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

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**Re: Submission to the Independent Forestry Panel NSW**

The International Fund for Animal Welfare (IFAW) is a global non-profit helping animals and people thrive together. Working in more than 40 countries around the world we rescue, rehabilitate, and release animals, and restore and protect their natural habitats.

The problems we're up against are urgent and complicated. To solve them, we match fresh thinking with bold action. We partner with local communities, governments, non-governmental organizations, and businesses. Together, we pioneer new and innovative ways to help all species flourish.

IFAW has almost 100,000 supporters in NSW and over 8.5 million supporters globally.

We welcome this much-needed and long-overdue review of native forestry operations in NSW and the opportunity to provide input.

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

The forests of New South Wales are globally significant. They are the most biodiverse and evolutionarily distinct ecosystems on the continent. These forests are truly ancient refuges tens of millions of years old, encompassing two World Heritage Listed areas, the Greater Blue Mountains World Heritage Area and the Gondwana Rainforests in northern NSW.

They are home to iconic, endemic and threatened species such as koalas, greater gliders, yellow belly gliders and glossy black cockatoos.

Yet, the east coast of Australia is also a deforestation hotspot, with around 14,000 hectares of native forest are logged each year.

An estimated 174 species in the state rely on hollows for dens and nests. However, through the intensity of the forestry operations, including the targeting of old growth trees, these hollows and the trees these animals call home have been decimated.

Unbelievably, the protections for mature trees were removed in 2018 and logging was intensified to try and get more wood from native forests

The structure of the forests is now so compromised, they no longer provide safe refuge and corridors and species have nowhere to live and nowhere to go.

The intricate matrix of these once intact forests has been so dramatically altered, they are unrecognisable. These intensive logging operations are incredulously taking place in the declared Great Koala National Park.

It is driving local extinctions of animals including the koala, greater glider, yellow bellied glider and the glossy black cockatoo with no chance of recovery.

Ultimately, this style of logging is akin to mining and there is no way for it to be ecologically sustainable. The logging that is currently occurring in NSW can justifiably be described as extinction logging.

Not only is the unique biodiversity so drastically impacted by the systematic industrial-style logging, there are many other adverse effects, including:

- Reducing of biomass and carbon storage. The removal of mature trees depletes valuable food sources and hollow bearing trees
- Compromising the function and health of waterways, including streams and rivers through erosion and water way pollution
- Exacerbating fire threat and intensity
- Forests that are repeatedly logged are more flammable, making a significant contribution to heightened fire risk (Lindenmayer and Zylstra 2024).
- An analysis across the fire footprint of the Black Summer fires showed that logged
- forests always burn at higher severity than intact forests (Lindenmayer et al. 2022b).

Following the tragedy of the 2019/2020 bushfires, what our forests needed most was to be left to recover and become functional again. This has not happened.

In 2021 the Natural Resources Commission authored a report concluding that forestry rules were not fit for a post-bushfire context and called for the suspension or restriction of logging in extreme and high-risk areas to protect environmental values. However, the government did not implement the findings and attempted to keep it secret (<https://www.theguardian.com/australia-news/2021/nov/25/secret-document-urges-native-logging-halt-in-nsw-regions-hit-hard-by-black-summer-bushfires>)

### **Economically unsustainable**

The industry can only continue to operate via major government subsidies from government. E.g. it was estimated that in 2019-2020, Forestry Corp of NSW received \$249 million in subsidies and grants and still made a loss of \$28m (Frontier Economics 2023). The yield from public native forests declined by 40% since 2010.

Native forest logging is unsustainable, uneconomical and unjustifiable, particularly when it is not necessary and there is an alternative solution in sustainably managed plantation logging.

It is time to listen to the science and the economics and end native forest logging.

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

### **Environmental values**

Healthy, intact forests that are not logged are absolutely crucial to a healthy environment and functioning ecosystem. There are 269 nationally listed threatened species in NSW and the landscape scale significance of native forests means that native forest logging compromises many ecosystems and habitats throughout NSW.

It is estimated that 150 threatened species in NSW are directly impacted by logging native forests. Forests are also crucial for pollinators, playing a key role in pollination across the landscape.

Healthy mature forests are key to generating rainfall which both cools the landscape and purifies the air that we all breath.

### **Cultural values**

Native forests hold significant cultural and spiritual value for First Nations people, who have an ancient and ongoing living cultural connection to them. They contain many sacred cultural sites including scar trees. Forest landscapes are an integral part of Dreamtime stories and ancient Songlines, along with the native animals that inhabit them. For instance, koalas are important totems of many Aboriginal groups in New South Wales, including Gumbaynggirr of the Mid North Coast, Birpai of Port Macquarie, and Awabakal of the Hunter region. Each clan is responsible for the stewardship of their totem, ensuring responsible management of resources

First Nations people have an inherited and inherent responsibility to look after the Country they have been on for thousands of years.

Native forests could also hold the key to First Nations groups being able to benefit economically from protecting and recovering forests.

Returning the forests to rightful indigenous ownership and management should form part of the transition away from native forest logging.

In addition, nature-based eco-tourism is a booming industry. Locals and visitors alike want to be able to walk in intact ancient forests and witness the beauty of old growth trees and the plethora of wildlife that live in them. Forests provide important recreation areas for hiking, camping and fishing and are also important for our mental and physical well-being.

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

The market and demand for wood from native forests is declining rapidly, one recent example being of Essential Energy moving away from power poles harvested from native forests.

In 2023, logging in native forests accounted for only 9% of the total log production in Australia and only contributed 2.4 million of the total 25 million cubic metres. In that year, half of the logs taken from native forests were turned into woodchip and exported.

There is no longer any need to log public native forests to build houses. Plantations can fully supply our high quality and composite timber products.

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

Hardwood and softwood plantations already provide 91% of Australia's log production. Shifting to higher-value plantations can better meet timber needs.

The future of the forest and timber industries in NSW is in plantations. The plantation industry is far more profitable and employs far more people. It also generates fewer greenhouse gas emissions.

It is also significantly less prone to fire, which is a huge consideration with climate-fueled bushfires of increased frequency and intensity becoming the norm.

Plantations also produce a higher yield than native forests and are overall far more environmentally and ecologically sustainable.

Ending public forest subsidies would also boost sustainable timber production on private lands.

However, plantation logging is not without its challenges and, as with any large-scale shift in methodology, the transition needs to be mindful and carefully managed, including for reducing fire risks.

Importantly, a shift to plantations should categorically not involve conversion of even limited areas of native forest to plantations. Investment in hardwood plantation on already cleared land would supply timber products into the future.

IFAW would like to urge an element of caution and learning from other states who have already make the transition. For example, in south west Victoria, contrary to preliminary research indicating that koalas would not inhabit blue gum plantations, the exact opposite has occurred. Koalas have moved en masse into plantation blue gum plantations and as a result are killed, injured, orphaned and displaced during harvesting operations. Obviously, there are lots of differences between NSW and Victoria, including vastly different numbers of koalas. However, there is a cautionary tale in that intensive logging of any sort with no refuge areas or surrounding connected habitat for koalas and other animals to live in is unsustainable.

## **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**

Intact unlogged native forests possess inherent and tangible benefits to the entire ecology and economy of NSW. The native forest estate covers two million hectares in NSW and impacts the standard of living for so many towns and villages including water quality, recreation and tourism and also carbon storage and abatement.

The native forest industry is currently running at a loss and is being propped up financially by government subsidies. The tax-paying public should not be paying millions of dollars to destroy our own back yard.

Public native forests have a much higher economic value when they are allowed to function naturally and without logging.

Putting an end to logging is our pathway to increased water security. Native old growth forests store huge amounts of water that can be used for farming, fisheries, municipal uses, tourism, recreation. All of which far exceed any benefit or value of logging.

Not to mention these globally significant forests, particularly on the north coast of NSW, host a cornucopia of plant-based medicinal compounds. These compounds could hold the key to so many health issues and resistant strains and represent potentially billions of dollars to the health industry.

First Nations Ranger Programs, like the Githabul Rangers have been hugely successful at managing the recovery and health of native forests, including cultural burning.

Returning the forests to rightful indigenous ownership and management should form part of the transition away from native forest logging.

## **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**

Healthy native forests store carbon and are essential for reducing the impacts of climate change like increased frequency and intensity of bushfires, heat events and drought. Conversely, logging in native forests releases large amounts of carbon, contributing to climate change. Native forest logging in NSW is estimated to release 3.6 million tonnes of carbon every year.

Regrowing forests on average only ever hold up to 50% of the carbon of the original forests before they are logged again. Logging plantations produces 60% less carbon dioxide emissions than the logging of native forests. (Jen Sanger, Victoria's Forest Carbon 2022)

Unlogged forests are more resilient to the changing climate and catastrophic fires. They hold more moisture and represent a fundamental front line defence to climate-fueled fire.

Ending native forest logging would be the equivalent to removing 840,000 cars from the roads per year and will allow previously logged forests to regain lost carbon and make a significant contribution to meeting Australia's emissions targets.

In conclusion, it is time to acknowledge that the era of unsustainable forest logging in NSW is coming to an end and time to follow the lead of Victoria, Western Australia and the ACT and herald in a new more economically and ecologically sustainable era of plantation logging.

It is time to give Country and wildlife the breathing space it needs to recover so that it can continue to help protect Australia and Australians into the future. The time is now.

Yours sincerely



Josey Sharrad  
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*IFAW acknowledges the Traditional Custodians of country and their connection to land, waters and culture. We pay our respects to their Elders, past and present.*