Independent Forestry Panel

Public submission

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1. Sustainability of current and future forestry operations in NSW

"Forestry is the science and craft of creating, managing, planting, using, conserving and repairing forests and woodlands for associated resources for human and environmental benefits."

Forestry requires long-term management strategies, grounded in science, not ideological rhetoric or election cycles. On State forests, the sustainable yield is calculated over a rolling 100-year period, which were updated following the 2019-20 bushfires. Simply put, the sustainable yield is ensuring the amount of timber harvested or allocated under contracts does not exceed the growth rate of the forest. On the north coast, despite the widespread impacts of the fires, the long-term sustainable timber yield had only declined by 4% and "the models show that the total volume of timber produced today can be sustained over the long term" (Source: https://www.forestrycorporation.com.au/sustainability/the-story-of-forestry/timber-volumes-and-modelling). That sounds sustainable to me.

However, the intensity of the 2019/20 fires and the damage that they caused to native timber was highly variable. The worst impacts occurred in Eden, Tumut and the South Coast. In these areas the effect on sawlog sustained yield have been estimated by the Forestry Corporation at 13%, 27% and to 30% respectively. No data is available on the impacts of timber availability from private native forests.

Pine plantation forests can produce timber over 35–40-year rotations, hardwood timber plantations take 40-60 years to start to produce comparable sawlogs to those produced from our native forests. Generally, native forests take 60-80 years to produce sawlogs that industry utilises today, but the forests isn't just cut from one end to the other. Operations are dispersed both spatially and temporally, so whilst a compartment may be subjected to an operation every 10-15 years, each area within that compartment may not thinned for 20-30 years and not subject to a final cut for 60 years or more.

To put this in prospective, the Regional Forest Agreements (RFAs) were agreed to March 2000, which is half a pine plantation rotation, a third of a hardwood plantation cycle and a quarter of a native timber cutting cycles. The RFA was designed to find a balance between ecologically sustainable forest management, a sustainable timber industry (and regional economies) and a comprehensive, adequate and representative conservation reserve system. Neither side was happy (the timber industry was halved overnight) but both sides of the debate declared that the forest wars were over. Under the RFAs, of the 3 million hectares of public forest on the north coast, 88% is already managed for conservation and only 12% is available for timber harvesting. On average, just 6 trees in 10,000 are harvested each year and then regenerated (a condition of the Coastal IFOA).

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Native forest harvesting in NSW occurs on a very tiny scale, as in any one year about 0.2% of the 22 million plus hectares is harvested for timber and then every harvested tree is regenerated (regrown) under NSW law. Claims that sustainably managed native timber harvesting is a prime driver of the extinction crisis are blatantly false. Forestry in Australia has never been responsible for any species extinctions, and it is ridiculous to suggest that such a proportionally tiny amount of renewable forest use could pose an existential threat to any species of flora or fauna.

However, even within the areas to be harvested, extensive seasonal surveys are undertaken to determine what flora and fauna species are present or likely to occur and operations are planned to minimise any impacts on those species. Species conservation requires management at the landscape scale, not at the micro or individual scale. Bio-DIVERSITY by its very definition requires a variety of species compositions, structural variations, etc. The more diverse the environment from old growth to young regenerating trees, the greater the benefits for the widest range of plant and animal species. Timber harvesting, where operations are deliberately planned to be spread both spatially and through time across the landscape, provides that biodiversity by creating a mosaic of stand structures, age classes and feed sources whilst maintaining tree species composition.

Now 20 years later, after the RFA's were renewed like they were designed to be (because sustainable forestry works on 100 plus years cycles of regeneration, thinning, harvesting and regeneration), those same people who declared the forest wars over from the conservation movement 20 years ago want the rest.

Native timber harvesting on public forest in NSW (and Australia) is the most highly regulated in the world, is regulated by the NSW Environmental Protection Authority and is certified as sustainable to international standards through the Programme for the Endorsement of Forest Certification (PEFC), the largest international independent third-party certification scheme. The UN's Intergovernmental Panel on Climate Change recognises that managing forests for sustainable timber production plays a vital role in mitigating climate change.

In deciding the future of forest management in NSW, the Panel would be well advised to analyse the cost benefit of the management of the public's State forests compared to National Parks. Each year, FCNSW receives Community Service Obligation (CSO) funding "to provide a range of community services including recreational facilities, education, regulatory and fire protection services". The annual cost to NSW taxpayers in CSO funding to manage the 2million hectares of State forests is generally around $17M, which works out to be **$8.50 per hectare**. This public good funding is often referred to by activists, as subsidies. The last time you could check the NPWS Annual Report (about 2019), before it was hidden behind the veil of the Department of Planning and Environment, the NSW Government was paying around $850 million to manage its National Parks, which equates to **$121 per hectare**. It would seem that actively managed State forests, which also sustainably produce timber products (did I mention that half the weight of timber is converted CO2 stored as carbon!!), are actually a better spend of taxpayers' dollars.

The cost of managing National Parks is set to increase further, if the Recommendation 45 of the Black Summer Bushfire Inquiry is actually adopted by Government and NPWS. During the Black Summer fires, fires are allowed to burn in remote, inaccessible National Parks for long periods of time with minimal firefighting effort. It has long been the practice of both NPWS and Forestry Corp to let fires burn in remote areas, if conditions are favourable. Conditions were not favourable in the Spring of 2019 due to the prolonged drought. So, fires burning in remote, rugged terrain became a problem. There were 11,774 fires recorded during Black Summer. Of the 32 largest fires, 65% originated in National Parks, including the Gosper Mountain fire, which was the largest fire ever recorded from a single ignition point and burnt more than half a million hectares. Part of the problem is lack of reasonable access for initial attack. NPWS has a network of 31,000 km of fire trails to access their 7.2 million hectares of National Parks with only 10% of those trails being in good to very good condition (National Parks and Wildlife Service. Advice to the Bushfire Inquiry provided 25 March 2020). Conversely, "the Forestry Corporation builds and maintains 60,000 kms of fire trails and access roads to provide close and rapid access to fires for mitigation works, suppression and containment on its (2.16 million hectares) land" (Final Report of the NSW Bushfire Inquiry, 31 July 2020). The other problem is management intent which requires NPWS to balance altered fire regimes as a threatening process with their statutory responsibility as recognised fire authority. However, Recommendation 45 of the Bushfire Inquiry proposed that "in order to prioritise early suppression and keep fires small, Government set a KPI for NPWS regarding the percentage of fires that start on-park and are contained within 10 hectares, and consider whether 70% is an appropriate KPI for the NSW RFS and NPWS".

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

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If activists believe that "forest dependent fauna populations are in free-fall" towards extinction, perhaps they should ask themself what has changed for these species over the last 20 plus years. All old growth forests in NSW have been protected with more than 90% of the old growth forests

in National Parks. Old growth forests are strongholds of large hollow-dependent species, like Greater Gliders, Yellow-bellied Gliders and large forest owls. The prevalence of hollows also favours Glossy Black Cockatoos. The area and amount of native forest timber harvesting has been halved, whilst the regulatory compliance requirements have increased exponentially. So what has changed?

The most significant change that has occurred over the last 20 years or so has been the halving of the State forest estate and transferring vast areas of the most ecologically significant forests to National Parks. These areas were used to active and adaptive management, as Australia's native forests, and the flora and fauna they support, have evolved in response to active management over the last 60,000 years. Many of the major Black Summer fires originated from lightning strikes in remote areas of National Parks and conservation areas, where they were allowed to continue to burn for weeks and months in relatively benign conditions, until they emerged on a blow-up day on multiple fronts. Ironically, rather than focus attention on the failed lock-it-up-and-leave-it or wilderness strategy employed by conservation managers or the landscape-scale adoption of cool burning, similar to Indigenous practitioners over the past 60,000 years, there has been an increasing call to lock up more multiple use, proactively managed, production forests and condemn these forests and their inhabitants, particularly the koala, to a similar fate.

With 88% of NSW's public forests already managed for conservation, it seems counterintuitive to me that you would put all your "conservation and extinction avoidance" eggs in the one National Park basket, if you are seeking to ensure the survival of any species. Particularly, as no one knows how species are faring in the current National Park estate, as no one is willing to look (just in case it's NOT working). When someone does look, the results are not very flattering. The decline is species like the Southern Brown Bandicoot (44% in NSW and 100% (local extinction) in Victoria and South Australia), Hastings River Mouse, *Eucalyptus imlayensis*, *Prasophyllum correctum* (orchid), Eastern Brown Treecreeper, Superb Parrot, Broad-headed Snake and many other species is a direct result of the creation of new national parks and the exclusion of fire and/or grazing.

There have been NO EXTINCTIONS from sustainably managed timber harvesting in Australia. All mammal extinctions in Australia have occurred in the arid regions where there is NO forests (removal of Aboriginal burning) or on the islands that dot our coast (pests and weeds).

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

Despite being the 7th most forested country in the world, Australia is a nett importer of timber and paper products with a trade deficit of $4B.

Australia is heading for a timber supply crisis. Most house building and internal fitting depends on a ready supply of timber at reasonable cost. Australia's population is expected to increase to at least 30 million by 2035. Unless urgent action is taken now to develop domestic supplies of

timber for this increasing population Australia will import an increasing proportion of its timber needs. Imported timber will eventually be at higher prices due to transport costs and competition from emerging economies, particularly in China and Southeast Asia. Imported timber is likely to be produced from areas which do not have the same standards of forest practices as Australia.

Relying on increasing supplies of imported timber for house building will have serious consequences for young Australians.

Australian domestic softwood timber supply is expected to remain relatively static for the next decade and beyond, based on current policies, due to the areas of plantation which produce timber for housing having increased by only around 10% over the past 15 years. Australian domestic hardwood timber supply is decreasing and expected to continue declining due to continuing removal of native forests from commercial timber production, especially State-owned forests which are transferred to the National Park system.
Concrete, steel and other alternative building supplies are much more energy intensive than timber and are forecast to continue increasing in cost, so there is no easy substitute for timber in house building. Sawn timber from plantations takes at least 25 years to grow. That is why action needs to be taken now to avert this looming crisis.

New plantations need funding and suitable land. Australia now has more than adequate areas and representation of Australian native forest types held in reserves and National Parks, as a result of the Regional Forest Agreements and State decisions since then.

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

Despite being one of the world's most forested countries, Australia's plantation estate is declining coupled with a rapidly increasing population and a steady per capita consumption. The future global timber demand will be driven by emerging economies throughout Asia. Market research identifies shortfalls in the future stocking and consumption of forest products in China and India. Australia and New Zealand supply these markets with logs at a rate that exceeds its supply capacity and should be encouraged to facilitate new investment opportunities. And while both countries are engaged in forestation activities, forecasters suggest that their establishment rates are short of projected demands.

Australia has a need to replant and expand its softwood estate to provide structural timber to accommodate future domestic housing demands. The impacts of the 2019/20 bushfire season on NSW's hardwood and softwood plantation estate were devastating. Areas of the existing plantation estate that were catastrophically impact must be replanted and opportunities taken to consolidate and expand the estates around existing industry. Australia now has one million hectares of hardwood plantations established rapidly over the last two and half decades, mostly under Managed Investment Schemes (MIS). They were established to supply export chips for the Asian paper industry and hence the species planted were selected for pulping properties.

The contention that substitute timbers are readily available for those forgone when harvesting is excluded from native forest areas is incorrect. Australia's plantation estate does not provide substitutes for timbers foregone by excluding harvesting from native forests.

Ongoing demand for timber with special strength, durability or appearance features and declining supply has resulted in increased quantities of imported tropical hardwood timbers, in many cases from illegal harvesting in developing countries. Often there is limited ability to apply high environmental regulatory standards in such countries. In this regard, excluding harvesting from all Australian native forests for environmental reasons, at least in part, is exporting a larger environmental consequence to tropical forests of Southeast Asia which have been under severe environmental pressure for decades.

Australia's solution to ensuring imports are sourced legally has been to introduce legislation, that penalises importing merchants who cannot demonstrate their timber goods have been harvested legally. Legal harvest operations in some countries are no guarantee of sustainable forest practices either. This approach seems unfortunate given our capacity to regulate and provide sustainably harvested forest products locally.

A natural resource which has been neglected for many decades is the native timber found on private land. At present, less than a quarter of private native forest owners participate in private native forestry and the 7-million-hectare estate contributes less than a third of the State's native timber supply. For those that do engage in private native forestry there is currently minimal support or resources to assist them.

The state of private native forests is generally poor due to a long history of 'high grading' and no attention to fire management. With the right policy incentives there is considerable potential to enhance the health and productivity of private native forests which in turn would enhance their contribution to domestic supply. With the right incentives and encouragement, thousands of private landholders who are currently disengaged could become suppliers of sustainable native timber.

However, there is already a sector of the native timber industry that relies exclusively on private native forest for its survival. To think that PNF is the panacea to closing the public forests to timber harvesting is just kicking the can down the road.

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 management of native State forests under multiple-use management is a wise use of taxpayer funds, especially when compared to the National Parks expenditure. As previously mentioned, only 12% of the State's public forests are available for timber harvesting. The rest is

managed for conservation, both formally in National Parks and informally by prescriptions or protected areas. Claims by activists that the sustainable removal of timber from just 12% of our public forests is “an absolute basket case” “with hundreds of millions of our tax dollars lost logging native forests in recent decades” is a deliberate misinterpretation of the facts and a classic ideologue’s description of Community Service Obligations (CSOs).

CSOs are the delivery of services including road construction and maintenance for community purposes, firefighting and prevention for community purposes, recreation and tourism activities, community and government engagement, research and development and management of the parts of State forest not available for timber production (Annual Report 2022-23, Forestry Corporation of NSW, Pg. 26). Each year, the NSW Government funds a percentage of the cost of Forestry Corporation of NSW (FCNSW) providing to compensate for the delivery of services that a similar commercial business would not provide. FCNSW annually receives a meagre $8.50/hectare to manage their 1.8 million hectares of multiple-use native forest and 34,000 hectares of hardwood plantations for the public good. On the other hand, the National Parks & Wildlife Service receives on average $121/hectare to manage their 7.6 million hectares (before the costs were hidden within Department of Climate Change, Energy, the Environment and Water after 2019). Forestry Corporation land management seems to be a smarter spend of taxpayer dollars.

There are 9.3 million hectares of coastal native forests in the Regional Forest Agreement regions and that only 15,000 hectares or 0.16% is annually subject to (public) timber harvesting. Over a 20-year period this equates to just 3.2% of RFA forests. Despite this small footprint, Government allocates about the same money ($1.8M per year) to both the cross-tenure Landscape monitoring program and just monitoring the Coastal Integrated Forest Operations Approval on State forests. This equates to $120 per hectare for IFOA Monitoring and $1.80 per hectare for Landscape Monitoring, which still fails to include forests in the western region, River Red Gum forests or the National Parks surrounding the Sydney Basin.

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

Australia's native forests and timber products play a crucial role in carbon storage. However, to truly maximise their carbon sequestration potential, these dynamic ecosystems require active management.

Forests, like all living entities, undergo cycles of growth and development that are often interrupted by major disturbances such as bushfires and droughts. These events pose significant environmental risks.

During the 2019-20 wildfire season, over 5 million hectares of native forests along Australia’s eastern seaboard were devastated, releasing an estimated 830 million tonnes of carbon dioxide equivalent (MtCO2-e) into the atmosphere. Most of these affected areas were within National Parks, highlighting that even protected regions require active management to mitigate environmental threats.

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Active forest management is essential to reduce the impact of such disturbances, which can significantly hinder a forest's progression from 'regrowth' to 'old growth'.

To optimise carbon storage, it's important to consider how rapidly trees sequester carbon through their life cycle.

Young trees capture and store carbon more effectively, with peak sequestration occurring between 10 to 30 years. However, as trees mature — around 80 years for eucalypts — their carbon capture rate diminishes. This is due to balancing new growth with carbon released from decay.

Sustainably harvesting trees in their early mature phase can maintain optimal carbon sequestration rates, ultimately allowing forests to store more carbon over time than if left unmanaged.

Beyond the forest, harvested timber products also contribute to long-term carbon storage.

Timber products boast extended service lives. For instance, furniture made from solid or composite wood can last up to 30 years, while timber used in construction can endure up to a century.

A timber-framed home stores approximately 7.5 tonnes of carbon, contrasting sharply with the 2.9 tonnes emitted by a steel-framed house.

The energy efficiency of producing wood products further enhances their carbon benefits. Compared to alternatives, timber manufacturing requires significantly less energy — 19 times less than steel, 45 times less than plastic, and 85 times less than aluminium, which is particularly advantageous for the construction sector.

In conclusion, active forest management is vital for maximising carbon sequestration and reducing environmental impacts from natural disturbances. By prioritising sustainable practices, we can ensure our forests continue to serve as robust carbon sinks, benefiting both our environment and economy.

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