

Public submission

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1. Sustainability of current and future forestry operations in NSW

Plantation forestry, not the logging of native forests, is the only option for sustainable forestry in NSW. It is profitable and productive, also providing strong and ongoing levels of employment. Logging in native forests has not been a sustainable industry for years, if ever. It is only an extractive industry that does not replace the original forest types and habitats – even those that have been reestablished since previous (and less intensive) logging. Economically, native forest logging is totally reliant on government subsidies. NSW Forestry Corp is a loss-making organisation, meaning NSW taxpayers are providing profits to a small number of companies and investors at monetary cost as well as the loss of forest areas. From both perspectives, NSW taxpayers will be best served by ending native forest logging immediately.

Environmental sustainability. Native forest logging is not sustainable as it reduces overall biomass and vital carbon storage. It especially takes out mature trees and their large nectar and browse resources. Mature forest trees e.g. 100 years old or more, are the only ones that can provide hollows that so many different species depend upon for nests and dens, especially the Greater Glider. Logging of mature trees with their higher canopies also increases fire threat, reduces stream flows, promotes weeds and dieback, and increases erosion and stream pollution. Current industrial-scale logging practices are also harmful and often indiscriminate in themselves. The heavy machinery used creates much collateral damage to the forest and selectivity e.g. preservation of den trees, often does not take place, as revealed in post-logging audits. Forestry Corp's breaches of EPA/logging rules number in the hundreds and are well-documented. Native forestry is disastrous environmentally, not merely unsustainable.

Economic sustainability. Native forest logging accounts for a tiny amount of sawn timber in NSW and logs are almost all used for low value products such as woodchips, toilet paper and pallets. The value added by preserving native forests for their biodiversity, water quality, carbon sequestration and tourism opportunities is vastly higher (Keith et al, 2017). For all the damage that is caused by native forestry logging, NSW Forestry Corp's own Annual Reports show that it loses millions of dollars each year, e.g. \$20 million in 2020-21 and \$9 million in 2022. In 2023 Forestry Corporation lost \$15 million on their hardwood operations, a cost of \$1,281 for each hectare logged. Research shows the number of jobs in cutting, haulage and processing is very small compared to the claims sometimes made that many thousands are employed: e.g. there are less than 400 jobs in south-eastern NSW according to a report by Frontier Economics and ANU (2021). Conversely, a Price Waterhouse Coopers analysis in 2016 showed that the investment required for just one full-time equivalent job in native forestry was over \$5 million. Preservation of native forests, unlogged, for water security, biodiversity, better fire protection and tourism is the only economically sustainable approach, both in the short and long-term. If the Government wishes to subsidise or support industries and employment, there are effective ways to do so – including within a reimagined plantation forestry and timber processing sector – without also destroying state forests or important areas within them.

References:

- Frontier Economics and ANU, 2021. *Comparing the alternative value of alternative uses of native forests in southern NSW*. Frontier Economics and ANU, Singapore.
- Keith H., M. Vardon, J.A.R. Stein, J.L. Stein & D.B. Lindenmayer, 2017. 'Ecosystem accounts define explicit and spatial trade-offs for managing natural resources.' *Nature, Ecology and Evolution*, **1**:1683-92.
- Price Waterhouse Coopers, 2016. *Rethinking Victoria's approach to forestry*. Price Waterhouse Coopers, Melbourne.

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

Native forests provide vital habitat and refuges for a range of threatened species including Koalas and the endangered Greater Glider. Forests are vital as water catchment but provide far less water after logging (Vertessy et al 2001; Taylor et al 2019). They generate rainfall, filter water and regulate runoff to streams, removing carbon dioxide from the air and storing it in their wood and the soils. Mature native forests also are less vulnerable to bushfire; young forests, including regrowth after logging, are much more flammable. Native forests thus need to be left to grow higher canopies and varied stories over time. These forests are also highly valued for recreation and tourism and are used increasingly. This has flow-on benefits for physical and mental health outcomes (also helping to reduce medical costs) in the community, as well as employment. However, these values are currently being degraded in the proposed Great Koala National Park as logging continues in areas likely to be protected. Last but far from least, there are many areas of cultural value to Aboriginal people, especially in the Great Dividing Range forests, which native forestry disturbs and frequently overrides.

References:

Taylor, C., D. Blair, H. Keith, and D.B. Lindenmayer. 2019. Modelling water yields in response to logging and Representative Climate Futures. *Science of the Total Environment* **688**:890-902.

Vertessy, R.A., F.G.R. Watson and S.K. O'Sullivan. 2001. Factors determining relations between stand age and catchment water balance in mountain ash forests. *Forest ecology and management* **143**:13-26.

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

Native forest logging in NSW provides an extremely small proportion of its sawn timber: Government data showed that by 2022, 90 percent of native forests logging will go to make paper or woodchips (ABARES 2021). These low value products are worth far less than the benefits of keeping native forests unlogged. Plantation timbers have replaced native hardwoods in most applications, including housing, and is better suited to modern construction. Our timber needs can now be mostly met from existing plantations, and these should also be expanded for future timber needs and export.

References:

ABARES. 2021. *Australian forest and wood products statistics: march and June quarters, 2021*. Australian Bureau of Resource Economics and Sciences, Canberra.

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

Private native forestry needs some regulation in NSW to prevent aggressive clearfelling and bad environmental and land management practices. These can lead to lead to fire-prone hotspots, the breaking up of wildlife corridors and damage to water catchments. Protection of public forests by stopping native forest logging is the best way to limit the impact of these problems. However, given that hardwood and softwood plantations provide 91% of Australia's log production, the proportion of saw and veneer logs obtained from hardwood plantations will need to increase. With the end of competition from subsidised public forests, there will be an increased demand for selective logging of speciality purpose hardwoods from well managed plantations and private native forests lots. Transitional arrangements for the native forest logging industry could include support for the establishment of further plantations and

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nurseries and investment in advanced forms of processing for creating higher grade timber products for export or sale in Australian markets (including new supply chains). Note that new plantations should not result from the conversion of existing native forest to plantation.

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 demand for clean water at reasonable cost by growing populations, especially east of the Great Dividing Range, is a major reason that native logging should be ended immediately: intact state forests provide greater and cleaner yields of water. Mature and unlogged state forests also provide greater protection from bushfires: regrowth and young forests, including areas 'thinned' of large trees, are more prone to damaging fires compared to mature forests with their higher canopies and varied stories of growth. If we consider that the costs of the 2019-20 fires in eastern Australia have been estimated at \$100 billion (Bushfires and Natural Hazards CRC, 2020) it would be negligent – perhaps criminally so – to pursue any other course than to regrow resilient native forests. However, managing this does not include forestry by stealth e.g. 'active management', 'forest gardening' or 'thinning': there is no evidence for claims that these will make forests more resilient to wildfires. Rather, as an investment, the cessation of logging and science-based stewardship of state forests will provide vital environmental, economic and social outcomes in the long-term as forest mature, including employment in new, sustainable forms of timber processing and forestry regeneration. This will be an increasingly valuable dividend.

Reference

Bushfires and Natural Hazards CRC, 2020. Calculating the losses this fire season. Bushfires and Natural Hazards Cooperative Research Centre, Melbourne, 1 June, 2020

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

Research shows that intact native forests store much more carbon than logged and regenerated native forests (Keith et al. 2014). At present, native forest logging in NSW is releasing some 3.6 million tonnes of carbon (CO₂) per year, equivalent to the annual emissions of 840,000 cars. Thus, stopping logging will have a major impact on our ability to meet greenhouse gas reduction targets. This is beside the fact that the 2019-20 bushfires, increasing droughts and fires due to climate heating are themselves having a significant impact on biodiversity, tree growth and resilience, and forest and rainforest species. Stopping native forest logging will allow forests to recover and reduce these impacts over time, becoming better able to withstand future disasters with larger reserves as well as countering climate heating by removing CO₂ from the atmosphere. This would make a very important contribution to lowering the risks of climate change in the long term and put our greenhouse gas reduction targets well within reach.

Reference

Keith, H., D. B. Lindenmayer, B. G. Mackey, D. Blair, L. Carter, L. McBurney, S. Okada, and T. Konishi-Nagano. 2014. Managing temperate forests for carbon storage: impacts of logging versus forest protection on carbon stocks. *Ecosphere* 5(6):Art. 75. [online] <http://dx.doi.org/10.1890/ES1814-00051.00051>.