Independent Forestry Panel

Public submission

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Topic 1:
Sustainability of current and future forestry operations in NSW

Sustainability refers to the practice of meeting the needs of the present without compromising the ability of future generations to meet their own needs. It involves a balance between environmental, social, and economic considerations to ensure long-term viability and health of natural systems, human communities, and economies. In essence, sustainability promotes responsible resource management, reducing environmental impact, and fostering equity for current and future generations.

To achieve this, we need to undertake combined efforts to help ensure the long-term sustainability of forests, preserving their ecological functions while supporting the needs of people and the economy. None of these elements can be diminished if we are to achieve sustainability (i.e. you cannot focus solely on the environment to the detriment of the people and the economy as this model will ultimately collapse in the long run). This will involve:

- **Sustainable Forest Management (SFM):** Implementing practices that maintain the health, productivity, and biodiversity of forests while allowing for the responsible use of forest resources. This includes selective harvesting, replanting, and maintaining natural regeneration cycles. The current CIFOA rules that apply to our public native forests are built on political wins and personal agendas rather than science. These rules need to be reviewed with silvicultural outcomes and fire mitigation at the forefront. We need to look at overseas models that are reintroducing selective harvesting to reduce the risk and severity of severe wildfires destroying their forests and placing the public/homeowners at extreme risk. Managing our State forests under the true principles of sustainability, allows forests to provide both economic and environmental benefits, which can be important in areas where communities rely on forest resources for their livelihood.
- **Conservation of Biodiversity:** Protecting and preserving diverse plant and animal species within forests to maintain ecological balance. This includes designating protected areas, restoring degraded habitats, and preventing deforestation in biodiversity-rich areas. Clearing and deforestation of our public native forests does not currently occur and is not a policy of the NSW Government. NSW State forests harvests approximately 1% of its 1.8 million hectares annually. The forests are also managed under a Forest Management Zone system, which safeguards environmentally sensitive areas and tailors' management practices to the specific ecological sensitivity of each zone.
- **Reforestation and Afforestation:** Actively planting trees in deforested or degraded areas (reforestation) and planting trees in areas where there were no forests previously (afforestation) to restore ecosystems, reduce carbon emissions, and improve air and water quality. A greater emphasis needs to be placed on assessment of regeneration and 'infill' planting to maintain forest health post-harvest. Afforestation needs to be promoted through the establishment of new hardwood plantations.
- **Reducing Deforestation:** Implementing policies to minimize illegal logging, unsustainable agriculture, and land conversion that led to the loss of forest cover. Encouraging sustainable land use and enforcing regulations are key strategies.
- **Forest Certification:** Supporting certification programs like the Forest Stewardship Council (FSC) and the Programme for the Endorsement of Forest Certification (PEFC), which ensure forests are managed responsibly and sustainably is key. Our State forests have been sustainably certified to Responsible Wood and PEFC since 2006.
- **Promoting the Use of Local and Renewable Resources:** Australia needs to encourage the use of locally sourced timber and forest products to reduce the environmental impact associated with importing materials from unsustainably managed forests. Australia is a net importer of

timber and forest products, with a strong national demand for these sustainable resources. Our native forests are capable of supporting sustainable timber harvesting, providing essential supplies to local communities. Halting native forest harvesting would lead to an increase in timber imports, contribute to a higher carbon footprint due to international shipping and transportation, raise the local cost of living, and yield no significant environmental benefits compared to the current forest management practices. Australia is a net importer of timber, importing timber valued at nearly $6 billion each year (*3. Market Dynamics in the Timber Industry – Parliament of Australia (aph.gov.au)*).

- **Community Involvement and Indigenous Rights:** Engaging local and Indigenous communities in forest management decisions, ensuring that their rights and traditional knowledge are respected, and that they benefit from the forest's sustainable use. Our State forests are progressively implementing ILUA's and have a dedicated Aboriginal Partnerships Program.
- **Monitoring and Technology:** State forests are utilizing technology such as satellite imagery, remote sensing, and geographic information systems (GIS) to monitor forest health, detect illegal activities, and manage forest resources effectively. As there has been a recent commercial focus, resources have been put into new technology to ensure effective monitoring and enhancement of procedures and safety.
- **Climate Change Mitigation:** State forest are effectively managing forests as carbon sinks to absorb carbon dioxide, while also adapting forest management practices to address the impacts of climate change, such as increased fires, pests, and disease. The Australian not-for-profit organization, Planet Ark, has partnered with Forest and Wood Products Australia to promote the use of responsibly sourced wood as a building material, aiming to address climate change. For more information, visit makeitwood.org.
- **Public Awareness and Education:** Promoting awareness about the importance of forests and educating stakeholders, from policymakers to the general public, about the need for sustainable practices to preserve forests for future generations. It's no secret that the Forestry industry is not good at promoting the positive impact they have on the Australian environment and economy. More emphasis needs to be put into debunking the many myths that exist around selective harvesting and our regenerating forests. If we are to maintain a truly sustainable environment a program needs to be developed and funded by the government to turn this around. At the moment, the future sustainability of our forests is being shaped by a small handful of people who do not have a proper understating of the industry or our native environment.

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

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- There have been several studies that have found that regulated timber harvesting has not had a significant impact on Koala density. *"The results of these findings in no way suggest that concerns about the status of the koala in the wild are unfounded, or that they are not now absent, rare or declining in some areas. Rather, it is important to acknowledge and respond to the very real threats that koalas suffer in different parts of their range. While habitat clearing, cars and roads, dogs, disease and fire are demonstrated, well-known threats to the koala, this research indicates that timber harvesting as practised under the comprehensive rulesets applying in the native forests of north-east NSW, is not".* Refer to Brad Law studies, Principle Research Scientist in the Forest Science Unit, NSW DPI. *Bradley Law (nsw.gov.au)*.
- As a State we need to look at science and studies to determine the real reasons why some species are declining instead of getting caught up in emotional 'pseudoscience', which many of our environmental activists perpetuate.
- Public native forest harvesting in New South Wales is subject to stringent regulations under the Integrated Forestry Operations Approvals (IFOAs). These regulations encompass measures designed to protect environmental values, including water quality, soil health, and habitats for endangered species.
- I have previously worked in the timber industry abroad in countries such as Cambodia, Laos, Papua New Guinea and Somatra. I can unequivocally state that Australian timber, particularly that sourced from NSW, is managed in a more environmentally sustainable and socially acceptable way than timber produced in developing countries, which is the source of many of our imported timber products.
- Forest certification schemes, such as the Forest Stewardship Council (FSC), often have country-specific regulations that are commonly less stringent in developing nations. Consequently, these countries are not held to the same rigorous standards as those applied to timber produced in Australia. New South Wales is recognized for having some of the most stringent environmental harvesting regulations in the world.
- Locking up for forests or restricting access and management practices can inadvertently promote greater fire risk through fuel accumulation, lack of active management, increased density of vegetation, altered fire regimes, limited access for first response, disruption of natural firebreaks, increased human ignition sources and ecological imbalance. Our public State forests serve many benefits in reducing the risk of catastrophic wildfires which can have a significant impact on our forests. These being:
    - 'Thinning' or harvesting can reduce fuel loads and create firebreaks. Roads and tracks are usually maintained or upgraded close to the time of harvesting which can serve as well managed, critical and strategic firebreaks.
    - Some ecosystems rely on natural fire regimes to maintain ecological balance. When forests are locked up, natural fires may be suppressed, leading to an unnatural accumulation of fuels. When fires do occur, they can be more severe due to this excess fuel.
    - Their large contractor based has intimate knowledge of the bush and the required skills to operate both effectively and efficiently to extinguish wildfires as quickly as possible. Should the contractor base in NSW decrease due to locking up our forests, this resource would not exist. Our public State forest contractors played a critical role in the 2019/2020 bushfires. If they, and their specialised equipment where not available the outcome for life, property and the environment would have been far worse.

    - Restricting access does not eliminate human activity in forests; instead, it may concentrate visitors in certain areas, leading to increased risks of accidental ignitions from campfires, discarded cigarettes, or other activities.
    - Some species that thrive in a managed environment may struggle in a locked-up forest, leading to ecological imbalances that can affect the overall health of the forest. Unhealthy forests can become more prone to fires.
- Different forest types and ecological communities are already well represented in National parks and reserves as they cover over 7.6 million hectares of land, which represents more than 9.5% of the land in NSW.

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

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- Australia is a net importer of timber and forest products, with a significant national demand for these sustainable resources. Our native forests have the capacity to support sustainable timber harvesting, thereby supplying essential materials to local communities. Discontinuing native forest harvesting would result in an increase in timber imports, exacerbate our carbon deficit due to the emissions associated with international shipping and transportation, elevate local living costs, and yield no discernible environmental benefits compared to the current forest management practices in place.
- The ability to harvest timber from our public State forests creates jobs and supports the local economy, particularly in regional communities dependent on the forestry industry. This economic activity is a significant advantage compared to National Parks, which do not permit such extractive use. I grew up on a farm and have lived in rural Australia for most of my life. I have seen the negative impact on people's mental health, the breakdown of family units and the decline in 'community' as a result of economic downturns and job losses in rural Australia. Locking up our public State forests will contribute to this.
- Durable hardwood timbers, essential for utility poles, marine piles, and high-quality housing and restoration projects, represent a significant and irreplaceable resource found in the North Coast NSW State Forests. Annually, these forests provide:
    - 43,272 m^3 of specialty products, including poles, veneer, and piles
    - 222,628 m^3 of sawlog-quality timber
    - *Sustainability Report FCNSW*.
- A reduction in native forestry operations would severely affect the availability of hardwood timber, a critical resource for infrastructure, transport, and mining industries.
- A report by the Department of Agriculture, Fisheries and Forestry indicates that domestic hardwood sawlog availability from existing plantations and native forests is projected to surpass future demand for hardwood sawlogs by 2050.
- Meanwhile, the Australian Bureau of Agricultural and Resource Economics and Sciences (ABARES) estimates that imports of softwood sawn wood will need to double between 2020 and 2050 to meet the increasing demand.
- We are currently in a cost of living and housing crisis and we are debating locking up sustainably managed forests which would lead to increased timber prices while actually having a negative effect on the global environment.

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

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- Plantations, both softwood and hardwood have the potential for expansion however they are limited by factors such as land availability, low financial returns, long growth cycles needed to produce commercial timber and land suitability.
- Plantation expansion will be in direct competition with our Agriculture industry which is facing the increasing effects of climate change and increased demand of population growth. Plantation cannot be a direct replacement for harvesting of native forests.
- Not all regions are environmentally suitable for hardwood plantations. Hardwood species often require specific climates, soil types, and water availability to thrive. Finding large tracts of land with optimal growing conditions can be difficult, and climatic variations such as droughts or floods can affect the long-term viability of plantations.
- Logs harvested from native forests, hardwood plantations, and softwood plantations are not always directly interchangeable due to differences in species, age, and silvicultural practices, all of which influence the wood's properties and its potential uses. The range of species suitable for hardwood plantations is quite limited, as many are not economically viable to cultivate in plantation settings due to their slow growth rates. Should native forests be locked up and harvesting prohibited, products such as poles, piles, and girders would either become unavailable or experience a significant reduction in supply.
- These high-value products are primarily utilized in structural applications, including utility service poles, pole-frame homes, foundation supports for wharves, boardwalks, and buildings (piles), as well as support beams in bridges (girders). The advantages of these products include durability, cost-effectiveness, excellent service life across a wide range of conditions, high strength and fatigue resistance, ease of handling, and their ability to sequester carbon.
- Establishing hardwood plantations is capital-intensive, requiring significant upfront investments in land preparation, seedling purchase, planting, and ongoing maintenance (such as pest control, thinning, and irrigation). These costs, combined with the long maturation period, make it a riskier venture than managing and harvesting our native forests. A significant amount of money will need to be invested into plantation establishment if we are to increase our supply from these forests in 30-40 years. Careful planning would need to be undertaken so mistakes of the past aren’t repeated and we end up with small pockets of plantation scattered across the landscape which are too expensive to harvest or have no access.
- There is also a lack of investor confidence in plantation establishment with the rise and fall of MIS schemes across Australia. These schemes were heavily invested in northern NSW.
- The Plantation and Reafforestation Code refers to plantation security however, this is currently questionable as areas, and in some cases, large tracts of plantation (i.e. planted trees) are being excluded from harvesting due to unscientifically based unique and special wildlife value rules that have been developed on the fly without any consideration to plantation security or environmental outcomes.
- Over the last 10-20 years there has been less investment in research and development for improving hardwood species suited to plantation forestry. Breeding programs aimed at

faster-growing, disease-resistant, and high-yielding hardwoods are limited, which reduces the potential for significant productivity gains in this sector over the short term.

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

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- Our public State forests often provide a wider range of recreational opportunities than National Parks, including hiking, camping, horse riding, dog walking, archery, shooting clubs, mountain biking, and even off-road vehicle use. These activities can coexist with sustainable forest management, making the forests accessible for multiple user groups.
- Our public State forests are often more closely integrated with local communities, allowing for the sustainable use of resources that support regional economies. This can promote stronger community stewardship and responsibility for forest management.
- State forests often involve local communities and Aboriginal groups in their management through joint management programs and community consultation processes**.** This engagement can ensure that traditional knowledge and local socio-economic needs are integrated into forest management, providing more holistic outcomes compared to the more centralized conservation focus of National Parks.
- All of our public State forests have fewer restrictions on access compared to National Parks, allowing more diverse recreational activities without the need for entry fees or permits. In a nation that is glued to their mobile phones and technology having these areas available and free is a necessity.
- State forests, both native and plantations support the local economy through the sustainable harvesting of timber, which provides raw materials for industries such as construction, furniture, and paper production. Timber from State forests reduces reliance on imports, supports domestic industries, and contributes to regional economic stability. Managed harvesting, particularly through selective harvesting and rotational harvesting, ensures long-term timber supply while maintaining forest health.
- Forestry operations create direct and indirect employment opportunities, particularly in rural and regional areas. Jobs in harvesting, timber processing, transportation, and related industries contribute to local economies, supporting livelihoods and maintaining regional development. Employment through tourism, via the many and varied activities you can undertake in State forests would decrease if it were to be locked up in a National Park.
- State forests have developed two award winning tourist attractions on the North Coast being Sealy Lookout and Guulabaa. They have also successfully partnered with the Port Macquarie Kaola Hospital which has purpose built facilities that are on State forest. The Koala Hospital also sees over 100,000 visitors annually. Visit the world-famous Port Macquarie Koala Hospital!
- There are numerous economic opportunities (such as beekeeping, cattle grazing, and event hosting) as well as social activities (including trail biking, horse riding, four-wheel driving, and dog walking) that are inadequately supported under the current National Park model in NSW. The economic, social, and tourism benefits associated with these activities have been evaluated on multiple occasions, consistently demonstrating that a hectare of native State forest generates significantly greater economic, social, and heritage value to the community than the same area would under National Park designation.
- State forests also provide opportunities for both commercial and non-commercial firewood collection, which is unique to State forests. Commercial firewood collection from State

forests provides the bulk of the firewood market to Sydney, Melbourne and Adelaide, as well as Bunnings. Reliance on this resource to heat people's houses will increase with the cessation of native forest harvesting in Victoria. Non-commercial firewood collection across rural NSW is substantial with approximately 1,500 permits officially issued each year. Rural communities and towns rely on having accessible State forests nearby to source their firewood from.

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

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- Harvesting timber locally from State forests reduces the need for importing timber from overseas, which often carries a larger carbon footprint due to transportation emissions. Local sourcing supports both environmental sustainability and economic resilience.
- Ensuring forests available for timber production are located across the state, and the mills and processing facilities are also available locally, is imperative in ensuring that this carbon footprint remains low.
- The Intergovernmental Panel on Climate Change acknowledges that sustainably managed production forests, which store carbon in growing trees while producing an annual yield of timber, offer significant and sustained climate change mitigation benefits.
- Additionally, wood has a considerably smaller carbon footprint compared to commonly used building materials like steel, aluminium, and concrete. As such, responsibly sourced wood can play a pivotal role in addressing climate change.
- Sustainable forest management involves selectively harvesting trees while allowing the forest to regenerate, ensuring continuous carbon sequestration. As new trees grow, they absorb carbon dioxide from the atmosphere, acting as a carbon sink. Well-managed forests can maintain or even increase their capacity to sequester carbon over time, contributing to long-term climate change mitigation.
- Harvested timber stores carbon for the lifetime of the product. When used in long-lasting products such as buildings, furniture, or infrastructure (e.g., utility poles, bridges), the carbon absorbed by trees during their growth remains sequestered for decades, reducing atmospheric CO_2 levels. This storage function contrasts with fossil-based materials, which release significant amounts of carbon during production.
- Although there is no biofuel produced from native forests, there is capacity to better utilise this renewable resource.
- Harvesting residue from hardwood plantation harvesting, such as branches, sawdust, and offcuts, can be used as biomass for renewable energy. Bioenergy derived from forest by-products is considered carbon-neutral because the carbon released during combustion is roughly equal to the carbon absorbed by the trees during their growth. This can help reduce reliance on fossil fuels, further contributing to carbon reduction. NB: There is no biofuel produced in NSW from our public native State forests.
- Active forest management helps mitigate the risks of forest degradation and large-scale wildfires, which can release massive amounts of carbon into the atmosphere. Thinning overgrown forests, reducing fuel loads, and maintaining forest health through managed harvesting can prevent catastrophic wildfires and pest outbreaks, both of which are exacerbated by climate change and can lead to significant carbon emissions.