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

Modern forestry is currently fossil fuel dependent, so is not sustainable. Whilst regenerating or replanted trees soak up carbon and may offset emissions associated with all aspects of forestry, they don't and can't offset all associated emissions - just CO2. If you include soil carbon in the equation, native forestry and some plantations look like poor outcomes. Whilst a shift from fossil fuels to electric vehicles is happening, it is costly and seems unlikely to occur in the economically marginal forestry industry, some of which operates in situations where electric vehicles/machinery may be unviable for some time.

Sustainability is a concept from the 1980s when it was fully termed Ecologically Sustainable Development. It largely never eventuated in practice. There is now a move away from it and towards Nature Positive as a substitute. It seems difficult or impossible for forestry, plantation or native, to be Nature Positive. An exception might be where land already cleared for grazing or perhaps mining, can be converted to plantations of non-invasive species that can produce a timber yield whilst also providing better wildlife habitat and water quality than most forms of agriculture.

Logging of native forests is now so intensive that it is inherently harmful to values such as biodiversity, carbon sequestration, and water quality. It is very different to highly selective logging over long rotation periods. In some areas, it is primarily for pulp wood and other low value products that don't justify the harm done. Intensive native forestry reduced biomass initially, but is often followed by dense regrowth in situations that increase vegetation flammability, deplete ground and surface water, and may take decades to recover to anything resembling a natural structure.

Forestry in my area is entirely plantation pines. These are invasive species that harm native forest areas in and beyond the State Forest, and are not subject to adequate controls. Staff do some suppression and do assist volunteers to deal with wildlings, but in a commercial operation, it should not be up to volunteers to manage wildlings. FC should do it or pay contractors. There is some potential for FC to be sued over its pines escaping into private land, or at least sent the bill to have those feral pines destroyed or removed. I've not understood why, with all of the selective breeding that is done for pines, FC hasn't opted for a sterile or at least very low fertility variety that doesn't produce seeds or very few that are viable. This would reduce their weediness, but also allow them to put more resources into timber production rather than unhelpful reproduction. Parts of my area have been polluted by feral pines, admittedly not all from State Forests, and during the last wildfire, fire services refused to send crews down roads and trails infested with pines because they were considered too high a risk of explosion. The State has never dealt with the problem of invasive pines and this problem has been damaging to the reputation of plantation forestry. If pine plantations are to continue, the State and private operators should deal with wildlings and ideally switch to cultivars that have low or no reproduction.

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

This is very variable, as some forests have much higher values for these attributes than others. Some State Forests have very high value for threatened species and communities, and some of those areas are in Flora Reserves. Some Flora Reserves are now managed by the NPWS under a strange model that is a result of political wrangling by the former State Government. But NPWS has done a great job (in my area at least) of managing those areas, which now have better protection of biodiversity and Aboriginal cultural heritage values, but are also safer for the public to use, have functional fire trails that are better protected from recreation vehicle misuse, and are also better interpreted through signage and maps. Previously, those areas were neglected by Forestry Corporation because they couldn't be logged, so were seen as a liability, not an asset. FC isn't funded to manage conservation values like that.

In my area, most of the native forest within State Forest tenure is now managed by the NPWS, with better results. There is scope for more of this to occur but the current government seems to be blocking the process, even when it has no impact on associated plantation forestry, and even in known koala habitat.

In native forests still open to logging, threatened species seem to often come under attack from poorly conducted surveys, inadequate buffers, and outright negligence, some of which has been successfully prosecuted. FC has, as the Court says, a poor compliance record on a range of environmental measures. It is a failed model, though it did improve once corporatised, but only by some measures. You only have to look at the number of threatened species that are dependent on forests and on tree hollows, to see how potentially important State Forests (native) are for the recovery of those species. Logging has and continues to harm those species, despite claims of good practice. Surveys pre-logging have been shown to be inadequate in some cases, and FC has a conflict of interest when it has to design and conduct surveys that constrain its operations. It is all too easy for subtle or direct pressure to be applied to staff or contractors to do deficient surveys rather than thorough work. At present, the 'fox' surveys the 'hen house' and decides what it can take and how. This isn't credible. There should have been an agency established to regulate native forestry in a way that entails proper surveys, effective buffers, and appropriate logging regimes. FC is so under-resourced that it can't manage even relatively small Flora Reserves in some cases. Some staff want to do a better job but lack the funds to do the work and employ the staff. I suspect that all Flora Reserves need to be either managed by the NPWS or transferred to NPWS tenure as reserves under the NPW Act.

I don't know how Aboriginal heritage values survive in native forestry, but I suspect that thorough surveys aren't conducted before logging, and of course, most State Forests have been logged before, so some values have likely been lost through those earlier processes.

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

Demand for timber in some form is likely to grow due to increasing population, driven largely by immigration that is used to prop up a simplistic growth economy model. Timber products can be a better option than some alternatives but it seems difficult to sustain production without various subsidies that inadvertently support some harmful operations. Perhaps the private sector could do it better, but only if properly regulated and if there is appropriate political distance between them and the government that is supposed to regulate them. I've seen corporate plantations in Victoria and most of what I observed entailed poor practices in steep terrain that was never suitable for forestry. But the future of forestry seems to be in plantations, not in native forests, and if designed and operated well, they can be the lesser of several evils. The high cost of some

native forest products seems to be undermining demand and making plantation equivalents more favourable.

Native forestry seems to be in crisis due to over-cutting, with potential yields diminishing to the point where there would be major gaps in supply irrespective of any environmental interventions. The fact that protection for mature trees was removed in 2018 says a lot, as does the on-going harm to habitat of hollow-dependent species. The RFAs have been a failure, and we seem to need to follow the example of WA, Victoria, and SE Queensland by ending native forest logging, or at least dramatically reducing it before it collapses by consuming its own resource faster than it can regrow.

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

I live in an area where there is no longer native forestry, only Forestry Corporation plantations of invasive Radiata Pines. Even with State subsidies, these plantations seem to be barely viable. There are few staff to manage them, and too few funds to maintain access roads or manage access to exclude inappropriate use. A former FC manager believed that these operations were so economically marginal in their current form, that the State was likely to privatise them or at least lease them to private operators.

Private native forestry is feasible in some situations, but requires very good regulation to prevent it being exploitative. There are regrowth forests where some thinning can be ecologically beneficial whilst still producing a decent timber yield. But getting that right requires expertise and good oversight.

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

State Forests can provide some services that conservation areas can't, and this can be useful in meeting some of the demand for e.g. particular recreational pursuits. But some of those activities are harmful even within pine plantations, so we need to consider whether they should be allowed at all, especially when they damage fire trails and generate significant associated costs.

Plantation forestry certainly produces some important economic products, but it can also come at great environmental cost in terms of clearing or invasion of threatened species (and communities) habitats, and dramatic fluctuations in groundwater and surface water regimes. We certainly shouldn't be allowing clearing for plantation forestry, and it looks like native forestry's time is up on several measures. Plantations on already cleared land look the best option.

Aboriginal management of fire regimes may be beneficial where we know enough about those methods. There is a lot of generalisation about 'cultural burning' being good but there is a lack of information about it in areas where Aboriginal culture was highly disrupted by colonisation. What works in northern Australia where culture and landscapes are more intact, may not be suitable in southeastern Australia in different climates and habitats. But I'm supportive of more exploration in this field, and I've seen a lot of bushland that needs more frequent but less intense fires rather than being left unburnt for decades, only to degrade or burn too hot in a wildfire.

Governments tend to have economically rationalist values, whether Labor or Coalition - it's just a matter of degree. Yet both maintain market distorting subsidies for forestry, especially State-owned forestry. This is contrary to their general orientation and is more about propping up marginal or non-viable operations to buy votes. This is not in the public interest, but some sorts of subsidies for plantation establishment on cleared land may be supportable.

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

Plantation forestry seems to have potential to generate additional income through carbon credits, and perhaps from biodiversity credits (though the latter is likely to be very limited). Native forestry seems to operate in the opposite direction in terms of carbon and biodiversity credit potential, with rare exceptions such as genuine thinning operations in dense regrowth where a failure to intervene effectively would see a reduction in biodiversity values, and increased risk of destructive fire.