

Public submission

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

Native forest logging is indisputably unsustainable for the following reasons:

- Estimations by the Forestry Corporation of the amount of harvest-able timber is consistently over estimated.
- The yield from public native forests has declined by 40% since 2010.
- Protections for mature trees were removed in 2018 and logging was intensified to try and get more wood from native forests.
- Logging of native forests reduces biomass and carbon storage, and removing mature trees takes away valuable food sources and hollow bearing trees.
- ESFM Ecological Sustainable Forest Management principles that underpin the NSW Forest Management Framework have failed.

Of most concern is how an unethical enterprise has been left to manage forestry in NSW - 2 million hectares of forest. NSW Forestry Corporation (NSWFC) has been charged and convicted 14 times (in recent years) of crimes including breaching of their own environmental policies and guidelines; being fined hundreds of thousands of dollars. We can only imagine the number of times they haven't been caught or charged. The Judge of one such recent case stated she had no assurance or faith that they wouldn't re-offend.

Additionally, NSWFC received \$247 million from the State Govt in the last 5 years yet reported a loss of \$28 million last year, while their top executives were paid an average of \$552,000. The taxpayer is, for the most part unknowingly, funding wholesale destruction of our environment. And the State Govt asserts its confidence in them, funds it and supports its continuation. Therefore, we urge the Panel to broaden their objectives to urgently review NSWFC and to sever their access to government funding.

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

- 174 species in NSW rely on hollows for dens and nests; logging reduces the number of hollows that will survive or be created in native forests.
- Koalas will be extinct by 2050 at the current rate.
- After the fires of 2019-2020, fauna needs healthy habitat to recover.
- Logging is directly causing multiple local extinctions that leads to further impacts on our precious threatened wildlife.
- Continuing the status quo is the way to ensure extinctions and irreversible climate change.
- Native forests contain high value aboriginal cultural heritage sites and provides internation connectivity.
- Highest value food trees (for Koala and Greater glider) and ancient forests are being targeted (a recent conviction of NSWFC involved the removal of such trees).

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- Old growth forests (healthy ecosystems) become refuges for wildlife in catastrophic fire events. There is no evidence that logged forests prevent or stop fires; in fact they worsen , creating more frequent and higher intensity fires.
- Should the State Labor Govt abide by its election promise to protect and list the Great Koala Nation Park (GKNP), which is currently being intensively logged, it will only protect 1 in 5 koalas in the State. Therefore, protecting other state forests is crucial to preventing the extinction of koalas.
- The evidence is overwhelming that industrial logging is leading to extinctions.
- Cultural heritage, intangible 'living' culture exists and should remain provided within state forests.
- Connectivity for wildlife through state forests is necessary for their breeding, dispersal and survival.
- Globally significant pharmocopia need to be protected in state forests; traditional Indigenous medicines must be valued and protected.

From a local perspective, here in Port Stephens, the push for sand and rock quarries is increasing; there are currently several proposals awaiting determination, including the Stone Ridge quarry in Wallaroo State Forest, Balickera. We have argued the inappropriateness of this proposal, citing inconsistencies with existing policies, such as:

- The prospect that native State Forests could become large-scale quarries instead of sustainably managed forests being out of balance with the Ecologically Sustainable Forest Management (ESFM) principles that underpin the NSW Forest Management Framework, including the objective to 'maintain or increase the full suite of forest values for present and future generations across the NSW native forest estate.'
- Section 10 of the Forestry Act 2012 No 96 defines multiple objectives for the FCNSW which each have equal weight. These include:
- having regard for the community in which it operates.
- where its activities affect the environment, to conduct its operations in compliance with the principles of ecologically sustainable development contained in section 6(2) of the Protection of the Environment Administration Act 1991 [e.g. the precautionary principle, intergenerational equity principle, conservation of biological diversity and ecological integrity, incorporating environmental factors into pricing and valuation, such as polluter pays, full environmental lifecycle costs etc.]
- being an efficient and environmentally sustainable supplier of timber from Crown-timber land and land owned by it or under its control.

The Stone Ridge quarry in Wallaroo State Forest proposal will impact threatened species and threatened ecological communities, it will not help conserve biological diversity, and will increase the volume of heavy vehicle traffic, resulting in associated social impacts; meaning the project does not meet the existing FCNSW objectives. Large scale quarries are not a sustainable use of state forests and should not be permissible. We believe it was not the intention to for this kind of land use to be approved within state forests, but this is not the only quarry currently proposed for state forests. It seems to be an attempt by FCNSW to monetise our publicly owned state forests that should not be permitted.

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

- Private forestry is reportedly providing around 90% of high value timber products. The wood currently harvested from state forests is primarily used for low value pulp and woodchips. This is not a suitable use for our publicly owned and cherished state forests harbouring threatened species of flora and fauna.

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

- High quality engineered timbers are now available, that need to be promoted and improved. These engineered timbers/alternatives along with plantation timber are considered to be of much higher value.
- There is a great opportunity to recycle vast quantities of plastics into creating building materials.
- The Commonwealth Government can and should control the export and import of timber that is not sustainably sourced.

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

- Native Forests need to be retained as an assured carbon bank that protects the headwaters of our streams and rivers, providing clean water to all communities.
- State forests should progress into the future by moving away from low value destructive forestry operations, into providing recreation areas where future generations may enjoy nature; providing a strong bastion creating biodiversity corridors linking to national parks across the state.
- Forests may be rejuvenated and restored using Aboriginal forest management models that will provide opportunities for cultural practice and promoting cultural understanding and protecting heritage, as well as flora and fauna.

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

- Old methods, plans, policies etc, that were written in previous times, are no longer sustainable in this climate and extinction emergency.
- Native forest logging increases fire threat frequency and intensity, erosion and waterway pollution, and the penetration of weeds and other invasive species.
- Native forest logging (particularly the current trend of clear felling) reduces the function and health of waterways, including streams and rivers, leading to desertification.
- There are proven carbon benefits in stopping logging vs emissions and reduction of carbon sinks continuing with logging. It is impossible to reach the State's emissions targets and objective of stopping extinctions if the status quo continues.
- Water security; clear-felling dries out the total eco system changing water cycles (flows and quality) which impacts agriculture, native animals (including threatened flora and fauna) and human needs. Rivers emerge in forests, filtering and creating clean water. The siltation and pollution in our rivers and outlets to the sea have created a multitude of problems and knock on effects.
- By reducing emissions and slowing climate change there are economic benefits through reducing the associated costs such as food security, health costs, property and insurance and emergency services, as outlined here Compound Costs: How Climate Change is Damaging Australia's Economy | Climate Council https://www.climatecouncil.org.au/resources/compound-costs-how-climate-change-damages-australias-economy/
- Vegetation cover is crucial given that the IUCN recognise a number of species, including the Koala, as being particularly susceptible to climate change.

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- Protecting and increasing areas is native forest could help NSW meet its 30z30 commitment.

In conclusion, we must stop sacrificing our environment by logging our Native State Forests that results in worsening climate change and driving extinctions for woodchips and a few jobs when these workers may be re-trained for other more valuable and sustainable roles.