

Public submission

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Submission ID: 203198

Organisation: *N/A*

Location: *New South Wales*

Supporting materials uploaded: *Attached overleaf*

Submission date: 10/8/2024 12:35:58 PM

Submission by John O'Donnell to NSW forest action plan dated 8 October 2024

Contents

1	Introduction	3
2	Concerns over fairness of process and listening to submissions	4
3	Seven (7) topic areas requested for the forestry action plan	5
1	Sustainability of current and future forestry operations in NSW	5
2	Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values	8
3	Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail	12
4	The future of softwood and hardwood plantations and the continuation of Private Native.....	13
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	15
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.	20
7	Greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests (added by the Minister).....	24
4	Assessment of state and local government decision failure approaches and games to assess native forestry not right, fair nor in the national interest.	24
5	Consequences of current inadequate support of native forestry and over overzealous regulation	26
6	Assessment the industry and the environment 40 years ago and 30 years' time	26
7	Conclusions	27
	Annexure A. Recent activity to add Koalas and 34 other threatened species to the Biodiversity Offsets Scheme and there are broader biodiversity failures.	29
	Annexure B. Important report prepared by Venn report for Qld but applies to N NSW	31
	Annexure C. Failures of NSW climate change and biodiversity direction	33

1 Introduction

I am a retired district forester in NSW and environmental manager for hydro-electric construction in Tasmania; major dual carriageway highway construction projects in NSW with 45 years' experience and 6 years' experience with NSW EPA and I am currently active in relation to Australian fire, natural resource, forest decline and other issues. My main interests are low intensity maintenance burning of forests, addressing the culture of massive fuel loads in our forests setting up large bushfires, forest health/ eucalypt decline, establishing safe/ healthy and resilient landscapes, active and adaptive forest management, fire fighter practices and safety, town and city bushfire safety, disaster avoidance, rising disaster and insurance costs and effective learning capture.

I believe that my broad skillset and experience in relation to the areas covered by the forestry action plan represents an extremely valuable opportunity for NSW, and hopefully the free advice and learnings will be utilised to maximum effect.

The NSW Government Make an online submission document used a 6 part topic breakup for submissions.

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:

- 1. Sustainability of current and future forestry operations in NSW*
- 2. Environmental and cultural values of forests, including threatened species and Aboriginal cultural heritage values*
- 3. Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail*
- 4. The future of softwood and hardwood plantations and the continuation of Private Native Forestry in helping meet timber supply needs*
- 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*
- 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.*

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 at the bottom of this page and will also be accepted and considered by the Panel.

However, forestry media release news NSW state politics timber by Contributor, ARR.News 26 August 2024 The Hon. Penny Sharpe, Minister for the Environment (NSW), The Hon. Tara Moriarty, Minister for Regional NSW, Joint Media Release, 26 August 2024 used a slightly different 7 topic breakup:

The Plan will address the following key areas:

- Sustainability of current and future forestry operations in NSW;*
- Environmental and cultural values of forests, including threatened species;*
- Community 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;*
- Opportunities to realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks; and*
- **Greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests.***

Unfortunately, this is different wording from the submission document topic list and a 7 th topic has been added, highlighted in bold above. This highlights a disappointing change in process.

For this submission, I have used the NSW Government topics (6 topics above) and added the 7 th topic by the Minister “Greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests.”

2 Concerns over fairness of process and listening to submissions

Unfortunately, I have considerable experience with reviews, inquiries and commissions where in many cases submissions are not properly considered nor actioned and as a result there are ongoing lingering disasters, failures and poor practices. Worse, in most cases the same problems are occurring and getting worse, putting people and communities at risk and resulting in rapidly increasing disaster costs.

A very good assessment of panel failures is outlined in the Quadrant document “The Utter Failure of yet another Bushfire Panel” by Roger Underwood dated 19 November 2020. <https://quadrant.org.au/opinion/doomed-planet/2020/11/the-flaming-idiocy-of-yet-another-bushfire-panel/> As noted in the article “Bushfire management in Australia must be based on preparedness and damage mitigation”.

Another important document outlined another document in relation to failures. IFA Media Release of Friday 30 October 2020 titled Underwhelming Bushfire Royal Commission report lacks vision needed to address Australia’s bushfire woes, The Bushfire Royal Commission’s final report is totally underwhelming and fails to address, the current imbalance between fire prevention and fire response says the Institute of Foresters (IFA/AFG), the professional association representing some 1,000 forest scientists, researchers and professional forest managers in Australia.

There are a lot of other concern documents out there, refer to inquiry and commission submissions as a start.

The articles highlight failure types that occur in much more than bushfires.

Then I see an article on 30 September titled Panel reviewing the idea of ending native logging in NSW and the words: *A government appointed panel is exploring the idea of ending logging in NSW native forests within four years. The government is under mounting pressure over the impact of its own logging business on nature. Source: Australian Associated Press*

The historically divisive issue of taking slow-growing hardwoods from native forests has become even trickier as the government works to deliver its promised Great Koala National Park.

A government appointed panel is exploring the idea of ending logging in NSW native forests within four years.

I ask where is this discussed in relation to the forestry action plan review.

Then I consider the narrowness of the criteria in relation to the forestry action plan, further highlighting my suspicion in relation to the process.

I then ask myself what are the forestry and fire skills of the people undertaking the assessment and considerable anti forestry sentiment in government.

Then I consider the involvement of the Independent Planning Commission, with a focus on planning, increasing my suspicion of the whole process.

Taking a lot of factors into account, I have major concerns re the whole non-support of native forestry process in NSW and what is going on behind the scenes, including:

- a mass of one sided actions, media and press in relation to the great koala park;
- recent additional threatened species requirements in relation to additional offset requirements, with miniscule consultation;
- activist management approaches;
- ongoing regulatory creep;
- the fact that native forestry occurs on a very small percentage of forests lands;
- optimising land in conservation areas to meet 30 % targets;
- appeasing the greens;
- questions in relation to independence and vetting risks/ issues in assessing submissions and discussions;
- inadequate direct involvement of forestry in political decisions;
- nil to inadequate bushfire expertise in making decisions;
- nil understanding of adaptive management, eucalypt decline and forest fire resilience;
- inadequacy of listening;
- ongoing failures of conservation land management that never get reviewed;
- piecemeal approaches regularly used in NSW;
- potential games with climate change credits;
- behind the scenes activities; and

- a panel apparently with options the public aren't aware of.

In light of the above and past experience, I am not overly optimistic relation to this forestry action plan in relation to what this plan is going.

Hopefully, the government and panel will listen in relation sensible submissions in relation to the forestry action plan and see the importance of no changes in native forest areas and undertake a massive review of failed conservation management.

3 Seven (7) topic areas requested for the forestry action plan

The seven topic areas for the forestry action plan are outlined below.

1 Sustainability of current and future forestry operations in NSW

This issue is addressed below, under bolded headings.

1.1 Forest management is sustainable

Native forestry activities are sustainable in NSW. Native forestry in NSW is also highly regulated, aiming to balance economic and environmental interests.

I suggest that the panel and Government think back about native forestry over the last 180 years and the important forests that abound, much of this due to the professionalism of the forest industry. Many of these forests were transferred to national parks, perversely to a lock up and let it burn for intense bushfire mentality approach, these forests are now declining, more on this below. Conservationists and activists conveniently ignore this issue, at the expense of intense bushfires.

As noted by Joel Fitzgibbon in an opinion piece – originally published in the Australian Financial Review 15/8/23. Careful harvesting of native forests is the key to carbon capture Australian Forest Products Association 15 August 2023:

Just 0.06 per cent of Australia's native estate is available for harvest – just six in every 10,000 trees is harvested each year. Further, on mainland Australia harvesting is approved only in areas which have been harvested previously.

I understand that public native forests in NSW undergo selective harvesting, and no clear felling occurs, and I understand that only about 0.5% of the state forest is harvested annually.

The areas of harvesting each year on state forests lands is small, yet a vibrant industry is achieving great success.

It is staggering to me as a resident of NSW to see NSW on a path that seeks to destroy this industry and employment and multiplier workforce. And conveniently ignore the low rates of harvesting, Flora Reserves, recreation areas, unharvested areas and protection areas, let alone fire control, adaptive management etc etc.

1.2 Multiple uses of state forests is valuable

Multiple use is an important use that needs adequate consideration. This includes timber provision, honey production, grazing, fire wood, special events, bike riding and other activities.

Forests Corp web site has valuable information in relation to recreation facilities on its state forests and facilities include:

- Camping
- Walking track
- 4WD tracks
- Designated mountain bike track
- Designated horse-riding track
- Canoeing/kayaking
- Swimming
- Fishing
- Caravan site
- Picnic area
- Lookouts
- Adventure
- Authorised hunting.

One example of the importance of adaptive State Forest management as opposed to national park approaches in relation to tourism is provided in a 2015 article prepared by Nick Cameron titled "River Red Gum Forests in the Murray Valley-A look at Past and Current Management" pg. 13. The article notes the negative impacts on tourism from the removal of state forest management, refer the extracted information below:

In Mathoura, visitation levels have dropped 28% (32,000 in 2010 to 23,000 in 2014), the IGA supermarket, the bakery and a bed and breakfast have all closed, the pub is up for sale and the local footy club is struggling to find players. The Mathoura locals live in hope that one day the 2010 decision may be revisited and that forestry will again play a role in the management of the Murray Valley River Red Gum forests. I share their hope.

This again highlights the lack of logic and thinking. A stroke of a pen decision can destroy industries and communities, as well as the loss of adaptive management.

1.3 Healthy resilient and sustainable forests and adaptive management by Forest Corp is important

In many states including NSW, forest services are being destroyed and skills in many cases not utilised. Thinning of regrowth forests and mild fire is a good option to reduce bushfire risk. Expertise in thinning will soon be lost the way things are going. In addition, there has been a loss of bushfire skills over the last 30 years. I and many others have seen this. This applies with bushfires, backburning, prescribed burning and in some cases use of aircraft in prescribed burning.

There is generally a poor actioning in regards to forest health and the decline of forest health across Australia's forests, mild fire is an important component of improving forest health. Completed research work by a number of researchers clearly shows this. This includes research by Jurskis (2016): 'Dieback' (chronic decline) of *Eucalyptus viminalis* on the Monaro is not new, unique or difficult to explain"; Jurskis and Walmsley (2012) "Eucalypt ecosystems predisposed to chronic decline: estimated distribution in coastal New South Wales"; Jurskis (2005) "Eucalypt decline in Australia, and a general concept of tree decline and dieback"; Jurskis and Turner (2005) Eucalypt dieback in eastern Australia: a simple model; Turner et al (2008) "Long term accumulation of nitrogen in soils of dry mixed eucalypt forest in the absence of fire"; Turner and Lambert (2005) titled "Soil and nutrient processes related to eucalypt forest dieback" clearly highlights the research is there to be used, no more research is undertaken. Safe and healthy landscapes and chronic eucalypt decline has been missed as an issue.

However, Forests Corp is one agency that is addressing eucalypt decline, through harvesting and the use of mild fire

There is an inadequate awareness of the fuel load issue across forests and actual forest fuel loads in forests, at very high levels and increasing and inadequate action addressing the issue and reducing community, infrastructure and fauna impacts.

There is totally inadequate funding, focus and commitment for reducing fuel loads, undertaking prescribed burning, forest thinning and community protection. There is inadequate state funding for prescribed burning and minor federal funding to increase prescribed burning, noting areas of prescribed burning are very small and decreasing and communities are at risk.

The incidence of large wildfires in Western Australian forests over the last 67 years data unequivocally show that when the area of prescribed burning trends down, the area of uncontrolled bushfires (wildfires) trends up. The ideal area of forest burnt annually appears to be about 8 %.

1.4 Utilisation of adaptive management by Forest Corp is important

Information in relation to sustainable forestry is outlined in the document "Sustainable forestry continues to achieve positive outcomes International Day of Forests 2022 – "Forests and sustainable production and consumption" Monday, 21 March media release Friday, 18 March 2022, link below:

<https://www.forestry.org.au/media-release-sustainable-forestry-continues-to-achieve-positive-outcomes/>

If the panel want to understand the importance of adaptive State Forest management as opposed to national park approaches, a 2015 article prepared by Nick Cameron titled "River Red Gum Forests in the Murray Valley-A look at Past and Current Management" pg 11 onwards provides clear evidence of the importance of adaptive management as opposed to lock up and let it burn management.

1.5 US cohesive legislation provides a framework for Australia

The US cohesive legislation provides a framework for Australia and needs to be soundly considered before further lock up and let it burn management is undertaken:

The US Forest Service released the important document *Confronting the Wildfire Crisis A Strategy for Protecting Communities and Improving Resilience in America's Forests FS-1187a* (<https://www.fs.usda.gov/sites/default/files/Confronting-Wildfire-Crisis.pdf>) and associated documents in mid-January 2022.

In the US, there is key federal commitment in place for this work reducing fuel, increasing prescribed burning, improving forest health and expanding community mitigation work under the Bipartisan Infrastructure bill and other legislation,

Further detail is outlined in the document link:

<https://arr.news/2022/01/25/opportunities-for-improved-fire-management-in-australia-john-odonnell/>

1.6 Importance of the provision of bushfire expertise and equipment by Forest Corp

By any reduction in the heavy machinery and operator availability, needed for bushfire emergency response, this will increase exposure of local biodiversity, rural communities and economies to bigger and bigger and often intense bushfire disasters in future.

The real threats to forests and biodiversity once active forest management has been eliminated increases over time and are many. Fuel buildup is a critical issue, there is always some excuse re not undertaking regular mild burning.

By further reducing the heavy machinery and operator availability, needed for bushfire emergency response, state biodiversity, rural communities and economies are exposed to bigger and bigger disasters in future.

How has NSW considered the reduction of heavy machinery and operator availability, needed for bushfire emergency response, and protection of state biodiversity, rural communities and economies, so that they are not exposed to bigger and bigger disasters in future?

And the panel should be looking at how to increase a workforce with bush skills and knowledge to manage our forests and rangelands in a professional way, not tourism people nor lock it up and let it burn managers. For decades, the timber industry has provided an important sources of bush skills and expertise, often unrecognised by many.

1.7 Refute the harvesting and fire risk fufphy

The whole bushfire harvesting flammability issue is addressed and exposed by Vic Jurskis very well in *Bushfires and logging* debate: Vic Jurskis ARRN 2nd September 2021, refer below:

The whole debate about bushfires and logging is a fufphy. Thank you for drawing attention to a very serious problem with so-called scientific debate. The peer review system is not working. Both sides of this debate in the 'scientific' literature are wrong about the fundamental question of what causes megafires. Publication of their articles in apparently reputable scientific journals is a stark illustration of lack of critical review, and confirmation bias stemming from academic groupthink.

The professors on both sides of the logging debate failed to employ the scientific method. They did not construct and test hypotheses about the impacts of logging on fire intensities. They bypassed the first and second steps in science, observation and thinking. Anyone having any familiarity with fire knows that it should be a great friend rather than a dangerous enemy.

The professors all agree that drought and extreme weather caused the Black Summer megafires, without so much as observation and critical thinking, let alone testing of this demonstrably false hypothesis. We had worse droughts and weather for several years in succession 230 years ago. Fires were burning across the landscape all the time, but there were no disasters and no megafires.

Empirical data from the last 60 years of real-world experience, not models, in Western Australia, confirm about 40,000 years of traditional knowledge across our country. You have to treat at least 8% of the landscape each year to keep it safe. Unnatural fuels accumulate within 6 years without maintenance. Unless half the landscape has had recent maintenance, you'll have uncontrollable megafires in severe seasons.

Contrary to what the professors on both sides tell us, the real scientific data show that the beneficial effects of ecological maintenance by mild burning are most apparent in severe seasons. Hundreds of people have died, thousands have lost their homes and countless millions of animals have perished since the 2004 COAG report by two academics and a fire chief. The Black Summer Royal Commission endorsed that report which gave us emergency response and evacuation instead of sustainable land management.

*Forests across all tenures are declining and/or exploding from lack of sustainable management. A miniscule proportion is available for logging. **Logging can have a beneficial effect on local fire behaviour, but no effect on a regional scale. This debate is a dangerous distraction from our real major environmental issue – sustainable fire management. Proper ecological maintenance by frequent mild burning is actually illegal in New South Wales!***

Vic sums the issue up very well and the words in bold are the issues that need to be better managed by the state.

The South East Timber Association document "Logging and Bushfires, Is There a Connection?" also provides valuable information to debunk this issue re forestry.

Further information is provided by assessing the tenure burning information for the 2019/ 20 bushfires in the NSW State of Environment report.

Another huge issue is the bushfire regrowth (and dead timber) from intense bushfires across all tenures over the last 50 years. This is conveniently ignored, and there is a mass of regrowth and dead fuels and way denser than in the past understories, creating optimum conditions for the next set of intense bushfires.

Have the panel considered the world's biggest ever individual bushfire at Gospers Mountain, mainly in NPWS land? This is the result you will get when mild fire is restricted across landscapes and lock up and let it burn conservation management applies.

1.8 Note that native forestry is a regulated to beyond belief industry

Native forestry in NSW is highly regulated. Native forestry operations in NSW are among the most strictly regulated in the world. The state-owned Forestry Corporation NSW (FCNSW) manages State forests in accordance with Ecologically Sustainable Forest Management (ESFM) principles and is regulated by the NSW Environment Protection Authority.

Successive governments have ensured that public forests have been "protected" in National Parks and conservation reserves by lockup. The production forests managed by Forestry Corporation for multiple values have gradually reduced in size over the past thirty years but dramatically increased in regulatory controls. The native forest industry in NSW is already one of the most highly regulated in the world.

Yet the push is on to stop native forest logging on public land. I find this all very hard to fathom.

1.9 Regulatory creep, threatened species offset games in NSW and concerns in relation to native forestry

In NSW there has been recent activity to add Koalas and 34 other threatened species to the Biodiversity Offsets Scheme and there are broader biodiversity failures of the current and proposed approaches. I made a 11 page submission to the Premier dated John O'Donnell 26 July 2024.

Refer Annexure A for more information in relation to this matter.

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

This issue is addressed below, under bolded headings.

I have responded to forests broadly here, as noted in the Topic.

2.1 NSW State Forests are well managed (but NSW fire management needs actioning, refer below)

NSW forests host numerous threatened species, including the koala, which is supported by current forest management techniques. Planned and supervised selective harvesting ensures minimal impact on koala populations, and forests are managed to protect critical habitats like riparian zones, rainforest and old-growth forests.

2.2 Koala science and forestry, a good news story for forestry

There is ongoing inadequate science trying in NSW in relation to forestry and koala numbers. However, work by Vic Jurskis exposes this. He addresses the ongoing misuse of koala number data/ exclusion of relevant information in NSW to achieve koala parks, lock up and party aims/ agreements in the recent article linked below, teased out here for brevity sake:

<https://arr.news/2024/04/24/nsw-koala-strategy-extinguish-native-forestry/>

I have teased these out and numbered them.

Number 1. *By 1991, field surveys established that there were three times as many koalas in young regrowth and plantations on the north coast, as there were in old growth forests. Nevertheless, in 1992, NSW listed koalas as a species vulnerable to extinction. In 1995, regrowth forests and plantations were locked up in Bongil Bongil National Park to 'protect' koalas.*

By that time, increasing 'protection' of forests from maintenance by mild burning was affecting forest health. Both young and old forests were beginning to suffer and constantly turn over soft young shoots. Koalas were increasing throughout the forests. But NPWS continued to rely on ineffective and subjectively targeted surveys to promote their story of declining numbers and pursue their land use objectives.

Number 2. *Meanwhile, NSW Department of Primary Industries (DPI) published scientific research utilising effective survey technology and showing that koala numbers were five times higher than previously thought on the north coast and were not affected in any way by logging.*

"Neither occupancy nor bellow rate are influenced by timber harvesting intensity, time since harvesting or local and scape extent of harvesting or old growth."

(Passive acoustics and sound recognition provide new insight on status and resilience of an iconic endangered marsupial(koala Phascolarctos cinereus) to timber harvesting, Bradley S Law et al, PLOS One, 31 October 2018)

Number 3. *In May 2022, NSW DPI and Natural Resources Commission (NRC) quietly released a report stating that koala numbers on the north coast had remained stable for the previous five years despite the Black Summer holocaust. More precise data published in three separate scientific papers showed that numbers actually continued to increase. But NRC and DPI combined them with less precise data over a wider region, masking the ongoing increases in coastal regrowth forests.*

Number 4. *It is an historical fact that koalas irrupted after European settlement and did not reach millions until a century later. The AKF has stated that numbers crashed as a result of hunting for the fur trade. In fact, koalas numbers continued to increase as they were hunted because survival of juveniles increased as mortality of adults allowed them to obtain food.*

Unsustainably high numbers of koalas crashed during the Federation Drought whilst koalas in naturally low densities were unaffected. Koala numbers have not been reduced anywhere at any time by logging or climate change.

Number 5. *New data from field surveys of 1000 sites, trumpeted by the incoming Environment Minister and commenced a year ago, will not be released in time to stimulate or inform public submissions on the Koala Strategy. The closing date is on Friday after Anzac Day. The result is preordained.*

Vic also notes:

On the Government's first anniversary, they held the Koala Summit behind closed doors. It was billed as a "a key consultation point [to] hear from a diverse range of stakeholders and inform the government's work". AAP reported that "A new road map for the forestry industry is underway in NSW amid deep disquiet about the harm it's doing to endangered koalas. Environment Minister Penny Sharpe flagged the new forestry plan at a major summit focused on saving the species from extinction in NSW".

(New forestry plan seeks to avoid koala free future, Canberra Times, 22 March 2024)

Vic's information all highlights the approaches being used promoting inadequate science at the expense of native forestry.

There has been other koala science research that highlights the inadequate science that has been used in relation to koalas and forestry.

Law et al (2022) provide additional information in a paper titled "Regulated timber harvesting does not reduce koala density in north-east forests of New South Wales, no further explanation required:

We used a BACIPS design to assess change in koala density after selective harvesting with regulations to protect environmental values. We also assessed additional sites heavily harvested 5–10 years previously, now dominated by young regeneration. We used replicate arrays of acoustic sensors and spatial count modelling of male bellowing to estimate male koala density over 3600 ha. Paired sites in nearby National Parks served as controls. Naïve occupancy was close to 100% before and after harvesting, indicating koalas were widespread across all arrays. Average density was higher than expected for forests in NSW, varying between arrays from 0.03–0.08 males ha⁻¹. There was no significant effect of selective harvesting on density and little change evident between years. Density 5–10 years after previous heavy harvesting was equivalent to controls, with one harvested array supporting the second highest density in the study. Within arrays, density was similar between areas mapped as selectively harvested or excluded from harvest. Density was also high in young regeneration 5–10 years after heavy harvesting. We conclude that native forestry regulations provided sufficient habitat for koalas to maintain their density, both immediately after selective harvesting and 5–10 years after heavy harvesting

Other information is provided in Kavanagh. As noted in Kavanagh, R. P., Debus, S., Tweedie, T., and Webster, R. (1995). Distribution of nocturnal forest birds and mammals in north-eastern New South Wales: relationships with environmental variables and management history. *Wildlife Research* **22**, 359–377. doi:10.1071/WR9950359

The koala was strongly associated with logged forests. Koalas were frequently recorded in Eucalypt plantations and other forests with a long history of logging.

As noted in Kavanagh, R. P., Debus, S., Tweedie, T., and Webster, R. (1995). Distribution of nocturnal forest birds and mammals in north-eastern New South Wales: relationships with environmental variables and management history. *Wildlife Research* **22**, 359–377. doi:10.1071/WR9950359

The koala was strongly associated with logged forests. Koalas were frequently recorded in Eucalypt plantations and other forests with a long history of logging.

It is my opinion that most of this information is conveniently ignored in most koala conservation assessments, basically because it contradicts and doesn't assist arguments re alleged decline of koalas and the green pushes for koala parks.

2.3 Other koala science furrphies

The truth about rapidly declining koala populations needs to be corrected from science/ scientists that haven't been listened to:

Jurskis (2017) Ecological history of the koala and implications for management

Jurskis V (2017) *Wildlife Research* CSIRO Publishing CSIRCSIO Publishing <https://doi.org/10.1071/WR17032>
<https://www.publish.csiro.au/wr/wr17032>

Abstract. Assessments of the conservation status of koalas and trends in their population have been based on mostly unstated false assumptions about their pre-European status and on notions that either they were naturally regulated by their predators, chiefly Aborigines and dingoes, or that they somehow 'self-regulated' their fecundity. Closer examination of their ecological history suggests that frequent mild burning by Aborigines maintained eucalypt forests having fewer, mostly healthy trees, fewer young trees, canopies comprising mostly hard and dry leaves with low nutrient content, and, consequently, very few koalas. European explorers did not see them because they were solitary animals occupying large home ranges. After burning was disrupted, koalas responded to increased food resources in dense new growth of eucalypts and in stressed trees continually turning over new foliage. An export skin industry flourished. When their food resources were depleted by clearing or ringbarking of new growth and/or death of declining stands during droughts, koalas crashed back to low levels. Koalas continue to irrupt and decline through much of their range according to changing land management. Wildlife managers should re-assess their status and their management from a clear historical and ecological perspective.

The paper includes a mass of detail in relation to the ecological history of koalas, including:

- Status of koalas at the time of European settlement; and
- Koala irruptions and declines.

Conclusions

Ecologists should recognise that stable populations of koalas are virtually invisible, and that visible populations are usually unstable, a sign of ecological imbalance. The koala's ecological history indicates that managers should re-instate frequent mild burning, grazing or slashing to conserve healthy natural eucalypt ecosystems with very low, but sustainable, densities of koalas. Higher densities could be sustained in well managed plantations or regrowth forests with healthy young trees.

It is my opinion that most of this information by Vic is conveniently ignored in most koala conservation assessments, basically because it contradicts and doesn't assist arguments re alleged decline of koalas and the green pushes for koala parks.

2.4 Forestry land sharing enhancement, Venn report findings

The Venn (2023) report finding 7:

7. conservation of the majority of native flora and fauna in QLD is not substantially affected or is enhanced by land sharing, while land sparing can benefit a comparatively small group of species that require long undisturbed forests

2.5 NSW bushfire management failures across NSW due to inadequate government policies

I can live with this, but I note that there are many studies that highlight the promotion of biodiversity through forestry harvesting mild fire and disturbance.

The real threats to forests and biodiversity once active forest management have been eliminated increases over time and are many. Fuel buildup is a critical issue, there is always some excuse re not undertaking regular mild burning.

The biggest threats to biodiversity in my opinion are:

- Intense bushfires as in 2019/ 20 and following dead trees and consequent very thick regrowth;
- Lack of prescribed burning and mild fire across landscapes;
- High fuel loads;
- Extensive and increasing eucalypt decline due to lack of mild fire and forests that are not resilient;
- Increasing forest understories and upside down forests, thick below and thin on top;
- Cats and dogs increasing; and
- Weeds.

I ask myself where has the NSW Government been in reducing the impacts of all these major biodiversity threat issues identified and why state forests have been targeted?

2.6 Poor conservation land management outside of state forests case study 1

SETA Submission to the Eurobodalla Shire Council Regarding the Motion to End Native Forest Harvesting to be put to Council on 9 August 2022:

Aside from an alleged increased risk of bushfires, activists argue that stopping native forest harvesting will protect various species, including koalas from extinction. At 20 June 2021, 7,590,000 hectares of available public land (80.83%) was in the NSW conservation reserve system. There was 1.8 million hectares of native forest in state forests. We are to expected to accept without question that permanent protection that flows from cessation of harvesting will ensure species survival in the long term.

The NSW NP&WS Zero Extinctions Report September 2021 notes: "There is evidence that the overall decline in biodiversity in NSW is occurring even in the national park estate. Key threats affecting threatened species populations in national parks include feral predators and other feral animals; invasive weeds; changed fire regimes; and a range of impacts associated with climate change. On park declines are occurring, or have occurred, in a range of threatened species including small- to medium-sized mammals, woodland birds, koalas and gliders, frogs and a range of plant species."

While native forest harvesting has been demonised as the threat to biodiversity by anti-native forest activists for over 30 years, it is becoming increasingly clear that poor land, including lack of fire mitigation and other threat management must be addressed.

Surveys by the NP&WS showed koala occupancy in the Murrah SF was double and that in Mumbulla SF was triple, the occupancy of that in the adjoining Biamanga NP. Over 70 percent of the koala occupancy was in regrowth stands following integrated harvesting. Despite these results, in 2016, the NSW environment minister announced that koalas in the Murrah and Mumbulla state forests would be protected in a new flora reserve.

Other examples that show dedication of new parks or cessation harvesting do not guarantee biodiversity protection include:

Southern Brown Bandicoot (Isodon obesulus obesulus)

The following extract is from the 5 May 2016 Threatened Species Scientific Committee advice to the Minister.

Available quantitative data are summarised in the table below.

Population	State	Decline
Ben Boyd National Park	NSW	44% (1999 to 2008)
Nadgee Nature Reserve	NSW	47% (1999 to 2008)
Port Campbell	Vic	>70% (past 10 years)
Pines Flora and Fauna Reserve	Vic	100% (extirpated around 2006)
Mt Lofty Ranges – northern metapopulation	SA	100% (extirpated around 2009)

Following assessment of the information, the Committee considers that the southern brown bandicoot (eastern) is continuing to decline across its range. Existing habitat fragmentation exacerbates threats continuing to operate over much of its range, particularly predation by foxes and feral cats, too frequent and extensive burning, and further habitat clearing and fragmentation. All of the available quantitative estimates for recent population trends exceed or approach a 50 percent reduction in numbers over a recent 10 year period (see table above). For

2.7 Poor conservation land management outside of state forests case study 2

Another valuable source of information is outlined by Robert Onfray is his excellent detailed review “Proof that species are declining in our reserves set up to protect them” on 2 May 2023. This further outlines the failures of lock up management on biodiversity.

The paper highlights the biodiversity impacts of the 2019/20 bushfires on biodiversity in the Greater Blue Mountains World heritage area. That is what happens with inadequate land and fire management. Has Council considered the world’s biggest ever individual bushfire at Gospers Mountain, mainly in NPWS land? This is the result you will get when mild fire is restricted across landscapes and lock up and intense bushfires management applies, something the NSW Government hasn’t considered at all in this plan only looking at forestry.

As noted in Sustainable forestry is part of the solution to Australia’s environmental crisis Australian Forest Products Association 19 July 2022:

“Studies have also shown that timber harvesting has not been a ‘major threat factor’ in the extinction of any Australian mammal since European settlement.”

I suggest that biodiversity, based on the above, is well looked after in Forest Corp lands and is failing in conservation areas.

3 Demand for timber products, particularly as relates to NSW housing, construction, mining, transport and retail
Durable hardwood timbers, used in utility poles, marine piles, and high-quality housing products, is a significant resource in NSW. There are a range of other timber products. A reduction in native forestry operations would heavily impact the availability of hardwood timber, essential for infrastructure, transport and mining.

There is also other non-timber forest uses such as recreation, cattle grazing, apiculture and others.

I am somewhat suspicious of the topic question; the information is out there and readily obtainable. I am sure there will be further information provided in relation to this topic.

The maintenance of regional economies is a really important issue, not considered at all by the panel.

An important question is where will the replacement wood come from if native forestry was further reduced?

The way things are going, Australia is going to be importing a hell of a lot of hardwood and other timbers.

As the NSW and Australian hardwood supplies have declined, imports fill the gap in supply. While there are ongoing multimillion campaigns decrying the environmental impacts of native forest harvesting in Australia, little attention is paid to the environmental impacts of harvesting in less regulated countries and issues such as transport costs, sovereign risks, timber need, loss of adaptive management etc etc.

In many developing countries, forest restoration at home has led to deforestation abroad, according to a 2010 study in the *Proceedings of the National Academy of Sciences* (PNAS).

It is my view that the deliberate proposed transfer of the impacts of our hardwood consumption offshore is selfish, unethical and immoral and displays a silo attitude.

As noted by Joel Fitzgibbon in an opinion piece – originally published in the Australian Financial Review Australian Forest Products Association. Careful harvesting of native forests is the key to carbon capture 15 August 2023:

Australia's wood and timber imports are now valued at more than \$5 billion a year. About 25 per cent of the timber we require for housing construction is imported. Sourcing that product from other countries is going to become harder as global demand continues to outstrip supply. And, of course, much of our imported product is likely to come from jurisdictions that do not have Australia's environmental standards and world's-best industry practice. Having called time on local native harvesting, Victoria is now importing native product from Tasmania, Brazil, Indonesia and Malaysia. Unfortunately, Western Australia has also joined in.

Joel also notes:

There is no rational reason to shut down native forestry – and a big bonus in carbon sequestration. Global demand for wood products is forecast to dramatically outpace supply as urban populations grow and renewable wood and innovative wood products play a greater role in our decarbonisation and circular bioeconomy efforts.

A question. Has NSW thought through the impacts of any anti native forestry decision in relation to sovereign risk, included timber needed in any future war periods and the processing of this timber in local areas?

Other important questions in relation to timber supplies if native forestry is stopped:

1. Where would bridge girders, poles, firewood and other wood needs be sourced from?
2. How would NSW manage this?

4 [The future of softwood and hardwood plantations and the continuation of Private Native](#)

This issue is addressed below, including reform areas for additional plantations and opportunity areas for additional plantations.

In relation to additional plantations, there are a number of reform areas that need urgent actioning:

- The 1 billion trees plantation program not going anyway fast, is crucial to our future, regional development, regional employment, value adding, reduction in imports and need to kick this along;
- I understand that the requirements of the National Forest Industries Plan are not being met in NSW, which was launched in 2018 to support the forest industries to: meet the challenges of the future underpin growth in the renewable timber and wood-fibre industries innovate and use our forest resources smarter assist industry to realise its ambition to plant a billion new plantation trees during the decade to 2030. The plan reinforced the Australian Government's commitment to securing a strong, sustainable forestry industry;
- There is inadequate plantation/ other timber supply as has happened over the last number of years, with big impacts on building and construction;
- There are lost opportunities for regional industry development and for regional employment;
- The importance of plantation forestry isn't adequately recognised as a critical industry that can take Australia forward;
- Plantation forestry isn't adequately protected from bushfires, putting long term assets at risk e.g. 2019/ 20 bushfires. There is inadequate bushfire protection across landscapes to protect plantations, communities and other assets;
- There are legislation, policies and processes that may unintentionally restrict plantation expansion;
- There are increasing imports of timber; and
- There are huge replanting efforts that occur that after bushfires, an important component of state ownership helps this replanting process.

There are many opportunity areas in relation to expanded plantation programs:

- Address the barriers to the expanded 1 billion trees plantation program. Reviewing other legislation, policies and processes that may be unintentionally restricting plantation expansion;
- Consider expansion of plantations higher than current proposed targets;
- Adequately recognise the importance of plantation forestry as an additional Growth Industry sector due to its importance in relation to productivity, competitiveness, regional development, employment, increased export/ reduced import, value adding and in meeting net zero and timber supply constraints;
- Address plantation supply constraints;

- Recognise the value adding opportunities of plantation timber products in Australia before export, hopefully over the broad range of timber products;
- Incorporate the extensive greenhouse gas capture benefits from plantations into all policy considerations, hopefully this will expand the rate of plantation expansion. Utilise the economic and environmental advantages of lower embodied and operational emissions in timber buildings;
- Optimise regional development and employment;
- Address innovative federal policies, incentives, state grants, federal bushfire funding and optimise bushfire protection of timber plantations and other assets;
- Ensure that plantation forestry areas are adequately protected from bushfires and is classed as critical infrastructure;
- Ensure the importance of plantation forestry is adequately recognised, and it is recommended that it be an additional Growth Industry sector due to its important in meeting net zero and timber supply constraints;
- Undertake workshops and working groups including plantation growers, industry, industry groups, federal and state governments to explore all plantation opportunity areas. Then teasing out the key actions for actioning. It would be beneficial if this process takes into account trade issues, incentives, cross border opportunities and the current supply constraints review. The process could be similar to the successful Bob Hawke's government wage reform approach, getting key parties together;
- Explore incentives and tax opportunities to optimise new timber industry investment;
- Develop new investment drivers for plantations and farm forestry;
- Continue support for the timber industry through regional forestry hubs. Work with industry and state governments to allow regional forestry hubs to maximise their capacity to accommodate plantation expansion in the right places;
- Work with industry to help farmers explore opportunities for: expanding farm forestry creating future wood and fibre supplies, improving linkages with the forestry industries, increasing economic returns for farmers. Work with state/territory governments, private native forest owners and interested Indigenous communities to unlock potential timber supply, and to deliver economic returns to landowners;
- Undertake further review of the water requirements in the Emissions Reduction Fund (ERF) farm forestry and plantation methodologies to enable forestry to fully participate in the ERF;
- Review other legislation, policies and processes that may be unintentionally restricting plantation expansion;
- Develop additional research centres of the National Institute for Forest Products Innovation (NIFPI), in partnership with industry. Work with Forest and Wood Products Australia to support ongoing research, development and extension activities associated with the forestry industries;
- Work with Austrade to increase and diversify timber markets and products from tree plantations across Australia, including export and value added export. Work with the Business Council of Australia to increase and diversify timber markets and products from tree plantations across Australia, noting the importance of the plantation timber industry in capturing greenhouse gases, regional development and regional development. Work with the Department of Industry, Innovation and Science Industry Growth Centres Initiative to increase and diversify timber markets and products from tree plantations across Australia, increasing innovation, productivity and opportunities for the plantation timber industry;
- Consider potential opportunities to appoint forestry market and product development specialists within Australia and for export;
- Increase science opportunities in reuse of timber plantation material after major bushfires, including increasing the life of stored/ salvaged timber, innovative timber treatment options to increase life/ reduce blue stain and increasing the range of potential timber products;
- Complete the National Forest Industries Plan to secure a strong, sustainable forestry industry;
- Continued support for the timber industry of regional forestry hubs. Working with industry and state governments to allow regional forestry hubs to maximise their capacity to accommodate plantation expansion in the right places; and
- Working with industry to help farmers explore opportunities for: expanding farm forestry creating future wood and fibre supplies, improving linkages with the forestry industries, increasing economic returns for farmers. Working with state/territory governments, private native forest owners and interested Indigenous communities to unlock potential timber supply, and to deliver economic returns to landowners.

I understand that the Victorian Forestry Plan was created to transition the native forest industry to a range of new opportunities by 2030, moving towards plantation based supply. But there was extremely little suitable hardwood plantation wood available in Victoria, I am advised currently 5300 m³/ year. This approach paints a dismal picture in Victoria for sawmilling and country towns.

The same situation applies in NSW, there is little native hardwood plantation timber available, so why even think about transitioning out of native forestry harvesting.

Private Native Forestry (PNF) has a critical role and is crucial for meeting hardwood timber demand but cannot replace public native forests. Private native forest management is following the trajectory of State Forests – more

restrictions and higher cost impositions. Much comes from government and it is totally unjustified and part of the green aim to close the industry.

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

This issue is addressed below.

State forests and timber industries have a critical role are a major employer in regional areas, providing stability to local economies.

5.1 Environmental

State Forests have a critical role in relation to:

- State Forests have a critical role in provision of products and multiple use, as outlined in this document;
- State Forests have a critical role in provision of timber for regionally based industry, employment and reduction of imports, as outlined in this document;
- State Forests have a critical role in provision of adaptive management, as outlined in this document;
- State Forests have a critical role in provision of fire and bushfire management, as outlined in this document; and
- State Forests have a critical role in provision of timber for regionally based industry, employment and reduction of imports, as outlined in this document.

Native forestry research and management expertise is critical across the state and loss of native forestry would further decimate this expertise. I have seen this research dwindle over the years, this is extremely disappointing to me, and a massive loss to the state.

Refer to research by Turner, Lambert, Jurskis and many other researchers across NSW.

Meanwhile, in the US, they have tremendous research on native forests under the Forest Service.

Why would NSW/ this country proceed this way in regards loss of research expertise, based on logic and all the facts in this submission and available information?

It is important to note that there are serious failures of conservation management in NSW on NPWS lands. With over 80 percent of threatened species in NSW being in supposedly permanently protected parks and reserves system, the biggest threats to all biodiversity. are high intensity bushfires and management by neglect. Use of mild fire across landscapes is critical, as the Aboriginal people used to do.

As noted on the Environment and Heritage website dated 17 July 2024:

We manage fire in NSW national parks to protect life and property, and to conserve biodiversity and cultural heritage.

and Managing fire

We work to reduce the risk of bushfire in national parks through careful planning and hazard reduction activities.

I believe that this information is not correct, there is minimal protection of life, property, communities and the environment from bushfires.

The failures of the conservation approaches over 40 plus years is there for all to see.

5.2 Economic

This is outlined further below in detail.

5.2.1 The Minister highlights the importance of the provision of timber resources and optimising regional native timber manufacturing and employment

Forestry Media Release News NSW State Politics Timber by Contributor, ARR.News 26 August 2024

The Hon. Penny Sharpe, Minister for the Environment (NSW), The Hon. Tara Moriarty, Minister for Regional NSW, Joint Media Release, 26 August 2024

Minister for Regional NSW Tara Moriarty said:

"We need both trees and wood, and we must strike the right balance for communities and our environment tin regional NSW.

“Timber is a crucial part of our everyday lives, with timber needed for community and government priorities such as housing, transport infrastructure, electricity distribution, and freight transport.

“The families, businesses and communities that make up this industry will be considered for the Action Plan. Their knowledge and experience will be essential for understanding the issues and finding the solutions.

*“Our timber workers also play a crucial role, when we need it most, to protect our forests and our communities during **bushfires**. They are part of our frontline in those difficult times, where their skills and equipment are critical in the fight.*

“The consultative work that is set to go into this Action Plan will ensure all stakeholders are listened to and we arrive at the best future for the timber industry and sustainable state forests.”

In relation to “The families, businesses and communities that make up this industry will be considered for the Action Plan. Their knowledge and experience will be essential for understanding the issues and finding the solutions”.

It is staggering beyond belief that the families, businesses and communities that make up this industry are not a listed topic considered for the Action Plan.

5.2.2 The essential importance of the State Forests, the timber industry and case studies where poor policy prevailed

In relation to manufacturing, I provide an industry case studies on poor policies reducing regional employment.

A case study is outlined in Timberbiz Friday analysis: Vic Labor, activists – votes & purported virtue is more important than environmental and humanitarian outcomes John Cameron 7 July 2023

The bottom line, he wrote, was that many timber workers will be forced to sell their homes at a discounted price into an oversupplied local market and move to get employment, disrupting family and community connections. Some will move to Melbourne putting pressure on Melbourne’s scarce housing and congested infrastructure. Others will be forced take fly-in fly-out jobs with adverse family consequences. Others will undertake the government retraining and still struggle to find a job.

There are already so many sad stories coming out of towns like Orbost.

Then John nails it: Many community organisations that are the lifeblood and fabric of rural society will fold (e.g. service clubs, sporting clubs etc.).

Schools will close because of declining pupils and many towns will struggle to attract the doctors, health workers etc required.

The Government decision is a disaster for rural and regional development, Gippsland forests, global sustainability, human rights and world peace.

And he points out that, whether by design or accident, it is good news for Chinese exporters of wood products processed with coal fired power. It is also good news for Russian exporters of logs (conflict timber). That’s a theme new Forest & Wood Communities Australia executive officer Michael Harrington has picked up on.

He points out that every time we use Australian sustainable native timber, we are also choosing not to support catastrophic illegal logging overseas. According to Interpol illegal logging contributes between 15% and 30% of the world wood trade every year and is believed by United Nations experts to range from US\$30 to US\$100 Billion a year.

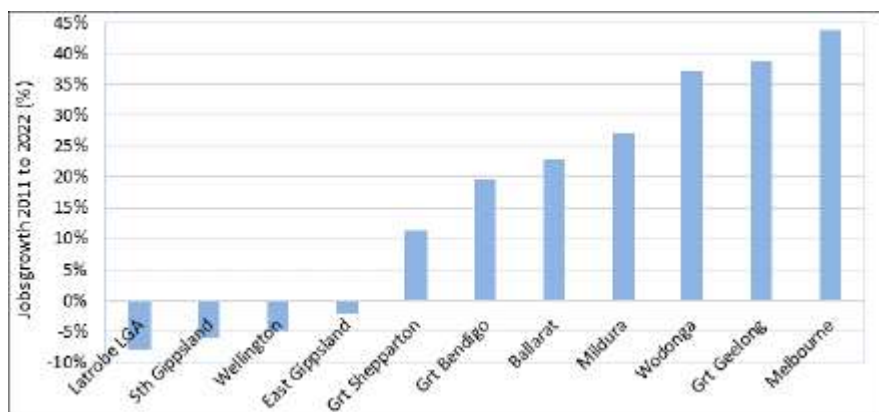
The United Nations Environment Program (UNEP) believes illegal logging directly contributes to funding many criminal groups, including African terrorist groups like Al-Shabaab and Boko Haram.

He says that the choice is very clear when it comes to hardwood timber supply– we must choose a well-regulated sustainable industry here in Australia – with the rigorous oversights that a stable democracy and ingrained institutions afford, with the added benefit of sustaining our communities and enabling home grown manufacturing success stories.

Another case study is provided by John Cameron Timberbiz Transitional assistance fails in Victoria 5 July 2023

Industry closures in the Latrobe Valley and surrounding areas of Gippsland have increased and transitional arrangements promised by the Andrews Government have failed. Job numbers have decreased despite the Andrews government spending a huge amount of your taxes in a futile attempt to create more jobs. Source: John Cameron

In Latrobe, South Gippsland, Wellington and East Gippsland LGA's the number of jobs shrunk, and by up to 8% for Latrobe LGA over the last eleven years. By contrast other regional and rural areas of Greater Shepparton, Greater Bendigo, Ballarat, Mildura and Wodonga experienced job growth of 11% to 37%. Greater Geelong recorded growth of 39% and Melbourne LGA 44% .



The Latrobe Valley Authority (LVA) claims to have created 4,000 additional jobs. The job losses in Latrobe and surrounding LGAs indicate this claim by the LVA is not supported by the facts.

Gippsland and the Latrobe Valley are being cruelled by the Andrews Government's hasty launch of reckless policies. Policies are rolled out with appalling timing and without a good strategy, sufficient feasibility studies and appropriate consultation.

Gippsland and the Latrobe Valley are being cruelled by the Andrews Government's hasty launch of reckless policies. Policies are rolled out with appalling timing and without a good strategy, sufficient feasibility studies and appropriate consultation.

For example, closing power stations well in advance of the commissioning of replacement renewable power sources, and well in advance of resolving issues with transmission lines, and well in advance of the setting up of domestic manufacturing of components for renewables, and well in advance of setting up environmentally safe recycling of spent components.

Now the Andrews Government has announced the closure of the native forests prior to even starting on the establishment of the plantations that are supposed to replace the 1.0 million cubic metres traditionally harvested from native forests.

Then the Government only promise 14,000 hectares when 50,000 hectares is required to replace the native log supply and another 50,000 hectares is required to replace the shrinkage of the Victorian plantation estate over the last six years (under the Andrews Governments failed plantation policy).

There is a lot more information in this case study.

Other useful information is contained in:

1. Tasmanian Premier Slams Ill-Conceived Vic Native Forest Ban | Wood Central dated 24 July 2023.
2. Victorian native forest logging cessation worries border communities | About Regional 21 June 2023. "The recent announcement by the Victorian Government that nature forest logging would cease by 1 January 2024 has concerned not only Victorian communities, but also neighbours on the NSW side of the border".

5.2.3 Regional native timber and manufacturing employment in the Clarence

Clarence Valley Regional Economic Development Strategy 2018 -2022 vision:

To sustainably grow Clarence Valley's prosperous, diverse economy specialising in **tourism**, agriculture, aquaculture, **forestry**, **manufacturing** and **services**.

In relation to this growing a diverse economy, forestry covers of four (likely 5) of these sustainability growth sectors:

- Tourism, considerable activities in relation to recreation;
- Agriculture, some grazing occurs on State Forests, honey production;
- Forestry;

- Manufacturing; and
- Services, for timber manufacturing, recreation, research expertise and government staff at Trenayr, and multiplier employment, including shops.

I have major concerns in regards to sound security for regional employment in the Clarence alone, with up to 1000 employees and people reliant on the timber industry if wrong decisions are made:

- Job numbers will decrease considerably in the CVC area;
- Many timber workers will be forced to sell their homes at a discounted price into an oversupplied local market and move to get employment, disrupting family and community connections;
- Others will undertake the government retraining and still struggle to find a job. There are already so many sad stories coming out of towns like Orbost in Victoria;
- Rural and regional development will decrease;
- Every time we don't use Australian sustainable native timber, we are also choosing to support catastrophic often illegal logging overseas. According to Interpol Illegal logging contributes between 15% and 30% of the world wood trade every year and is believed by United Nations experts to range from US\$30 to US\$100 Billion a year; and
- It provides good news for Chinese exporters of wood products processed with coal fired power.

I have serious economic and welfare concerns as a concerned citizen, rate payer and NSW citizen in regards to any impacts of the native timber industry, including:

- Huge impacts on individual employees and business people in the native timber industry;
- The plantation resource base just isn't there and the NSW Government know this;
- Impacts of such a planned native timber closure on the native timber plantation industry, who will be left to harvest trees and would any timber business take a risk with government support;
- Many people will decide to move on if rates get higher or a level that they can't afford;
- Loss of harvesting machinery and expertise to fight bushfires, this is absolutely true and conveniently ignored;
- With the loss of timber businesses and employment, that the already high rates in the CVC area will go up, noting many employees will leave when businesses close and less people will have to pay the rates;
- Greater lock up and intense bushfires in expanded conservation areas and economic consequences of disastrous bushfires; and
- The increased tourism data furphy, the tourism employment is not that great and removal of timber harvesting from state forest areas wouldn't greatly change tourism employment. This has been a technique used in the past to close down/ reduce timber harvesting, when the timber jobs disappear, there gone.

These are serious issues that need to be adequately considered by the NSW Government.

5.2.4 Provision of a diversified state economy

I believe the state economy will become less diversified if native forest activities are reduced.

I respectfully ask if it is a sensible approach to reduce diversification of its industry base? I personally don't think so.

5.2.5 Optimisation of investment in NSW

Considering the potential reduction/ closure of native forestry by the NSW Government, I suggest that this doesn't provide much encouragement for further investment by the current native timber industry.

I suggest that the same could apply for future plantation investment, the signals that NSW are sending aren't good for investors.

5.2.6 Provision of harvesting, production, adaptive management and bushfire fighting expertise and resources

Expertise in thinning will soon be lost the way things are going. There has been a loss of bushfire skills over the last 30 years. I and many others have seen this. This applies with bushfires, backburning, prescribed burning and in some cases use of aircraft in prescribed burning.

To restore forest health and reduce wildfire risk, a considerable and able workforce with expertise in proactive fuels and forest health management is needed for thinning forests, conducting prescribed fires, and using lightning fires and other "unplanned ignitions" to return fire to the land and restore forest health.

Loss of harvesting machinery and expertise to fight bushfires, this is absolutely true and conveniently ignored in the motion. By further reducing the heavy machinery and operator availability, needed for bushfire emergency response, biodiversity, rural communities and economies are exposed to bigger and bigger disasters in future.

The real threats to forests and biodiversity once active forest management have been eliminated increases over time and are many. Fuel buildup is a critical issue, there is always some excuse re not undertaking regular mild burning.

I suggest that the state should be looking at/ assisting in how to increase a workforce with bush skills and knowledge to manage our forests and rangelands in a professional way, not lock it up and let it burn approaches and supporters. For decades, the timber industry has provided an important source of bush skills and expertise, apparently totally unrecognised in the motion/ possibly by Council.

5.2.7 Land sharing provides value for money

The Venn (2023) report findings re the benefits of land sharing back up the points supporting the timber industry and points made in my submission:

This paper also presented the first comprehensive review of the ecological and economic trade-offs between land sharing and sparing in QLD, finding that:

- 1. land sparing policies enacted by Australian states since the 1980s have coincided with a rapidly growing international ecological footprint of Australian consumers in forests of developing countries;*
- 2. land sharing is likely to provide greater long-term climate risk mitigation benefits in QLD than land sparing coupled with substitution of domestic wood products for non-wood products and imported timbers;*
- 3. land sharing can overcome many of the economic impediments to satisfying domestic timber demand through land sparing with timber plantations;*
- 4. inadequate operational funding for conservation area management means increased land sparing is unlikely to effectively conserve and recover many threatened species;*
- 5. there is no evidence that land sharing increases wildfire risk in QLD;*
- 6. land sharing can mobilise private sector resources for domestic conservation and wildfire management activities;*
- 7. conservation of the majority of native flora and fauna in QLD is not substantially affected or is enhanced by land sharing, while land sparing can benefit a comparatively small group of species that require long undisturbed forests; and*
- 8. a mix of land sharing and land sparing (the triad policy B in Fig. 1) shows greatest promise to conserve the full suite of biodiversity in QLD by producing diverse ecological and structural conditions over space and time.*

I strongly believe Venn (2023) has summarised the situation well in regards to the importance of land sharing and not all land sparing and the same points apply to NSW and Northern NSW.

I respectfully suggest that the NSW panel consider all submission points from the timber industry (and are provided access to all information).

5.2.8 Inadequacy of current native timber plantation timber resources to support local industry

As noted by Joel Fitzgibbon in an opinion piece – originally published in the Australian Financial Review 15/8/23 here. Careful harvesting of native forests is the key to carbon capture Australian Forest Products Association 15 August 2023:

On the sovereign capability front, the activists claim we can offset the loss of native product by expanding the plantation estate. That is misleading on four fronts.

First, the plantation estate is only 2 million hectares. For perspective, Australia has 132 million hectares of native forest, 5 million of which is available and suitable for commercial wood production.

Second, hardwood trees take 30 to 50 years to grow. The third point flows from the second – given the time frames, there is a range of consumables which can only be made from native trees.

Finally, the plantation estate is shrinking, not growing. The sector is thankful for a number of Albanese government initiatives designed to arrest that decline, and innovation will allow the increasingly sophisticated forestry sector to do more things with plantation trees over time.

I respectfully suggest that the panel consider these matters carefully.

5.2.9 State Forests are a much lower cost alternative than NPWS

I have serious economic and welfare concerns as a rate payer in regards to the impacts of the proposed plan. I have seen figures bandied about that the cost of managing forests is under \$20/ha/year in State Forests whilst around \$80/ha/year in National Parks. I ask why should the taxpayer be financially penalised when State Forest is converted to National Park, with poorer environmental outcomes as well?

I ask that the panel check this, without all the economic clap trap and anti forestry calculations that goes with green assessments trying to close the native timber industry.

5.2.10 Avoids silo management

I believe NSW is considering and progressing a silo approach, where all state forests are proposed to be locked up from any timber harvesting or adaptive management. A lot of timber will need to be imported, much from rainforest counties and likely some from other areas of Australia.

What is the point of this when we have an active industry on a very small area of forest each year, that is sustainable.

I believe the approach is a targeted approach against the timber industry. It seems illogical to me that forestry occurs every 30 years or so and agriculture occurs on an ongoing basis, yet forestry is the area again repeatedly targeted.

And never poorly managed NPWS conservation land under lock it up and let it burn management

5.3 Social

Multiple use of state forest land is an important social issue and benefit. This includes timber provision, firewood, honey production, grazing, fire wood, special events, bike riding, tourism and other activities.

Tourism is an important social benefit provided by State Forests. I note that Forest Corporation already provides extensive recreation activities, often totally ignored. For over thirty years, activists campaigning to stop native forest harvesting across NSW have promised lost jobs would be replaced by new jobs, particularly in eco-tourism. Small regional communities from Urbenville to Eden have suffered the social and economic consequence, as the promised replacement jobs failed to materialise.

An extensive, federally funded Social Licence research report, undertaken in 2023 by the NE NSW Forestry Hub, indicates there is overall support for the native forest industry on the NSW North Coast. Support for the retention of the native forest industry is 69 per cent, with just 17 per cent wanting closure of the industry. The report is available on the web.

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.

This issue is addressed below in relation to carbon and biodiversity benefits under the bolded headings below.

Opportunity 1. Ensure that native forestry harvesting and adaptive management retains a vital role to play in tackling climate change and biodiversity/ adaptive management, this opportunity area is expanded across NSW and that native forestry is supported

Forestry management in NSW is aligned with ecological sustainability, contributing to carbon sequestration and biodiversity protection.

The role of forests and wood products in mitigating climate change through carbon markets is recognized.

Sustainable forestry practices, such as thinning and ecological burning, are critical in reducing the risk of catastrophic bushfires, which are exacerbated by climate change.

An important Opinion Piece: Forestry has vital role to play in tackling climate change This opinion piece was published in The Mercury by Dr Michelle Freeman Vice President, Forestry Australia

- *This is because growing trees absorb carbon from the atmosphere. When the carbon being absorbed by young trees is more than the carbon emitted by harvesting, the forest becomes 'carbon-negative'.*
- *In Tasmania, this effect has gone one step further, as the trees regrowing after harvesting are not just absorbing more carbon than is emitted from harvesting trees, but they are absorbing more carbon than the entire state emits. To put it simply, if past timber harvesting had never occurred and new trees regrown, Tasmania's carbon-negative position would not have been achieved.*
- *However, in non-forest sectors of Tasmania, emissions have increased over the past 10 years. For now, these increased emissions are being offset by the growing trees in the forest sector. But, with a decline in timber harvesting, this offset will only provide a temporary respite – carbon absorption rates decline as forests age, meaning that unless there are heavy emission reductions in other sectors, Tasmania will struggle to maintain its carbon-negative position into the future.*
- *Forestry is the science and craft of creating, managing, conserving, using and caring for forests. It is an important tool for managing forest carbon and is one of the only sectors that can absorb more carbon than it emits. With young trees absorbing more carbon and old trees storing more carbon, a diverse multi-age managed forest provides a holistic solution to climate change.*
- *It will also lead to greater reliance on imports and alternatives with high carbon footprints, such as concrete and steel, as local, sustainable forest products become less available*
- *Australia has a global responsibility to tackle climate change and forestry has a significant role to play in this response.*

As noted in Sustainable forestry is part of the solution to Australia's environmental crisis Australian Forest Products Association 19 July 2022:

Ross Hampton also urged decision makers to heed the advice of the Intergovernmental Panel on Climate Change (IPCC), which says sustainably managing our native forests for timber delivers the best climate change mitigation results:

A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit."
– IPCC 4th Assessment

Venn (2023) also identified other important issues in relation to carbon materials:

- *increased production of substitute products with substantially higher levels of embedded carbon (e.g. steel, aluminium, plastic, brick, concrete, and carpet) (Sathre and O'Connor, 2010), and*
- *increased plantation and native forest timber imports that can drive forest degradation and rural land use change in developing and other producer countries*

Another issue is the increased usage of carbon in the long distance transport importing of timber from overseas.

In my opinion, what is usually missed in relation to native forestry and harvesting and carbon capture include a number of issues:

- **The areas harvested each year are small;**
- **Growth of older trees slows down and in most cases decay increases, reducing carbon storage;**
- **Regrowth is progressive each year over the small areas allowed for native forestry, capturing carbon. If past harvesting hadn't occurred, there would have been a lot more emissions;**
- **Adaptive and active management assist in addressing the carbon issue. Forest Corp are working on tackling eucalypt decline, due to the lack of mild fire across landscapes to improve forest health and optimise carbon capture;**
- **Considerable volumes of carbon are stored in harvested wood products. Including sawn timber, veneers, beams, flooring, poles, fencing etc etc;**
- **Considerable areas are retained in flora reserves and other areas;**
- **Forest access and fire trails increase speed of bushfire attack in many situations, reducing loss of carbon from bushfires;**
- **Inevitable intense bushfires kill large numbers of trees and markedly reduce the health of remaining trees for around 10 years plus, the carbon impacts are that high. This further reduces carbon storage, in most cases markedly. In relation to the disastrous impacts of the 2019/ 20 bushfires on carbon emissions, there are many papers in relation to this; and**
- **Transport distances and carbon usage is low with local production.**

These are all important issues that are conveniently missed in green agendas.

The expansion of native forestry harvesting and adaptive management retains must continue to play a role in tackling climate change and biodiversity/ adaptive management, this opportunity area is expanded across NSW and that native forestry is supported. Removal of locked up conservation land back to native forestry needs to be considered.

Opportunity 2. Ensure active and adaptive management applies to all NSW forests as used across US forests under cohesive legislation

A valuable article is attached in the link.

<https://arr.news/2022/01/25/opportunities-for-improved-fire-management-in-australia-john-odonnell/>

There is no such bill or similar bills across Australia in regards to the US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation. There is no effective, integrated nor broad federal/ state commitments in regards to what the US has committed to, reducing fuels, increasing prescribed burning, improving forest health and expanding community wildfire mitigation work.

There is an opportunity there for NSW to lead the way.

Opportunity 3. Address opportunities raised in the Venn report in relation to carbon and biodiversity benefits provided by State Forests

A very important report prepared by Venn (2023) report for Qld but applies to N NSW, NSW and indeed the principles apply across Australia. This paper is titled "Reconciling timber harvesting, biodiversity conservation and carbon sequestration in Queensland, Australia" by Tyron Venn. This work was partly supported by Forest and Wood Products Australia, project number PNC379-1516, entitled "Improving productivity of the private native forest resource in southern Queensland and northern New South Wales".

Key points from this paper (I have extracted the applicable text and, in some cases, have done this as dot points and bolded points to assist the reader), noting the similarities between N NSW forests and much of southern Queensland's forests:

Abstract

- *Under existing policy settings, increased land sparing in QLD has a high risk of unintended negative outcomes, including for international biodiversity conservation and carbon emissions.*
- ***While land sparing can benefit species that require long undisturbed forest habitat, conservation of most native flora and fauna in QLD is not substantially affected or is enhanced by selection harvesting practices permitted in the state.** Decades of poor government resourcing of conservation estate management and timber plantation expansion suggests increased land sparing will have negligible benefits for domestic biodiversity conservation and wood supply in the absence of a considerable and permanent reallocation of scarce resources.*
- ***In contrast, land sharing can provide greater long-term climate risk mitigation benefits, promote high biodiversity values through creation of heterogeneous landscape mosaics and leverage private sector resources for conservation activities. These complex ecological and economic trade-offs have been collated for the first time in an Australian context and justify further research to explore their quantification and accommodation within the land sharing–sparing framework to better inform forest policy-making.***

Further detail on this important paper are provided in Annexure B.

Opportunity 4: Reduce intense bushfires and risks to all NSW forests

There is a big opportunity to realise carbon and biodiversity benefits and support carbon and biodiversity by reducing intense bushfires as outlined in the Topics above. Quite simply, intense bushfires are mostly related to crazily excessive return low intensity fire intervals, massive fuel loads in our forests, increasing eucalypt decline due to lack of low intensity fire, increasing regeneration from intense bushfires and human incompetence at addressing these issues.

The result is a mass of dead trees and declining tree growth that will continue over 10 years plus. Plus, NSW have established a fire cycle of death of return intense bushfires.

This can simply be remedied by regular prescribed and maintenance burning every 3 to 6 years.

Opportunity 5. Address the information in Koala science and forestry, a good news story

This matter is outlined in Section 3 Topic 2. There are opportunities to start truth seeking in relation to the koala issue.

Opportunity 6. Address the ongoing failures of conservation management in NSW in relation to bushfires, carbon and biodiversity

What really concerns me in all this is if lands reverted to a lock up land management approach, in a very short time the inevitable eucalypt decline will get worse, dense understories will get worse and intense mega bushfires will decimate even larger areas. The forest health declines result in a considerable loss of carbon storage.

Then the inevitable intense bushfires kill large numbers of trees and markedly reduce the health of remaining trees for around 10 years, the impacts are that high. This further reduces carbon storage. In relation to the disastrous impacts of the 2019/ 20 bushfires on carbon emissions, there are many papers in relation to this. Refer to Gospers Mountain, the world's biggest ever individual bushfire in the world.

Lock up management just does not work, adaptive management does and it is totally unclear to me why NSW would consider phasing out timber harvesting/ thinning, including dense, high fuel load areas.

Attempt to stop native forestry for so called imaginary climate change credits is not the answer, seriously, this is green propaganda, again ignoring the facts and science.

Opportunity 7. Address the bushfire failures of thinking in NSW, a case study

Now, climate change issues have a higher importance than bushfire issues, including fuel load, fuel strata, understorey density, adaptive management and skilled forestry resources. And we can do something about fuel management in this country.

An example of this is in the Australian Alps Ministerial Council –Terms of Reference there is no reference to fire at all. To me, it is staggering that there is no reference to bushfires or fire management in the TOR. However, there is reference to climate change (4 refs). This further highlights the failures in NSW, ignoring critical issues such as fire management.

In the two Australian Alps Ministerial Council meetings of 10 November 2023 and 21 June 2024, again there is no reference of bushfires or fire management at all. Bushfires are surely the biggest risk to the alpine parks and surrounding communities. However, there is reference to horses (3 and 6 refs in the meeting minutes) and climate change (3 and 1 refs in the meeting minutes).

The 2003 bushfires burnt an estimated area of 1.73 M hectares of the Australian alps. The 2019/ 20 bushfires again burnt huge areas of the alps, much at high intensity and severity noting massive fuel loads over contiguous areas. Earlier bushfires also burnt large areas of the alps.

Prescribed burning is at very low areas of forested lands, 0.6 % of forested lands in NSW per year, inadequate to reduce bushfire risks. Expanded prescribed burning is required to reduce risks to alpine ecosystems, people and surrounding communities.

Opportunity 8. Address the failures of NSW climate change and biodiversity directions that need to be addressed for all forested and other lands

Refer Annexure C. Information above in the two reports in Annexure C further highlights to the author key failures in NSW:

1. Bushfire and fire biodiversity issues have been treated exceptionally poorly. Fire is a critical component of biodiversity management;
2. There is very poor actioning and understanding in relation to addressing the biodiversity issues related to lack of mild fire on ecosystems, including dense understories, decline in forest health, tree dieback and decline loss of fire resilience and declining biodiversity;
3. Lack of mild fire on ecosystems, results in declining forest health including dense understories, decline in forest health, tree dieback and decline of fire resilience and declining biodiversity on flora and fauna has been very poorly considered;
4. There is very poor actioning and understanding in relation to addressing the biodiversity issues related to intense bushfires on ecosystems, communities, infrastructure and fire fighters. Thinning and prescribed burning are at miniscule levels across NSW, at 0.6 % of NSW forests per year over the last 6 years;
5. NSW community, fire fighter and infrastructure safety are poorly considered and has become I believe a minor consideration in biodiversity management;
6. There appears very poor understanding of the link between adaptive management, including thinning and fire, and biodiversity;
7. There is very poor understanding of the importance of forest resilience in relation to bushfire, the focus is on climate changes. The author suggests the government have a look at forests now after the 2019/ 20 bushfires, with dead trees and fuel, unhealthy trees and dense understories, even worse intense bushfires to come;

8. The issue of Aboriginal matters is referenced moderately in the documents, but there are no linkages to low intensity burning under prescribed burning, ecological maintenance burning nor cultural burning; and
9. Climate issues have a higher importance than bushfire issues, including fuel load, fuel strata, understorey density, adaptive management and skilled forestry resources.

I don't consider that the two reports/ document teams had the broad skills required to examine natural resource issues and bushfire issues, this to me is highlighted in the issues covered and key failures identified above. I consider that the same thing happened with the 2019/ 20 bushfire review. I consider the same for ongoing koala reviews/ failures in consultation with affected parties. This is a massive issue in NSW, panels are often selected that provide one sided outcomes. There are experienced fire fighter/ fire managers, foresters, natural resource managers that know bushfire travel paths, and aren't green zealots nor activists, and could get NSW back on the right path.

Opportunity 9. Address failures in over regulation, regulatory creep and use of inadequate science in NSW

I consider that consequences of failed approaches and policies for biodiversity in NSW, including the offset listings and NSW response plan, include:

- Lost natural resource industry;
- Increased costs to surviving industry;
- Lost industry;
- Increased costs of regulation;
- Increased imports;
- Loss of adaptive management;
- Increased lock up and let it burn philosophy;
- Increased bushfire risks living anywhere near lock up areas and management;
- Loss of bushfire forest resilience;
- More bushfires and intense bushfires. Large impacts of bushfires on communities, firefighters and communities;
- Unsafe bushfire conditions for communities and firefighters, the NSW Government should consider this situation in relation to the industrial manslaughter legislation;
- More and more regulation and overlap; and
- Lost national productivity.

The consequences of failed approaches for biodiversity and recent biodiversity imposts in NSW are huge and negative. There are better ways, if NSW starts to listen.

Yet NSW is promoting even more extreme regulatory management, conservation lock up, no adaptive management and miniscule low intensity fire management.

More regulation and use of inadequate science isn't the answer. Forestry science and adaptive management is the answer.

7 Greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests (added by the Minister)

This issue is addressed in Topic 6. In my opinion, a large number of important issues are usually missed in relation to native forestry and harvesting and carbon capture.

The biggest risks to forests and carbon storage and capture are intense bushfires, highlighted in Topic 6 and throughout this submission.

I have highlighted a considerable number of opportunity areas in Topic 6, retaining all native forestry areas and taking conservation lands off NPWS for expanded adaptive management operations.

Stopping forestry for so called imaginary climate change credits is a furphy and I will be challenging this if it eventuates.

4 Assessment of state and local government decision failure approaches and games to assess native forestry not right, fair nor in the national interest.

The politically naive decisions made in relation to closing native forestry in Victoria, WA, SE Qld and to a degree NSW (many State Forests areas secretly transferred to NPWS control and 106 koala areas locked up despite miniscule areas available for harvesting) are based on a mass of concerning approaches used to close native forestry, including:

- Vote pandering;
- Lack of listening for foresters, industry and communities;

- Constantly denigrating native forestry;
- Nil appreciation of up to 150 years of native forestry;
- Lack of full understanding in relation to native forestry;
- Lack of forester input;
- Lack of understanding that native timber manufacturing and regional employment are critical issues for NSW, noting Minister Housoss is responsible for expanding manufacturing in NSW;
- No active consideration of housing, pole and fire wood native needs;
- No consideration of trade impacts, including extra timber imports;
- No consideration of sovereign risk in relation to loss of native timber harvesting;
- Green activism in regulatory agencies;
- Secretive and non-transparent processes;
- Selective committees to close forestry, occasionally stacked with and also selective meeting note processes;
- Focus on climate change only, without the full facts in relation to native forestry and no consideration of bushfire issues;
- Chasing climate change credits focus when not understanding all the native forestry, intense bushfires and eucalypt decline issues involved in climate change management;
- Very little understanding of forest active and adaptive management;
- Minimal understanding of the use of forestry science is used to treat forest health and resilience such as the US Forest Service;
- Limited understanding of the extent and increasing eucalypt decline;
- Limited understanding of bushfire science and factors behind intense bushfires and long fire runs and bushfires such as Gospers Mountain under NPWS management. NSW avoidance of optimised bushfire learning such as from the past such as forestry led prescribed burning associations and the forestry Commission leanings from the intense 1952 bushfires;
- Little appreciation of forestry fire fighter skills and contractors are critically important for NSW;
- Ongoing non-optimised community bushfire protection; and
- Selective capture of koala science.

These naive decisions are resulting in massive impacts and this will dramatically increase over time.

All the above concerns and decisions need to be addressed in the forestry action plan and an action plan prepared supporting forestry, including:

- Implement government support of native forestry;
- Start sound listening, including to foresters and obtain a full understanding in relation to forestry issues;
- Accept that up to 150 years plus of native forestry has been highly effective, many now declining in NPWS locked up lands;
- Understand that native timber manufacturing and regional employment are critical issues for NSW, noting Minister Housoss is responsible for expanding manufacturing in NSW;
- Incorporate active consideration of housing, pole and fire wood native needs;
- Incorporate active consideration of trade impacts, including additional timber imports;
- Active consideration of sovereign risk in relation to loss of native timber harvesting;
- Active consideration of war time timber needs and massive fuel loads in forests;
- Review green activism in regulatory agencies and hatred of native forestry;
- Stop the vote pandering;
- Change the secretive and non-transparent processes in relation to forestry, including the koala park and review committees to close forestry, occasionally stacked with selective meeting note processes;
- Stop chasing climate change credits by trying to close forestry as a way to get credits;
- Address climate change, but with the full facts in relation to native forestry and bushfire issues;
- Maximise understanding of active and adaptive management in NSW forests;
- Understand and address the importance of forestry science which is used to treat forest health and resilience such as the US Forest Service;
- Understand the extent and increasing eucalypt decline;
- Obtain an optimised understanding of bushfire science and factors behind intense bushfires and long fire runs and bushfires such as Gospers Mountain. Allow NSW to optimise bushfire learning such as from the past such as forestry led prescribed burning associations and the forestry Commission leanings from the intense 1952 bushfires;
- Accept forestry fire fighter skills and contractors are critically important for NSW;
- Develop optimised community bushfire protection; and
- Fully capture of key koala science and science provided by Vic Jurskis and others which has been hidden.

Other matters need to be addressed in the forestry action plan and the plan prepared supporting forestry:

- Accept world class sustainable harvesting techniques used in NSW;
- Use of truthful forestry science and not the denigrate forestry science;
- Stop the ongoing untruths;
- Review the green media links;
- Accept the fact that forestry has positive impacts on biodiversity;
- Accept the fact that no threatened species has been lost to native forestry;
- Promote prescribed burning dramatic expansion across NSW, to reduce intense bushfire disasters, severe bushfire intensity and the cycle of death;
- Undertake a major review of conservation management in NSW, our conservation areas and prescriptions are going backwards in terms of cycle of death intense megafires, declining forest health, upside down forests, increasing eucalypt decline and declining forest resilience; and
- Undertaking beneficial regulation in relation to forestry in NSW using non-regulatory means, as outlined in NSW Government Guide to Better Regulation Policy and Guidelines Paper January 2019 TPP 19-01.

These are massive opportunities to prepare a sound forestry action plan for NSW, we will see.

5 Consequences of current inadequate support of native forestry and over overzealous regulation

I consider that consequences of inadequate support of native forestry and over overzealous regulation for NSW native forests include:

- Lost natural resource industry;
- Reduced/ lost native timber manufacturing and regional employment;
- Increased costs to surviving industry;
- Increased costs of regulation;
- More and more regulation and overlap;
- More and regulatory creep, refer the recent offset changes as an example;
- Lost national productivity;
- Increased timber imports;
- Increased sovereign risks;
- Loss of adaptive management in forests;
- Increased lock up and let it burn conservation philosophy, resulting in more intense bushfires;
- Increased bushfire risks living anywhere near lock up areas and management;
- Loss of bushfire forest resilience;
- Non optimised community bushfire protection;
- More bushfires and intense bushfires. Large impacts of bushfires on communities, firefighters and communities;
- Loss of forestry fire fighter skills and contractors, who are critically important for NSW;
- Lost forestry skills;
- Unsafe bushfire conditions for communities and firefighters, the NSW Government should consider this situation in relation to the industrial manslaughter legislation; and
- Perverse outcomes.

The consequences of failed approaches for biodiversity and recent biodiversity imposts in NSW are huge and negative. There are better ways, if NSW starts to listen.

6 Assessment the industry and the environment 40 years ago and 30 years' time

Before I assess the native timber industry and the environment in 30 years' time, I will go back 40 years on State Forest lands:

- There was extensive active and adaptive management across State Forests;
- There was more prescribed burning;
- State Forests was allowed to be innovative and introduced Bushfire Prevention Associations and aerial prescribed burning around 1967;
- Prescribed burning was relatively easy to do without barriers and crazy rules;
- Fire trails and roads were installed and maintained;
- Forest roads and forestry/ harvesting personnel were important in bushfire control;
- Quick bushfire attack was the go;
- There were less major and high intensity bushfires;
- Habitat for fauna was generally good;
- Conservation group think wasn't there;
- Overzealous regulation wasn't in place;
- Forests were more open with less dense understories than they are now;
- Eucalypt decline was limited;
- Extensive employment in the timber industry, including mills, harvesting, haulage and forest personnel;

- Extensive forest research undertaken; and
- Active multiple use of forests.

Native forestry and adaptive management in 30 years' time if allowed to continue as is on the same lands:

- There continues to be active and adaptive management across State Forests;
- There was still inadequate prescribed burning due to ridiculous barriers, bureaucracy, rules and restrictions by NSW;
- State Forests was restricted in prescribed burning;
- Prescribed burning is not easy to do;
- Somewhat inadequate fire trails and roads were installed and maintained;
- Forest roads and forestry/ harvesting personnel were important in bushfire control;
- Quick bushfire attack was the go;
- There were more major and high intensity bushfires due to government fuel mismanagement across forested landscapes;
- Habitat for fauna was generally good;
- Overzealous regulation remains in place;
- Unlogged and low prescribed burnt forests have dense understories;
- Eucalypt decline is limited to unmanaged sections;
- Reasonable employment in the timber industry, including mills, harvesting, haulage and forest personnel;
- Less extensive forest research undertaken, but important; and
- Active multiple use of forests.

Lock up and let it burn NPWS conservation area management in 30 years' time:

- Virtually nil active and adaptive management across conservation areas;
- There is still inadequate prescribed burning due to ridiculous barriers, bureaucracy, rules and restrictions by NSW;
- Conservation areas is restricted in prescribed burning. Lock up and let it burn conservation management applies;
- Prescribed burning is not easy to do. Treating outer edges of parks with prescribed burning doesn't work. Fire return intervals remain excessive.
- Inadequate fire trails and roads installed and maintained;
- Limited forest roads and no forestry/ harvesting personnel, so limited opportunities in bushfire control;
- Slow bushfire attack is the go or watch the fires;
- There were more major and high intensity bushfires due to government fuel mismanagement across forested landscapes. More bushfires will occur, bigger than Gospers (previous largest individual bushfire in the world);
- Cycle of death bushfire management applies with limited bushfire learning;
- Habitat for flora and fauna is generally poor with declining trees and dense understories;
- Overzealous regulation is much less so for conservation areas;
- Unlogged and low prescribed burnt forests have dense understories;
- Eucalypt decline is widespread;
- Non resilient forested landscapes;
- Nil employment as in the timber industry, including mills, harvesting, haulage and forest personnel;
- Limited effective forest research undertaken, much of it is wishy washy anti forestry crusades;
- Limited multiple use of forests

I believe that this is a fair summary of where I see things in 30 years' time. Conservation management doesn't provide the answers and we are heading for bushfire and ecological disasters.

7 Conclusions

The forestry action plan represents an important chance to get this right, but we will see.

Consultation is disappointing and affected parties have not been consulted. It is clear to me from what I have seen with poor consultation is that the negatively affected sectors to this impost have not been adequately listened to, just like what is happening with the current koala park so called consultation. I believe it isn't fair nor reasonable consultation.

The green push to close the native industry must be stopped. I believe that their demands are endless and can never be satisfied.

It's time to start only listening to the forestry side and poorly thought out policy, reports, approaches and vote pandering.

Already some 88% plus of State Forests and National Park in NSW is reserved from harvesting. Enough is enough. Stop the failed lock up and let it burn conservation management and wanting more of this and this, they can sort their mess out.

Thus, for transparency reasons, it is critical that all and each submission issue is responded to in a thorough Submissions Report, just as developers are required and made publicly available well before any impost decisions are made. Otherwise this consultation process will be seen for what it is.

There will be even more failures for biodiversity and communities and disasters if native forestry is stopped or phased out.

Annexure A. Recent activity to add Koalas and 34 other threatened species to the Biodiversity Offsets Scheme and there are broader biodiversity failures

In NSW there has been recent activity to add Koalas and 34 other threatened species to the Biodiversity Offsets Scheme and there are broader biodiversity failures of the current and proposed approaches. I made a 11 page submission to the Premier dated John O'Donnell 26 July 2024

This new change to the NSW Government's Biodiversity Offsets Scheme was very quietly opened for consultation, with virtually nil forestry, agriculture and mining consultation. As well there was definitely no awareness offered re the impacts of the changes, nor a reasonable period to comment. I understand that the NSW Department of Environment and Heritage didn't even provide a media release, yet opened the 21-day public consultation period for the public to comment last Monday, with consultation to close on the 29th of July 2024.

In addition, there has been a piece meal approach to providing media coverage and release of information in relation to other aspects of biodiversity in NSW, including nature positive approaches. This is very disappointing and seems to be occurring often in NSW.

Nominations for changes to the list of threatened entities at risk of Serious and Irreversible Impacts updated the list under the Biodiversity Offsets Scheme, but the list is 34 species, and it will have huge impacts on developers, landholders, mining, forestry and many others.

This new change to the NSW Government's Biodiversity Offsets Scheme was very quietly opened for consultation very recently, with virtually nil forestry, agriculture and mining consultation. It was hidden deeply in a web site (refer link) and only picked up by an observant person on the outside.

<https://www2.environment.nsw.gov.au/topics/animals-and-plants/biodiversity-offsets-scheme/clear-and-develop-land/serious-irreversible-impacts>

As well there was definitely no awareness offered re the impacts of the changes on the different sectors in NSW, nor a reasonable period to comment. I understand that the NSW Department of Environment and Heritage didn't even provide a media release, yet opened the 21-day public consultation period for the public to comment last Monday, with consultation to close on the 29th of July 2024.

I provided a submission to the Premier titled "Push to add Koalas and 34 other threatened species to the Biodiversity Offsets Scheme and broader biodiversity failures of the current and proposed approaches. Submission by John O'Donnell 26 July 2024."

I received this response (refer attached), I believe a very ordinary response in relation to consultation and not addressing the major issues I raised.

"DCCEEW made a concerted effort to ensure that stakeholders were informed about the public display of nominations related to the Biodiversity Offsets Scheme list of entities at risk of serious and irreversible impacts. Notification occurred through the Biodiversity Offsets Scheme Updates Newsletter (Update No. 29). Subscribers to the newsletter included the NSW Minerals Council and NSW Farmers Association".

I am advised that interesting is that neither the Minerals Council or NSW Farmers had any knowledge of the matter. Certainly all the other sectors didn't know what was happening. Hiding something as important as this matter in a newsletter highlights very disappointing behaviour and better policy and approaches are needed.

Knowing what I know about the ongoing failures and approaches to biodiversity management in NSW, I believe that it is extremely unlikely that current regulatory approaches will ever work in NSW, because:

1. NSW approach is to use more and more regulation and continues to be an abysmal failure;
2. There has been inadequate consultation with affected parties;
3. Poor treatment against landholders, forestry, developers etc that governments need to work with;
4. NSW and the use of inadequate science and approaches underway;
5. What is going on with the massive failures of effective consultation, including for the koala park;
6. Nil action in relation to eucalypt decline; miniscule action in relation to prescribed burning and bushfire management; miniscule action in relation to adaptive management as the US is undertaking; Lock up and Let it Burn conservation failures;
7. Fire intervals between fire events beyond belief and nowhere near those of Aboriginal times;
8. Consequent flora and fauna decline, including threatened species and EECs;

Overzealous regulation, poor consultation and poor science isn't the answer for NSW. And decimating businesses and sectors isn't the answer either.

I have read the NSW Government Guide to Better Regulation Policy and Guidelines Paper January 2019 TPP 19-01 and respectfully asked the Treasury Better Regulation Team the following questions:

- Did DECCW/ DEH/ NSW Government or other seek regulatory input from Treasury's Regulatory Improvement Branch in relation to the changes in species listings in relation to offsets?
- How was the step to reduce and remove regulatory barriers to make it easier, and less costly, to do business in NSW considered in adding these 34 new offset threatened species listings?
- Were non-regulatory alternatives considered?
- Have the requirements of "Consultation with business, and the community, should inform regulatory development" been met in the changes in species listings in relation to offsets?
- How were the regulatory impacts of these changes in species listings in relation to offsets considered?
- Has an assessment of the impacts of the proposal identified and justified through quantitative and qualitative analysis of all available data?
- Has an assessment of the use and compliance with the Better Regulation principles in developing the additional 34 species offset listings been undertaken?
- Are the NSW agencies audited in relation to their regulatory approaches and updates and use of alternative approaches to regulation, in particular environmental agencies where regulatory creep is ongoing?

I am awaiting a response.

Nominees and Respondents will receive an email explaining the outcome of the nomination. Changes to the list of entities at risk of SAI will be made in conjunction with updates to the BAM-Calculator around September/October and will be further communicated in the BOS Newsletter.

I ask a legitimate question how one unit under a government agency can run rough shod over individuals and businesses, without sound regulatory review, likely nil review by Treasury Better Regulation unit. It is a disappointing to what is happening and regulatory creep designed to extract money or stop work.

Annexure B. Important report prepared by Venn report for Qld but applies to N NSW

A very important report prepared by Venn (2023) report for Qld but applies to N NSW, NSW and indeed the principles apply across Australia. This paper is titled "Reconciling timber harvesting, biodiversity conservation and carbon sequestration in Queensland, Australia" by Tyron Venn. This work was partly supported by Forest and Wood Products Australia, project number PNC379-1516, entitled "Improving productivity of the private native forest resource in southern Queensland and northern New South Wales".

Key points from this paper (I have extracted the applicable text and, in some cases, have done this as dot points and bolded points to assist the reader), noting the similarities between N NSW forests and much of southern Queensland's forests:

Abstract

- *Under existing policy settings, increased land sparing in QLD has a high risk of unintended negative outcomes, including for international biodiversity conservation and carbon emissions.*
- **While land sparing can benefit species that require long undisturbed forest habitat, conservation of most native flora and fauna in QLD is not substantially affected or is enhanced by selection harvesting practices permitted in the state.** *Decades of poor government resourcing of conservation estate management and timber plantation expansion suggests increased land sparing will have negligible benefits for domestic biodiversity conservation and wood supply in the absence of a considerable and permanent reallocation of scarce resources.*
- **In contrast, land sharing can provide greater long-term climate risk mitigation benefits, promote high biodiversity values through creation of heterogeneous landscape mosaics and leverage private sector resources for conservation activities. These complex ecological and economic trade-offs have been collated for the first time in an Australian context and justify further research to explore their quantification and accommodation within the land sharing–sparing framework to better inform forest policy-making.**

1. Introduction

*In Europe, North America and Australia, timber harvesting in native forests has been politically charged for decades, with numerous conflicts between environmental groups, the timber industry and government agencies over the impacts of timber production on biodiversity (Cubbage et al., 1993; Dargavel, 1995; Hellström, 1999; Furness et al., 2015; Davey, 2018a). Australia's National Forest Policy Statement (Commonwealth of Australia, 1992) recognises the need for a sound scientific basis for sustainable forest management, efficient forest use, and provision of other social and conservation objectives. **However, opportunities for sustainable harvesting in native forests of Australia have often been overtaken by domestic politics that play to key ideological symbols and short-term political interests, rather than according to scientific evidence and the long-term national and global interests (Kanowski, 2017; Dargavel, 2018; Deegen, 2019; Jackson et al., 2021; Forestry Australia, 2022). This has been exacerbated by confusion about the environmental impacts of forestry due to:***

a) low public awareness, including a false understanding that biodiversity can only be protected by prohibiting timber harvesting (Florence, 1996; Wilkinson, 2006; Edwards et al., 2014b; Matysek and Fisher, 2016);

b) government statistics that record forestry as a form of land clearing alongside urban, mining and agricultural developments (Metcalf and Bui, 2016; Curtis et al., 2018; Anon, 2021);

c) the media providing similar levels of coverage to both published, peer reviewed scientific research and unsubstantiated assertions made by individuals with no formal science qualifications (e.g. Honan, 2021);

and

d) instances of false or unsupported claims about native forest management published in peer-reviewed scientific journals (Poynter and Ryan, 2018).

*The economic reality is that rural land is managed for mineral, crop, livestock and timber production because of domestic and international demand for these goods. **When a government implements policies to limit domestic native forest timber production, the excess domestic timber demand will be satisfied by a combination of substitution with domestic plantation timber (for some product types if there is excess supply), increased production of substitute products with substantially higher levels of embedded carbon (e.g. steel, aluminium, plastic, brick, concrete, and carpet) (Sathre and O'Connor, 2010), and increased plantation and native forest timber imports that can drive forest degradation and rural land use change in developing and other producer countries (Meyfroidt et al., 2010; Seto et al., 2012; Petrokofsky et al., 2015a; Moran and Kanemoto, 2017; Pendrill et al., 2019; Hoang and Kanemoto, 2021). Timber importing nations can falsely appear to be more ecologically sustainable at the regional scale, with governments and consumers rarely taking responsibility for, or even being***

aware of, the environmental damage and ecosystem changes that occur in the country from where their wood originates (Kastner et al., 2011; Mills Busa, 2013).

Conclusion

In many parts of the world, including Queensland (QLD), Australia, the ecological and economic realities that should inform native forest policy and management can become sidelined by politics, which threatens global action to conserve biodiversity and mitigate climate risk. By facilitating quantification of the timber production, biodiversity conservation and climate risk mitigation trade-offs associated with strict conservation, extensive forestry and intensive forestry, the land sharing–sparing framework can provide a transparent method to develop ecologically sustainable forest policy informed by science and economics.

This paper introduced a modified conceptualisation of the framework to better reflect the role that trade in wood products plays in facilitating domestic land sparing by shifting the biodiversity and carbon footprint of consumption offshore. This paper also presented the first comprehensive review of the ecological and economic trade-offs between land sharing and sparing in QLD, finding that:

- 1. land sparing policies enacted by Australian states since the 1980s have coincided with a rapidly growing international ecological footprint of Australian consumers in forests of developing countries;***
- 2. land sharing is likely to provide greater long-term climate risk mitigation benefits in QLD than land sparing coupled with substitution of domestic wood products for non-wood products and imported timbers;***
- 3. land sharing can overcome many of the economic impediments to satisfying domestic timber demand through land sparing with timber plantations;***
- 4. inadequate operational funding for conservation area management means increased land sparing is unlikely to effectively conserve and recover many threatened species;***
- 5. there is no evidence that land sharing increases wildfire risk in QLD;***
- 6. land sharing can mobilise private sector resources for domestic conservation and wildfire management activities;***
- 7. conservation of the majority of native flora and fauna in QLD is not substantially affected or is enhanced by land sharing, while land sparing can benefit a comparatively small group of species that require long undisturbed forests; and***
- 8. a mix of land sharing and land sparing (the triad policy B in Fig. 1) shows greatest promise to conserve the full suite of biodiversity in QLD by producing diverse ecological and structural conditions over space and time.***

Given the ecological and economic realities of forest management in QLD, it is challenging to mount a strong argument in favour of increased land sparing in the state. However, for QLD to take full advantage of the benefits of land sharing for biodiversity conservation, and climate risk mitigation, sovereign risk must be addressed. Further research is justified to tackle gaps in knowledge, quantify the ecological and economic trade-offs between sharing and sparing, and explore opportunities to apply the sharing–sparing framework to inform evidence-based forest policy in QLD.

Annexure C. Failures of NSW climate change and biodiversity direction

A close examination of the 2023 Henry Review report and NSW 2024 response document to better assess where NSW is going with biodiversity

To best tease out what is going on, what is happening behind the scenes, what is not happening behind the scenes, areas of focus and gap/ missing areas, I assessed the 2023 Henry Review report and NSW plan for nature (July 2024) response document individually as highlighted below in terms of number of references.

The 2023 Henry review referencing use:

- Biodiversity, 565 references
- Plan, 85 references
- Aboriginal, 44 references
- Fire, 9 references
- Bushfire, 8 references
- Burn, 2 references
- Prescribed burn, 0 references
- Forest, 12 references
- Adaptive, 2 references
- Resilience, 9 references
- Forest decline, 0 references
- Fire interval, 0 references
- Climate, 18 references

The NSW plan for nature (July 2024) referencing use:

- Biodiversity, 214 references
- Plan, 40 references
- Aboriginal, 36 references
- Fire, 2 references
- Bushfire, 1 reference
- Burn, 0 references
- Prescribed burn, 0 references
- Forest, 2 references
- Adaptive, 1 reference
- Resilience, 4 references
- Forest decline, 0 references
- Fire interval, 0 references
- Climate, 8 references

This information above in the two reports further highlights to the author key failures in NSW:

1. Bushfire and fire biodiversity issues have been treated exceptionally poorly. Fire is a critical component of biodiversity management;
2. There is very poor actioning and understanding in relation to addressing the biodiversity issues related to lack of mild fire on ecosystems, including dense understories, decline in forest health, tree dieback and decline loss of fire resilience and declining biodiversity;
3. Lack of mild fire on ecosystems, results in declining forest health including dense understories, decline in forest health, tree dieback and decline of fire resilience and declining biodiversity on flora and fauna has been very poorly considered;
4. There is very poor actioning and understanding in relation to addressing the biodiversity issues related to intense bushfires on ecosystems, communities, infrastructure and fire fighters. Thinning and prescribed burning are at miniscule levels across NSW, at 0.6 % of NSW forests per year over the last 6 years;
5. NSW community, fire fighter and infrastructure safety are poorly considered and has become I believe a minor consideration in biodiversity management;
6. There appears very poor understanding of the link between adaptive management, including thinning and fire, and biodiversity;
7. There is very poor understanding of the importance of forest resilience in relation to bushfire, the focus is on climate changes. The author suggests the government have a look at forests now after the 2019/ 20 bushfires, with dead trees and fuel, unhealthy trees and dense understories, even worse intense bushfires to come;
8. The issue of Aboriginal matters is referenced moderately in the documents, but there are no linkages to low intensity burning under prescribed burning, ecological maintenance burning nor cultural burning; and
9. Climate issues have a higher importance than bushfire issues, including fuel load, fuel strata, understorey density, adaptive management and skilled forestry resources.

I don't consider that the two reports/ document teams had the broad skills required to examine natural resource issues and bushfire issues, this to me is highlighted in the issues covered and key failures identified above. I consider that the same thing happened with the 2019/ 20 bushfire review. . I consider the same for ongoing koala reviews/ failures in consultation with affected parties. This is a massive issue in NSW, panels are often selected that provide one sided outcomes. There are experienced fire fighter/ fire managers, foresters, natural resource managers that know the correct paths, and aren't green zealots nor activists, and could get NSW back on the right path.

Further assessment of ongoing failures and approaches to biodiversity management

As outlined in a Guardian article titled NSW government says state's biodiversity 'in crisis' as it pledges first steps to reverse decline (dated 17 July 2024) I extracted in the link below:

<https://www.theguardian.com/australia-news/article/2024/jul/17/nsw-government-says-states-biodiversity-in-crisis-as-it-pledges-first-steps-to-reverse-decline#:~:text=Australia%20news-.NSW%20government%20says%20state's%20biodiversity%20'in%20crisis'%20as%20it%20pledges,first%20steps%20to%20reverse%20decline&text=The%20New%20South%20Wales%20government,of%20beloved%20species%20and%20ecosystems.>

Extracted text:

The plan will deliver on three key election commitments in this term of government: to reform the biodiversity offsets scheme, to end excess land clearing and strengthen environmental protections.

It also outlines the legislative, policy and program directions the NSW Government will take to respond to the statutory reviews and deliver on its commitments.

The response:

- *recognises a change in approach is needed to set nature on a path to recovery;*
- *acknowledges the intrinsic relationship between biodiversity and Aboriginal culture and recognises the social, economic and environmental benefits that flow from caring for Country as well as the broader interests' Aboriginal people have in biodiversity and land management issues;*
- *sets out short, medium and long-term priority actions to improve biodiversity protections and land management practices;*
- *sets the direction to halt and reverse biodiversity loss and support environmental repair and regeneration;*
- *introduce a NSW Nature Strategy to guide actions to protect, restore and enhance ecosystems and landscapes;*
- *recognises the strong connection farmers and landholders have with their land and the key role they play in managing and enhancing native vegetation and natural assets;*
- *outlines NSW Government support for landholders to access emerging natural capital markets, incentivising them to undertake sustainable farming practices while protecting and restoring their environmental assets;*

Knowing what I know about the ongoing failures and approaches to biodiversity management in NSW, I believe that it is extremely unlikely that an NSW Nature Strategy to guide actions to protect, restore and enhance ecosystems and landscapes (and other actions and directions) will ever work in NSW, because:

1. NSW approach is to use more and more regulation is and continues to be an abysmal failure;
2. There has been inadequate consultation with affected parties;
3. NSW and the use of inadequate science and approaches underway;
4. What is going on with the failures of consultation, including for the koala park;
5. Ongoing vote pandering and green linkages in NSW and federally;
6. Nil action in relation to eucalypt decline (more on this below);
7. Miniscule action in relation to prescribed burning and bushfire management;
8. Miniscule action in relation to adaptive management as the US is undertaking;
9. Lock up conservation failures;
10. Fire intervals between fire events beyond belief and nowhere near those of Aboriginal times;
11. Consequent flora and fauna decline, including threatened species and EECs; and
12. Probable backlash against landholders, forestry, developers etc that governments need to work with.