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

Forestry NSW operations which focus on pine plantation harvest are widely acknowledged as environmentally and financially sustainable. However its operations in native forests are neither. The three key factors that govern the future sustainability for native forest harvesting by the industry are 1) quantum of timber available 2) implications of projected timber harvest for biodiversity and 3) Is harvesting native timber financially viable.

The harvest of native timber fails on all three counts. Numerous industry estimations of available timber from native forest in the last 4 years (post Black Summer) have been damning (including NSW Government's own NRC estimates), It is just not worth logging increasingly more remote stands of trees, often of minimal girth and dubious integrity. Such stands are harder and harder to access and cause untold environmental damage as they are accessed with heavy machinery. Yet this is increasingly all that is available to log because 'easy to access' stands have already been taken. I have personally gone into many logged forests and been shocked at the damage to the environment is left behind as a fire hazard and the shocking condition of trees that are left as 'habitat' or 'food' trees by contractors. (see photos attached in my PDF cover letter) This then highlights the fact that biodiversity recovery has been slow since the black summer fires. In that period so many more species have been uplisted as threatened or endangered on a regional and state wide basis (eg gang gang cockatoos, greater gliders, koalas). This is the case all across the state. And finally, what is the economic merit of harvesting native forest when the vast proportion of that which comes from the south of the State in particular ends up as woodchip, a highly subsidised export industry. I resent that as a tax payer I am subsidising such a wanton industry. I am aware that this is less the case in the north of the state, but the ongoing survival of species like the greater glider and koala in NSW means that we need to protect every stand of state owned native forests which these species call home. The construction industry relies on plantation pine - figures generated from the construction industry support this (anecdotally I regularly check this with builders who confirm it to be the case) and if consumers wish to have specialty (native)timbers, they should be prepared to pay for those that are sourced from plantations. And finally, the end use of timber from state forests as tomato stakes, firewood or pallets, can not, in any circumstances be considered a worthy alternative to leaving the trees in the ground.

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

This is immense. I am not indigenous and so will not speak to the cultural heritage values that our forests provide for them but the environmental values of forests left standing are self evident in the face of an extinction crisis, and an increasing recognition of the value of native forests as carbon sinks, as habitat and as places which sustain humans.

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

Native hardwoods comprised 2.4 million (9%) of Australia's log production of 25 million cubic metres in 2023, with half this exported as woodchips. Saw and veneer logs comprised just 8% of the 8.5 million cubic metres of logs obtained from hardwood plantations, with 87% exported as woodchips. There is no longer any need to log public native forests to build houses. With a change in emphasis we can satisfy our hardwood needs with sawn timber and composite timber products from plantations. Repeated analyses of the industry undertaken by the Blueprint Institute, Frontier Economics and others support this response. Pine is used in construction - that is undisputed. Decking is often cited as a use of native timber - however it is recycled plastic (eg. modwood, Ecowood brand) which is now far more durable, low maintenance and crucially, fire resistant. Re the transport and retail industries, the primary use here is for pallet production. However - the recognised life of a hardwood pallet is just 95 days. Surely we should be valuing pallets more than accepting such a short duration for their life before they end up in landfill? I am not in the position to comment on the mining industry use of native timber.

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

More than 90% of the log production in NSW - both softwood and hardwood - now comes from plantations. There is a strong need to develop plantations on cleared land which can supply high value native timber for veneers and for logs. This should have been anticipated by the forestry industry and planned for with the private sector in the decades past. It is now time for the NSW Government to act and encourage this. Australia is almost the only developed country in the world which allows its native forests to be harvested, with no future proofing for ecosystem resilience in the face of climate change and little concern for how financially viable the industry is. Several states have considered the sustainability of the industry and made the prudent decision to desist native forest logging. Woodchip should not be the primary end use of our native forests. This industry would not have continued as it has to date without the subsidisation from successive state governments. The studies I have referenced earlier support the fact that softwood plantations and existing hardwood plantations to a lesser extent can supply the timber needs for NSW. Private native forestry with strong ecological governance in place can assist, and the establishment of plantation on cleared land should be encouraged.

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

Our state forests should indeed be refocussed to deliver more of the environmental and social outcomes they already do - as tourism ventures, as mountain biking destinations, as habitat for our fauna. The numbers of individuals involved in logging the state forests is small and these same people currently engaged to operate big machinery through the state forests to harvest timber can be fully redeployed to manage replanting, maintain trails, ensure fire resilience of the forest and in fire management. This has been economically costed and demonstrated in studies undertaken by ANU, by Frontier Economics, by ACBF and by Blueprint Institute. Aboriginal forest management models that involve the use of 'forest gardening' can only be seen to be quasi initiatives for the existing industry to continue...as has been seen to be the case in Victoria. In the South of NSW the Walbunja Rangers Group is a strong and growing indigenous group involved in control feral of animals, managing weeds, monitoring forests flora and fauna, and applying indigenous fire principles to forest. The support of such indigenous forest management models that exclude 'forest thinning' (or gardening) is a strategy that will deliver the State Government

much more support from the environmental community whilst still recognising and supporting indigenous knowledge holders.

There are 2 million hectares of State Forests in NSW that provide water for numerous town reservoirs, have the potential to contribute to increased tourism, and take-up and store carbon. All these real economic values will improve if logging is stopped. In 2023 FC NSW lost \$15 million on their hardwood operations, that's a cost of \$1,281 for each hectare logged. This is despite being paid \$31 million for their community service obligations that year, and obtaining millions in regular equity injections. It is in the best interest of taxpayers to stop logging of public native forests.

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

Native forest logging in NSW releases 3.6 million tonnes of carbon (CO₂e) per year, which is equivalent to the annual emissions of 840,000 cars. Stopping logging will enable forests to regain their lost carbon and make a significant contribution to meeting our climate targets. As shown by the 2019/20 wildfires, increasing droughts and fires due to climate heating are already having a significant impact on trees, forest species and rainforests, it is essential that logging is stopped to allow forests to reduce the impacts of climate heating by removing CO₂ from the atmosphere, and recover their integrity to better withstand future disasters.

There is also an increasing body of evidence to suggest that logged forests burn faster and hotter (Lindenmayer, Mackey, Zilstra). This occurs because there is always large amounts of debris at log loading sites, the sites themselves are exposed to the light and dry out, making them vulnerable, and fires burn quickly through a logged forest.

Intact native forests store significantly more carbon than logged and regenerated native forests (Keith et al. 2014). Native forest logging generates large amounts of emissions. Indeed, a key way to reach Australia's 2030 GHG reduction targets will be to stop native forest logging (<https://www.canberratimes.com.au/story/8740433/ending-native-forest-logging-key-to-emissions-reduction-experts/>). In fact, a major step down in native forest logging in Tasmania had major positive benefits on the carbon accounts in that State (Mackey et al. 2022). Increased carbon storage in intact native forests can be included in State and National carbon accounts. Carbon does not have to be traded to show benefits ' and this will avoid the gaming that has characterized substantial parts of the carbon trading industry in Australia (e.g. Macintosh et al. 2024).

The biodiversity benefits of intact native forests have been well documented (Mackey et al. 2015, Watson et al. 2018). The best way to maintain the biodiversity values of native forests is to stop logging them, including in NSW (Ward et al. 2024).

10 October, 2023

To the Independent Forestry Panel, NSW Government Review.

Dear Panel Members,

I send this submission as someone who lives on the South Coast of NSW and stayed to defend our property and to rescue native animals caught in the Black Summer fires. At that time I was a rescuer and carer for WIRES.

In the months that followed the Black Summer Fires, as I went to the unburnt edges of surrounding bushland often in State forests to distribute feed for native animals that survived the fires, I saw contractor vehicles as early as February 2020 taking what Forestry Corp NSW (FCNSW) advised me in writing were 'salvage logs' from the severely compromised forests they manage. **(Photo 1)** These same 'salvage logs' were the surviving habitat for species severely diminished in number as a result of the fires. In the Shire of Eurobodalla alone, 270,000 ha of the total 330,000 hectares was burnt. I was truly shocked that salvage logging was even sanctioned. The salvage logging was replicated across the Southern Forests throughout 2020 to the shock and dismay of residents. **(Photo 2-3)**

But in the months that followed, it was an Ecologist from Forestry Corporation NSW who pointed out to me that the harvest of native forest from the State Forests of NSW was not financially viable in its own right and was completely cross subsidised by the plantation pine operations of the Corporation. This represented both an environmental and economic travesty to me. To further learn that more than 90% of that harvested from the native forests ended up as short term use woodchip, tomato stakes, pallets or power poles (incidentally all of which burnt in the fires along the route into Lake Conjola!) was the 'nail in the coffin' from both a fiscal and an ecological standpoint. In Financial years 20/21 and 21/22 the hardwood division of FCNSW lost \$30 million. The shocking reality is that this division has been earnings before income tax (EBIT) positive since 2011. (Frontier Economics, Native Forest Logging: A growing taxpayer burden, Nov 23, p7)

Since that time 4 years ago I have made multiple trips into the forests of both southern and northern NSW under harvest or subject to harvest by FCNSW. I have been consistently shocked at the ecologically insensitive manner in which the forests are logged, at the badly disturbed and unremediated environment left behind after logging and at the poor condition of trees left in situ and not harvested because they are designated by FCNSW as habitat and feed trees (**see photos 4**), all taken in Southern NSW at South Brooman SF and Mogo SF).

Each piece of economic analysis I have read about the industry in this same period further cements my view that the industry needs to be overhauled, to derive its timber from plantation and that NSW State forests are worth more standing.

Yours sincerely,

Julie Taylor Mills

Board Member – NSW Environment Trust

Board Member – Nature Conservation Council

Resident – South Coast, NSW



Photo 1. Loaded logging truck with salvage logs from Mogo State Forest, February 2020



Photo 2 and 3: Salvage logging in the state forests around Eden in the months after the Black summer fires of 2019-2020.





Photo 4: Designated habitat tree in South Brooman State Forest near a log landing. As I understand it, FCNSW is required to retain less than 15 habitat or feed trees per hectare in site specific conditions post the Black Summer Fires. However so many trees to which H or F are painted on are in poor condition. There were logs from trees far more suited as habitat trees that were felled and piled up at the nearby log landing. April 2023



Photo 5: Log landing in South Brooman State Forest twelve months post Black Summer Fires. Directly across the logging road from this site was multi level forest which was completely untouched by fire. The fires had stormed through this side of the road which was already cleared by logging and full of logging debris. This site provided dried, excellent fuel for fire. The moist dense forest across the road was left untouched



Photo 6 and 7: These two photos were taken in the State Forests of Mogo and South Brooman in the 6 months after the Black Summer Fires. They demonstrate the environmental vandalism that occurred at a time when far greater sensitivity to the need to protect surviving habitat and species should have been adopted.