

Public submission

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Submission regarding the sustainability of current and future forestry operations in NSW

Dear Independent Forestry Panel

The Nambucca Valley Conservation Association recommends that logging in NSW public native forests ceases as a matter of urgency and that instead these forests be protected and managed for the conservation of the many values they contain and ecoservices they provide for the people of NSW.

We believe that any Forestry Industry Action Plan should be based on facts, achieving ecological and economical sustainability and be focused on a plantation based industry, especially in the light of climate change.

We offer the following comments to support our strong opinion that current **management of our public native forests is environmentally and economically unsustainable** and that our forests are worth far more to NSW left standing in perpetuity.

1. Sustainability of current and future forestry operations in NSW

- The NVCA has campaigned for ecologically sustainable native forest management since 1981.
- For decades this Association’s serious concerns regarding ecologically unsustainable native forest management have been ignored by various NSW governments. Over allocation of timber in the Wood Supply Agreements, over estimations of available timber by NSW Forestry Corporation, intensification of logging, weakening of environmental protections, clearly declining forest health and worsening status of forest dependent threatened species such as the koala, forest gliders and large forest owls, have fallen on ears far more interested in resource extraction at any cost than long term healthy diverse native forests.
- Our public native forests are being flogged with complete disregard for the important values they contain and services they provide to NSW.
- Our members have observed NSW public native forests being logged with ever increasing frequency with clear-felling common place now. Intensive logging using modern harvesting machinery is extremely damaging. Apart from destroying habitats of forest dependant species, it leaves vast areas of denuded forest floor exposed to the elements and primed for sediment transport, weed invasion and bushfire. Post logging, we regularly observe careless damage to the few remaining trees and root zones from logging machinery. This damage compromises these tree’s ability to thrive or reach maturity. This is unsustainable forest management. These areas

will take many hundreds of years to recover to healthy biodiverse forest ecosystems and even then, are unlikely to return to the same species and age structure mix that existed pre-European exploitation.

- Forestry Corporation have routinely overestimated the timber available to harvest. Timber yields have declined by 40% in State Forests since 2010 from 1.3 million tonnes to 0.8 million tonnes in 2023. Yields are currently only 61% of claimed sustained yields. The enormous loss of native forest cover in the 2019/20 fires has (unforgivably) yet to even be considered in yield estimates, such is Forestry Corporation's disregard for sustainable forest management.
- In 2018, the Coalition state government removed protections for mature trees and allowed intensification of logging in an attempt to get more wood from native forests to meet the wood supply agreements. This is not sustainable practice!
- Public native forests in NSW are getting younger and younger as logging intensifies with smaller and smaller trees being considered high quality sawlogs now, because that's all that is left.
- Old growth trees are now a rarity in our forests and are crucial for the survival of large hollow dependent forest fauna like the Southern greater glider, Yellow bellied glider and Powerful owl and yet they are still being logged, often illegally by Forestry Corporation contractors. Despite all the timber industry rhetoric, there is nothing environmentally sustainable about NSW native forestry on the contrary, it is driving species extinction, downstream pollution, BMAD, forest weed invasion and making our forests more fire prone.
- Native forest logging is not only environmentally unsustainable, but also economically unsustainable, with Forest Corporation incurring multimillion dollar annual losses for many years now. We are aware that NSW Forestry Corporation lost \$15 million on their hardwood operations in 2023 and can only remain operating thanks to heavy cross subsidisation from the lucrative plantation sector and multiple NSW government grants. In 2023 Forestry Corporation received \$31 million for its community service obligations that year, and millions of dollars in other government support. This situation is a disgrace. In effect, NSW taxpayers are paying to have their public native forest estate, their natural assets, destroyed and degraded. This fiscally unsustainable situation has persisted for decades and should end now. This is why the NVCA strongly supports an immediate end to public native forest logging and a swift transition of the 9% of the timber industry it represents into the plantation sector, to create a 100% plantation based industry.
- Frontier Economics conclude it is time to plan for an orderly exit from Native Forest Logging stating there is strong evidence that the budgetary burden of subsidising NFL operations in NSW is significant. At the same time, there is far less community acceptance of the widely reported environmental damage associated with NFL, including loss of remnant forest and native animal populations¹.
- Forestry Corporation has a long and shameful history of breaches of environmental protection rules in public native forests, with environmentally damaging results and on the occasions it has been fined, it is the taxpayers who pay. This is economically unfair and unsustainable.
- Native forest logging should end now and instead our public native forest estate should be protected, rehabilitated and allowed to grow and mature naturally and in perpetuity, for the benefit of all.
- Timber workers directly affected by ending native forest logging should be supported with a fair and just transition package.

¹ Frontier Economics (2023). Public native forest logging: a large and growing taxpayer burden

- Logging public native forests is an obsolete industry which struggles along surviving on subsidies. Moving to a plantation industry would provide timber workers with certainty and a sustainable future.

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

- The well documented decline of many forest ecosystems and forest dependant species, including threatened species such as the Koala, Greater glider and Yellow-bellied glider, is a direct result of the logging and destruction of their habitat. There are 174 species in NSW that depend upon old growth trees for dens and nests. Our public native forest estate should be protected to hopefully turn around their trajectory toward extinction and enable their recovery.
- Logging directly impacts on 150 forest dependent threatened species in NSW. The NSW government has a responsibility to stop the destruction of threatened species habitat and but instead it is condoning its ongoing demise, for a relatively small number of jobs that could and should be transitioned into the public plantation or national parks sector.
- The hardwood forests of north-east NSW are increasingly suffering from a form of dieback called Bell Miner Associated Dieback (BMAD)² It is evident across the NSW forest estate and is a direct result of logging, canopy openings and lantana invasion post logging. Dense lower and mid storey vegetation benefits bell miners. Once the miners have moved in, taking advantage of the degraded forests and lantana understory, it is only a matter of time before the remaining eucalypts die off due to exploding populations of sap sucking psyllids which the bell miners ‘farm’. This situation is a monumental failure to manage our public native forest estate sustainably and with future forest health in mind. Of the 1,000,000ha of potential BMAD areas covered by ariel survey over NSW forested lands by DPI between 2015 and 2017, 25,000ha were identified as suffering BMAD.³ Many of the affected areas were within State Forests.

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

- NSW timber needs can be met by plantations which already provide 91% of Australia’s log production.
- Many new and innovative products are replacing timber in the building industry. Treated timber poles will no longer be used for new power pole installations in NSW, due to more sustainable, resilient and fire resistant options being available.
- Plantations should be managed to ensure adequate supply of products that meet various and changing demands.
- 50% of hardwood timber logged from public native forests is exported as woodchips. This low value use of such a rare and valuable resource should stop immediately.

² <https://www.environment.nsw.gov.au/vegetation/bellminerdiebackstrategy.htm>

³ Silver, MJ and Carnegie AJ (2017) An independent review of bell miner associated dieback. Final report prepared for the Project Steering Committee: systematic review of bell miner associated dieback.

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

- The NVCA opposes the constant conversion of native forests into plantation by Forestry Corporation and its predecessor identities NSW State Forests and Forestry Commission NSW. We support a plantation based timber industry but not plantations created by logging existing native forests first⁴.
- We do not support commercial logging of private native forests and instead would prefer to see a complete reliance on softwood and hardwood plantations for the supply of wood products in NSW.
- We do support private forest owners being able to remove limited selected timber strictly for on-farm use eg bridges, fence posts and construction, however this should not involve the removal of any koala or glider feed tree species, glider den trees or hollow bearing old growth trees.
- Our Association also supports the expansion of the plantation sector to meet growing demand, provided that any new plantations are established on previously degraded or open lands and not by clearing or converting of any public or private native vegetation.
- The money saved by not having to prop up the loss-making Forestry Corporation Hardwood Division would be better spent purchasing appropriate land to establish new plantations.
- Incentivising private investment in timber plantations would also assist in meeting future demands.
- Cost-benefit analysis modelling found that ending native forest logging in 2023–24 instead of 2039-40 (the date that the North East Regional Forestry Agreement is currently scheduled to expire), and instead utilising the land for carbon sequestration and tourism will deliver a net benefit valued at \$45 million in present-day dollars.⁵

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

- State Forests are vital for the provision of ecosystem services such as atmospheric carbon storage and sequestration. If logging stopped, their capacity to draw down and store atmospheric carbon will increase for the benefit of everyone. This will also help NSW reach its emission reduction targets.
- State Forest play a vital role in catchment health and if left to recover from years of unsustainable logging practices, will deliver increasing amounts of clean water to downstream water users for town water supplies and agricultural and domestic use in rural areas. Young forests are very thirsty but as forests mature they release more water.
- Forests generate rainfall, cool the land and clean the air. State Forests capacity to deliver these important eco services will increase if logging stops.

⁴ Pugh, D (2022) Converting Native Forests to Plantations.

⁵ Blueprint Institute (2023). Branching out - Exploring Alternate Land Use Options for the Native Forests of New South Wales

- All native forests within State Forests should be gazetted as National Park, Nature Reserve, State Conservation Area or Regional Park under the *National Parks and Wildlife Act*.
- We would support joint management of our public native forest estate with First Nations people but not sole Aboriginal management of any newly created national parks and reserves, resulting from the ending of public native forest logging.
- Healthy intact native forests are much more attractive to tourists who do not want to see trashed and degraded landscapes, nor meet logging vehicles on narrow roads. Tourists want to know they can return to their favourite forest areas knowing that they will still exist, unlike visitors to State Forests subject to logging operations.
- Tourism has the potential to contribute significant employment and economic benefits to local economies far beyond that of the comparatively small number of direct jobs in the public native forest timber industry. Recreational uses of public native forest are huge: health and fitness, bushwalking, wildlife observation, nature appreciation, trail bike riding, horse riding, Aboriginal Cultural tours, guided nature/camping tours, 4WD activities, volunteer forest restoration holidays. Over a 15 year period, the Great Koala National Park would create 9,800 regional jobs generating \$330m in wages and \$273m in capital and operating expenditure. It would also generate \$412m in tourist spending within the Coffs Coast region.⁶
- The Great Koala National Park proposal on the Coffs Coast is a perfect example of an environmentally and economically sustainable alternative use of our natural asset and one that is widely popular and supported by individuals, the business and tourism sectors and local governments. In fact, it appears that the timber industry and its employees are the only ones not supporting the creation of the Great Koala National Park.
- Protecting public native forests in perpetuity is a far more economically and environmentally sustainable use of our natural asset, it is what the NSW public wants, and it is what the mountains of expert evidence recommend. It is astounding that logging has been allowed to continue for so long in public native forests in the face of strong public sentiment and clear proof that it is unsustainable.

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.**

- Scientists have said for many years that ecologically intact forests play a vital role in sequestering and storing atmospheric carbon and addressing climate change. It makes no sense to remove any more of our remaining public native forest, when it is providing such a critical function.
- Native forest logging in NSW releases 3.6 million tonnes of carbon annually and has reduced our States Forests storage capacity by more than 50%. Native forests should be seen as a significant and critical component in addressing the threat of climate change. They should be protected from any further logging to enable them to recover their capacity and help buffer us from future climate disasters such as droughts, fires and floods.

⁶ Hunter Research Foundation (2021). Great Koala National Park - Economic impact analysis and environmental benefit assessment Final Report.

- The NVCA has no confidence in the current carbon and biodiversity trading schemes and is concerned that including protected public native forests will enable carbon emitting industries to continue or increase their polluting practices.

In conclusion

Native forest logging is outdated and irresponsible in these times. Changing old ways is rarely easy, but if governments had not shown the wisdom of moving forward for the benefit of all and in response to changing public expectations, then we would still see unacceptable industries such as the seal fur trade and asbestos mining and manufacturing.

Ceasing logging in NSW public native forests is a change that is long overdue. Logging public native forests has not had a social licence for decades and the timber industry and NSW government needs to accept that native forest logging is no longer appropriate, acceptable or right.

The NVCA concludes that public native forestry in NSW is unsustainable and should cease immediately. Public native forests should be protected as National Parks, Nature Reserves, State Conservation Areas and Regional Parks and managed jointly by NSW government and Aboriginal traditional custodians. Timber demands should be met by softwood and hardwood plantations.

Yours sincerely

Carol Margolis
NVCA Secretary