

JOHN SAMUEL

Submission ID: 203290

---

**Organisation:** N/A

---

**Location:** New South Wales

---

**Supporting materials uploaded:** N/A

Submission date: 10/8/2024 5:16:25 PM

---

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

---

By any measure FCNSW are operating sustainable forestry as follows. FCNSW are certified to AS4708:2021, Responsible Wood and so PEFC-certified, demonstrating their sustainability of forest operations through external audits to a standard recognised world-wide as sustainable forest management.

With regard to sustainable timber supply, FCNSW's 2022-23 Sustainability report shows they are harvesting considerably less than the FRAMES Predicted sustainable volume in all log types. The very extensive regulated and EPA audited Coastal Integrated Forestry Operation Approval (CIFOA) Coastal IFOA conditions and Coastal IFOA protocols add further assurances of sustainability.

Private forests are not subject to any of the above, excepting EPA audit of Private Native Forest operations under LLS administered Farm Forestry. Here PNF Codes of Practice, set out the sustainability requirements along with mapping undertaken by LLS on behalf of the private owner to form a forestry plan for that property.

For Private forests without a PNF, there are generally no management plans nor oversight, so sustainability or not is not known.

National Parks do often have management plans, but no external review or oversight if they are being managed sustainably. It is just assumed they are sustainable as no harvesting takes place. Forest sustainability is much wider than whether trees are harvested or not.

---

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

---

Here again, FCNSW are a leader, being the only tenure with a species, including threatened, monitoring system, both within and outside harvestable areas. Numerous academic papers have been published showing that harvesting does not impact species e.g, Law BS, Brassil T, Gonsalves L, Roe P, Truskinger A, McConville A (2018) Passive acoustics and sound recognition provide new insights on status and resilience of an iconic endangered marsupial (koala *Phascolarctos cinereus*) to timber harvesting. PLoS ONE 13(10): e0205075. <https://doi.org/10.1371/journal.pone.0205075>, Tree use by koalas after timber harvesting in a mosaic landscape. B Law, C Slade, L Gonsalves, T Brassil, C Flanagan, I Kerr Wildlife Research 50 (7), 581-592, Broad-scale acoustic monitoring of koala populations suggests metapopulation stability, but varying bellow rate, in the face of major disturbances and climate extremes

B Law, L Gonsalves, T Brassil, I Kerr, Ecology and Evolution 14 (5), e11351.

National Parks have abandoned their WildCount limited species monitoring, now only controlling ferals through Saving Our Species.

Cultural programs operate in both in State Forests and National Parks.

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

---

Australia imported \$6,688 million of timber products in 2022-23, nearly 3 times the export value of wood products (ABARES). \$78.3 million was sawn hardwood, \$519.6 million sawn softwood. At this time, the value of NSW native hardwood harvested was worth \$100.5 million (half that of 2007-08), hardwood plantations \$23.6 million, softwood \$297.9 million (ABARES).

Clearly NSW is in a poor trading position, reliant on imported timber for housing construction. Any reduction in the forest area that can be harvested will worsen the situation for NSW, it needs to be increased.

This can be done in native forests by encouraging private native forest owners to harvest their forest and in State Forests through a review of the CIFOA restrictions on harvest areas and induced costs.

NSW has a land area bigger than France and Finland combined and a forest area similar in size to the whole land area of the United Kingdom.

Plantations need to be established through 'right tree in the right place' to reduce the import costs, supply housing and infrastructure whilst also growing the economy and increasing jobs.

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

---

Unfortunately, land prices for establishing plantations of 'right tree in the right place' make new plantations for timber non-economic in cleared agricultural land, without incentives. ABARES indicate in 2023 in southern Australian beef country land was \$15,358/ha and northern cropping regions \$11,502/ha. A large number of ex- MIS managed investment scheme plantations have been cleared back to agricultural land, though some of these were 'wrong tree in the wrong place'.

Therefore, (as in comments in 3) future supplies can be increased from native forests by encouraging private native forest owners to harvest their forest and in State Forests through a review of the CIFOA restrictions on harvest areas and the related induced costs.

NSW has a land area bigger than France and Finland combined and a forest area similar in size to the whole land area of the United Kingdom.

Despite agricultural land prices, plantations need to be established through 'right tree in the right place' to reduce the import costs, supply housing and infrastructure whilst also growing the economy and increasing jobs.

Increasing supply could be incentivised by working with the Commonwealth to allow carbon sequestration credits on all forests including those forests that are harvested. Full life cycle analysis of harvested native forests including arising products have shown greater carbon sequestration than non-harvested native forests <https://fwpa.com.au/wp-content/uploads/2023/09/Forests-Plantations-Wood-Products-and-Australias-Carbon-Balance-.pdf>.

Biodiversity credits are another potential incentive, again it should be available for all forest types (apolitical) including the biodiverse harvested native forests. Harvesting benefits some species (including koalas) but not others. Current mono-culture softwood plantations will likely find few biodiversity credits.

### **Topic 5. The role of State Forests in maximising the delivery of a range of environmental, economic and social outcomes and options for diverse management, including Aboriginal forest management models**

---

They are on this journey and see it as part of this mission.

**Topic 6. Opportunities to realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks, including the greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests**

---

Such actions must be apolitical, tenure neutral and not be designed to exclude harvested native forests or any other types.

As per 4. Increasing supply from native forests and encouraging plantations could be incentivised by working with the Commonwealth to allow carbon sequestration credits on all forests including those forests that are harvested. Full life cycle analysis of harvested native forests, inclusive of arising products and their life cycle, have shown greater carbon sequestration than non-harvested native forests <https://fwpa.com.au/wp-content/uploads/2023/09/Forests-Plantations-Wood-Products-and-Australias-Carbon-Balance-.pdf>.

Biodiversity credits are another potential incentive, again it should be available for all forest types (apolitical) including the biodiverse harvested native forests. Harvesting benefits some species (including koalas) but not others. Current mono-culture softwood plantations will likely find few biodiversity credits.