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Submission ID: 204988

Organisation: N/A

Location: New South Wales

Supporting materials uploaded: N/A

Submission date: 10/13/2024 4:37:58 PM

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

The definition of environmental sustainability is responsible management of natural resources to fulfill current needs without compromising the ability of future generations to meet theirs' (Nicholas Patterson, 'What is Environmental Sustainability'; Southern New Hampshire University Publication, 20 Sept, 2024). This implies an underlying principle than any utilisation of the natural resources under consideration is time-limited and repairable.

This is clearly not the case with Native Forest Logging. Native Forest Logging involves clear-felling highly diverse, multi-aged, complex and arguably still poorly understood eco-systems that are also remnant refuges for many identified threatened and endangered species (for example, koala, greater glider, yellow-bellied glider, brush-tailed phascogales, eastern pygmy possums, glossy black cockatoos, spotted tail quolls and others). Two hundred and sixty nine native species are now listed as threatened or endangered in NSW (State of the Environment, DCCEEW, 2022I) with the unescapable and no doubt uncomfortable reality that one of the principal drivers is habitat destruction and fragmentation (NSW State of the Environment, NSW EPA, 2022). This level of habitat destruction and fragmentation is not repairable in any time-frame that makes scientific sense for the animals and plants that need multi-storied, multi-aged and complex eco-systems to survive.

On the 17th of July of this year, Environment Minister Penny Sharpe stated 'We cannot ignore the truth: biodiversity in NSW is in crisis' and made a commitment that 'Our goal must be to leave nature better off than we have found it.' (NSW Government Ministerial Release, Department of Climate Change, Energy, Environment and Water, 17 July 2024.

Yet the Minns Government appears to want to have it both ways, particularly in regard to the some 10 different state forests supposedly of high enough biodiversity, including threatened species habitat, to be included in the promised 'Great National Koala Park' but nevertheless currently or destined to be logged at an industrial level by the State-owned and therefore Government directed Forestry Corporation. Three readily available examples, known to be homes for koala, greater gliders, brush-tailed phascogales, squirrel gliders and part of the migration range for grey-headed flying foxes are that are currently being logged are Kiwarrak State Forest, Bulga State Forest & Styx State Forest. .

Native Forest Logging is not sustainable. Australia and NSW in particular are currently world leaders in habitat destruction and vulnerability of native species extinction. Promises of protection and 'Nature Positive' in some future time frame while habitat is destroyed in the interim is at best naivety and ignorance of scientific evidence or, at worse, a cynical exercise in green-washing.

Biodiversity is in decline now, and potential threats of further climate exacerbated catastrophes such as bushfires and floods, plus ongoing threats of feral species invasion and diseases make healthy biodiverse remnants even more worthy of protection. The Henry Review (Independent Review of the Biodiversity Act, August 2023) argued in the clearest and strongest terms that there is a need for both immediacy and primacy if biodiversity loss and the extinction crisis is to be averted.

Hollow-bearing trees are a case in point with over 174 species of possums, gliders, owls, parrots and other animals and invertebrates dependant on hollows, some requiring multiple hollows over a substantial territory. Current individual hollow-bearing trees may be protected in some Native Forest Logging however the removal of trees that will develop into hollow-bearers in future years is short-sighted at best and catastrophic if the few remaining trees meet any form of misfortune. Typically hollows do not form in trees that are less than 100 years old (Natural Tree Hollows, Essential for Life, Factsheet 5: (1999) NSW Environment & Heritage). Leaving isolated hollow bearing trees whilst clearing the complex eco-systems around them is not sustainable logging. Native animals and birds are territorial with many having short-life spans and limited time to find territories and mates and breed. Forestry Corporation appears to operate on the principal that if native animals and birds are not immediately killed in the logging process they will disperse and successfully find alternative territories in time to mate and breed. However displacement causes native species high levels of stress and leads to increased vulnerability to later injuries and death from malnutrition, predation, adverse human contact for example motor vehicle strikes and territorial conflicts. There is also an assumption, of course, that alternative refuges, territories and food sources are to be found within a reasonable range. The mere presence of loud machinery and humans can cause significant stress and disruption to many native animals with such stress increasing vulnerability to range of diseases such as chlamydia in koalas. Because Native Forest logging disrupts vegetation upstream and beyond the immediate riparian zone it also impacts on the health of streams and rivers for aquatic species by increasing erosion, sedimentation and storm damage vulnerability which in turn has adverse impact upon aquatic species such as the platypus and as yet poorly researched and understood rakali. The complexity and biodiversity including soil and fungi in native forests is still poorly understood although in 2004 it was estimated that some 16,532 plants and 3,817 animal species were identified as forest-dependent and more expected to be identified as further research and understanding developed (Dept of Agriculture, Fisheries & Forestry, Australian Government 2004).

Destroying complex eco-systems, or simplifying them through 'thinning' or 'gardening' carries a very high probability that biodiversity will be substantially degraded without a true understanding of the damage done or what is lost. Simplified eco-systems are also more vulnerable to disease, pest and weed invasion and more intense bushfires (Lindenmeyer, D.B, Yebra, M. Carey, G., 2023 'Logging elevated the probability of high-severity fire in the 2019-2020 Australian forest fires'. Nature Ecology & Evolution, 6 533:555).

Of course, one of the strongest arguments against the sustainability of Native Forest Logging is that it is not a sustainable economic model because of its heavy reliance on substantial taxpayer subsidies to operate. According to Frontier Economics (30 May 2023) Forestry Corporation provides poor financial returns with hardwood harvesting in particular unlikely to meet costs. The Sydney Morning Herald in March 2022 reported a loss of \$20 million with an estimation of \$441 per hectare by Forestry Corporation whilst the Nature Conservation Council estimated that it had received over 250 million dollars worth of grants from the State and Federal Governments. It is again noteworthy at this point that these are habitat rich forests of redgum, ironbark and cypress and their surrounding complex vegetations that are being logged largely for woodchip and paper pulp exports plus firewood (Department of Agriculture, Fisheries & Forest, 2023, Australia's State of the Forest Report, Canberra, Australia., Australian Bureau of Agriculture & Resource Economics and Sciences, Canberra, 2021., Lindenmeyer, D.B. & Taylor, C, 'Diversifying forest landscape management , a case study of a shift from native forest logging to plantations in Australian wet forests, Land 11:407).

It is also notable that Forestry Corporation's record of abiding by lawful requirements, including preserving important hollow-bearing trees and exclusive zones is at best woeful, at worst criminal.

Reportedly Forestry Corporation has a record of several incidences with 7 at a criminal conviction level over the last five years and fines of over a million dollars with several other illegal actions also under investigation. Reported the Land and Environment Justice who heard the matters expressed little confidence that Forestry Corporation were remorseful of these actions that demonstrated a pattern of disregard (ABC 24/7/24., Lisa Cox, The Guardian, 31 July 2024). Native Forestry Logging is not sustainable because of its history of repeated illegal breaches and the organisation that should be effectively policing them, the Environmental Protection Agency is under-resourced and underfunded. Instead, community activists groups, motivated not by self-interest but care for threatened and endangered species, and by being forced to witness the tragedy of industrial level biodiversity destruction. are left to bring the matters to the attention of EPA but are themselves likely to be charged with criminal charges of trespass.

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

Australia is acclaimed in the global community for its unique animals and rich biodiversity. Nature-based tourism reported adds to the country's income by a lucrative 20 billion per annum with 'koala' tourism alone reportedly worth 3.2 billion and employment for over 30,000 people. (National Parks Association).

This is evidence that that threatened species and their forest habitats have cultural value not only for Australia but internationally as well. The collective grief and horror engendered by the destruction of the Black Summer fires wherein images of burnt and distressed animals and blackened barren landscapes brought in millions of dollars of donations from around the world and evidence of the profound importance that native forests and threatened species hold in the collective consciousness.

Yet these many species, including the Koala, are dependant on intact and biodiverse healthy forests to survive. Habitat destruction and fragmentation are the nemesis of 'Nature Positive' or even 'Less Nature Negative'. Of note is by Government predictions, the Koala will be extinct in the wild in NSW by 2050 directly as a result (NSW Department of Environment & Heritage). As part of its election sales-pitch, the Minns Government made commitments to the creation and protection of the Great Koala National Park with the objective to proactively reverse this drive to extinction. This no doubt was significant in their election success. However, the current community outrage at the intensive logging of forests identified to be part of the Great Koala National Park (Nature Conservation Council June 28, 2024 Press Release) is also evidence of the cultural significance that ordinary Australians, those not directly profiting from Native Forest Logging, place on our intact forests and the grief at their loss.

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

Plantation forests are already a viable source of timbers for housing, construction, mining and retail whereas Native Forest Logging mostly ends up as woodchips and paper pulp (Department of Agriculture, Fisheries & Forest, 2023, Australia's State of the Forest Report, Canberra, Australia). Essential Energy's shift away from using power poles harvested from native timbers is yet another example of the decline in market demand for native timber. Other states and countries have successfully transitioned away from native forest logging for timber products and NSW should do the same. Plantations on pre-existent cleared land are to be encouraged as the sustainable and carbon positive resource for timber products that is sustainable.

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

As stated above, the future of Forestry must be softwood and hardwood plantations whilst Native forests, with their critical value as refuges threatened and endangered species must be preserved and enhanced to reverse the drive of the extinction crisis.

Logging, 'thinning' or 'forest gardening' all degrade flora and fauna richness and complexity thus increasing the vulnerability of eco-system collapse and worsening extinction crisis. Any significant degradation of the biodiverse complexity opens forests to disease, invasive pest incursion and more intensive bushfire risk (G.J. Murray C. Everett, & D.B Lindenmeyer 6 Sept 2024, 'Logging by another name -forest gardening, perils and irritations).

Plantation Forests provide more employment opportunities in terms of for weed and feral species management mitigation of fire-risk, recreational and tourist values and carbon credits and therefore a more robust industry going forward.

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

Australia has a history of resisting the termination of Nature destructive industries with dire and catastrophic predictions of economic loss, loss of jobs and collapse of communities. Obvious examples are the end of Whaling in the 1980s and the end of the Koala Fur Trade which saw hundreds of thousands of koalas snared and skinned to make cuddly 'koala' toys, hats and gloves in the early 1900s. In both cases, the threatened dire consequences proved unfounded with new nature-based tourist industries far eclipsing in economic and social benefits (Whale watching tourism reportedly is worth over 2 billion dollars to the Australian economy and as cited above, koala tourism 3.2 billion, and both provide local jobs and support local communities and businesses).

Unlogged State Forests already provide a range of positive outcomes and benefits to communities including recreational use. One example, mountain bike trails in Kiwarrak State Forest bring riders and their families from the immediate and broader communities with money spent in the local villages, however this too is currently being logged despite community outrage and support for its preservation).

Other recreational activities such as bush-walking, horse-riding, camping and 'forest-bathing' bring visitors and tourists to intact State Forests and add economic and social benefits to local communities. Positive psychological benefits are well documented from being in natural environments (Weir, K., April 2020 'Nurture by Nature', 15 (3) American Psychological Association). National Park camping grounds are often overbooked during holiday periods and do not allow pets. Grey Nomads, often travelling with pets, have boosted regional economies some 97% in 2022-23. State Forests could be more successfully utilized to these ends whilst still providing high-end timber products in the longer term (The Grey Nomads.com.au August 9, 2024). The well-researched and comprehensive Henry Review of the failure of Biodiversity offsets stressed the importance of nature positive as crucial to underpin future economic growth and well-being as well as being an environmental necessity (Henry, K., Keniry, J., Leishman, M., & Mrdak, M. 'Final Report of the Independent Review of the Biodiversity Conservation Act 2016, August 2023, State of NSW and the Department of Planning and Environment').

The Great National Koala Park, if preserved and protected with immediacy, promises further local and country wide economic boosts through Nature-based tourism and supporting businesses. Retraining of Forestry Corporation workers as forest rangers, tourist guides, and care-takers is viable and achievable. Service businesses could also thrive and be able to employ more staff. Indigenous tourist-based businesses such as bush foods and medicine education, cultural events

and education could also be boosted as well as Aboriginal knowledge sharing on cool bush-fire hazard reductions.

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

Climate change is the major threat of our time to human and natural systems alike with predicted more extreme weather events and bushfires already upon us. The challenge of keeping global warming below 1.5 degrees is looking increasingly unlikely. Logging complex biodiverse rich Native Forests for woodchips and paper pulp substantially increases carbon emissions. Preserving them intact allows them to continue to be carbon sinks.

By contrast, the planting and harvesting of fast-growing plantation trees on existent cleared land is carbon positive and could be incorporated into carbon markets.

Healthy diverse and complex native forests with multi-layered thick canopies keep soil damper and weed infestations that increase bushfire risk lower as proven in the Black Summer fires. Such forests also offer the best habitat and refuge for wildlife and thus have potential as consideration for biodiversity markets.