

NAME REDACTED

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

Forestry activity in NSW is sustainable as evidenced by the long history of forestry operations in the State and the continuous supply of timber that has resulted. Provided the harvesting of timber is sensibly regulated there is no reason to be concerned about the long-term ability of NSW forests to regenerate from harvesting events and continue to supply timber long into the future. Importantly, timber harvesting has at no point been directly responsible for the loss of native species as a long-term forest cover is maintained through regeneration of harvest areas. Repeated harvesting events in NSW forests over the last hundred years or more are evidence of this. Indeed, some areas of forest where operations in the post war period approximated clearfelling now comprise healthy stands of eucalypt forest where species listed in threatened species legislation are frequently found. Recent areas of forest earmarked for the Great Koala National Park are further evidence of this with Koalas occurring in forest subjected to repeated timber harvesting events.

The post war, intensive harvesting, that took place in various forests in the Wauchope region now support some of the State most productive forests in Australia. These forests have formed the backbone of the sustainable timber industry on the NSW north coast. While there has been criticism from certain stakeholders of 'industrial logging', the planned harvesting events are nothing more than a temporary disturbance in small areas of forest across a much larger landscape of forested land. There are short term impacts, and the operations don't 'look pretty', but they are managed with key landscape elements maintained to ensure that flora and fauna values are not compromised, and they yield significant volumes of hardwood timbers they are used in all manner of construction from structural timbers to high quality cladding and decking along with being vital as power poles for utilities. There is no more sustainable industry in NSW. Further expansion of the National Park estate is doing a disservice to the people of NSW through reduced availability of timbers that need to be sourced from further afield, from overseas or there is direct substitution to concrete and steel products all of which increases the carbon footprint and makes no logical sense.

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

State forests contain all the abovementioned values and maintaining those values is not incompatible with sustainable and sensibly managed native forest timber harvesting operations. By spreading the impact of harvest operations in space and time, operations can essentially mimic natural disturbance events like fires and windstorms. Combining this with landscape protection measures, the short-term impacts of a harvest event are minimal in the context of the very large areas of forest not harvested, much of which is permanently protected already in the 8 million hectares of National Park established in NSW.

It could be argued that the consequences of 2019/20 fires were several orders of magnitude greater than the combined effect of harvesting over the last 100 years due to the widespread and contiguous nature of the impacts. Effective timber harvest activity managed by a knowledgeable

and experienced forestry agency could be part of a long-term strategy to mitigate the impacts of climate change in the future. Certainly, sustainable timber production, utilising a carbon neutral product, is a better option than high carbon emitting alternatives like concrete and steel which will only exacerbate climate change.

Aboriginal cultural connections with country go back thousands of years. During that time forests have undergone many changes through fires, storms, and changes in climate. The Aboriginal connection to country is not diminished by those changes, in fact cultural burning practices are very likely to have been instrumental in bringing about significant changes to the landscape. Forestry impacts that are sensitive to areas of significance will have no impact either. Consultation with community and engagement on land management practices offers a unique opportunity to improve Aboriginal connection to country in a way that passive land management does not.

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

Australia is a net importer of timber products. Given the large areas of forest we are lucky to have, there are questions to ask about the import of timbers from certain jurisdictions where land management practices are less well regulated. Is it a moral position to take to import timber from less well-off countries so they we can avoid harvesting timber from our own forests?

In terms of the domestic need for timber, there can be no question that there is strong demand for Australian hardwoods. They have many valuable properties that support nation building activities from wharves, piers, decking, cladding and in support of utilities as power poles. In the case of the latter, due to a lack of recent supply, there is already substitution of composite and concrete power poles into the market. It really defies logic to use a non-renewable, more expensive product that increases carbon emissions when the sustainable alternative is readily available within our public forests.

For examples of the use of Australian hardwood, look no further than the inside of the Opera House and the wharves and decking of Circular Quay and Darling Harbour. All the wharves in the area have decking largely sourced from the north coast forests and the piers from Turpentine trees. The latter trees grow extensively on the north coast, but nowhere better than the sandstone areas north of Sydney where they have been sourced for generations. Due to the unique properties of Turpentine to absorb silica they are inherently resistant to marine borers and unequalled in durability. Again, declining supply due to a gradually diminishing industry means substitution to less environmentally friendly alternatives is inevitable without greater support of the industry.

For lower grade products, such as mining timber, fence posts, and pallet, again there is strong demand on all fronts. All goods moved around the country are moved on pallets. With the current timber shortages due to cessation of native harvesting in Victoria, pallet timbers are currently being shipped huge distances all around the country to meet the supply shortfalls. Again, this makes no logical sense when the sustainable option is sitting on our doorstep – it just needs appropriate support and regulation to enable these industries and NSW to prosper.

Another point to consider is the competitiveness of our timber industries. Increasing cost pressures are occurring everywhere, but disproportionately in areas of insurance, fuel and in costs of spare parts and maintenance. This combined with increasingly complex regulatory requirements for native timber harvesting is resulting in cost increases that reduce competitiveness with alternative products. Arguably the increased regulation on native forestry has not achieved a single thing regarding environmental outcomes other than to increase complexity, administration, and cost. The Tasmanian model of a Forest Practices Board that oversees forestry activity is a good model and should be explored for application in NSW.

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

Hardwood and softwood plantations make up part of the supply picture in conjunction the private native forestry. However, neither hardwood nor softwood are currently sufficient to meet the long-term needs of NSW and there are significant barriers in establishing new largescale plantations, largely the cost of suitable land. Short of a very sizeable contribution from Government, it is unlikely plantations can replace the timber sourced from native forests. Moreover, the diversity of species, used in niche situations such as marine piles, can not be replicated from plantations. In this way, native forests offer a unique resource that can supply myriad different end uses that will be very difficult to replicate in plantations.

The private forests also play a part in the supply picture with many private sawmills reliant on this supply. Again, private native forestry also has a long history in the state, and with sensible regulation there is no reason it should not continue. It too can play a part in the bigger picture of timber supply alongside conservation of nature given the right legal and policy settings.

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 play part of the role in delivery of benefits to the people of NSW. It needs to be acknowledged however that they are a part of a much larger estate of public forests that have different emphasis and as such state forests complement other forest tenures that have a more conservation-based emphasis.

Nonetheless, substantial areas of State forests, about half the estate, are already set aside in reserves that contribute to the Comprehensive Adequate and Representative (CAR) Reserve system established more than 20 years ago. The CAR Reserve as defined by the Montreal process aimed to have in reservation defined forest ecosystems and having met those targets, why now are we considering additional reserves? As described above, sustainable forestry is not incompatible with providing clean drinking water catchments, flora and fauna habitat, recreation opportunities and cultural connection with country.

As Koalas are currently very topical and seemingly the basis for the proposed new National Park, it would seem prudent to ensure that any proposed changes will achieve the stated objective.

However, there is in fact no evidence that additional areas set aside will have any impact whatsoever on protecting Koalas. What the scientific evidence does show is that Koalas occur in equal proportion on State Forest and in National Park. Changing the relative proportion toward more National Park will not improve outcomes for Koalas. What it will do is have serious consequences for our sustainable timber industries and put people out of work.

Active forestry management can provide unique opportunities to develop recreation opportunities that are not available on other tenures. And, through close engagement with Aboriginal communities, there is no reason sustainable forestry cannot provide opportunities for greater economic development for Aboriginal people.

The impact of timber production on the regional communities should not be forgotten. In many regional towns, timber production has had long history of providing employment opportunities. Linked to the industry are the range of attendant services from mechanical and fabrication to accounting and landscape businesses. Regional towns like Baradine and in the Riverina, where sustainable forest industries have been significantly reduced have not a boom in eco-tourism to offset the employment lost through closure of timber industries. These industries provide stable and long-term employment opportunities directly and indirectly through supporting services. Other regional towns like Bulahdelah, Wauchope, Walcha, Grafton and Coffs Harbour all have

links to the timber industry to varying degrees and will be also impacted any expansion of the National Park estate.

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

Utilising native forests for timber is an obvious benefit as trees absorb carbon and are renewable. Reducing the supply of timber will have direct consequences due to substitution of timber for more carbon intensive products like composite plastics, concrete and steel. Additionally, and there is already evidence of this following the Victorian decision to end native forest harvesting, transport costs and carbon emissions will increase due to the need to ship timber from other states or countries to meet timber shortages. Reducing the production of native timbers will therefore increase carbon emissions – this again seems an illogical approach given the Governments position on reducing emission to net zero.

Forest management in the future will need to be more proactive if the impacts of climate change and severe wildfires are to be mitigated. Following 2019/20 we have experienced wetter than normal conditions, however this will change, and we will again face serious fire threats in the coming years. Broadscale hazard reduction burning that is coordinated across tenures is a way to reduce the impacts of wildfires which are massive emitters of CO₂. There is potential to reduce these impacts through better coordinated and funded hazard reduction. This needs to be coupled with appropriate regulation that recognises the benefit of hazard reduction burning and does not create unnecessary impediments. The Australian forest ecosystems have evolved through regular fire and are adapted to it & the communities now considered high conservation value have evolved through regular fire in the landscape and they need not be excluded from hazard reduction burning in many cases. A more practical approach to facilitate this more prescribed burning would be beneficial to the future health of our forests and forest communities and would help reduce the safety risks to people living near forests.

Another consequence of a reduction in the timber industry on fire management, is a commensurate reduction in skilled machinery operators. Wildfire suppression in remote forested country requires specialised machinery and the skills to operate them. Reducing this capacity will have an impact on the availability of these resources which, when we again see severe fire weather conditions, will impact the ability of these fires to be controlled.