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

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Environment Minister Penny Sharpe stated on the 17th of July 2024 '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). A major driver in the critical state of our biodiversity loss is the increasing clearing of native vegetation and the poor health of our river systems (NSW State of the Environment, NSW EPA, 2022).

The Government's stated ambition of 'Nature Positive' cannot be achieved if habitat destruction and fragmentation via Native Forest Logging continues. These are issues that cannot wait to be resolved in some future timeframe whilst biodiversity declines and native species continue to slide at a rapidly increasing rate into extinction. As strongly recommended in the Henry Review (Independent Review of the Biodiversity Act, August 2023) there is a need for both immediacy and primacy if biodiversity loss and the extinction crisis is to be averted.

At last count there are 1,918 Australian species now listed as threatened or endangered status, 269 in NSW, with even more expected in the next 10 years, with habitat destruction and fragmentation the recognised primary driver, particularly in NSW and Queensland (State of the Environment, DCCEEW, 2022). The loss of old hollow bearing trees, and trees in the process of developing hollows over time, is a significant factor as over 174 species are dependent on hollows, some requiring multiple hollows (e.g. squirrel gliders and brush-tailed phascogales). Even if a limited number of hollow bearing trees are preserved, logging still drastically reduces the availability of older trees to grow and develop hollows-which takes several decades and longer. Native Forest Logging is dependent on clearing native vegetation, typically at an industrial level, often now in areas of high conservation value for threatened species. As such it is adding to localised extinctions and fuelling the overall extinction crisis in which Australia is now a world leader. Three readily available examples are Kiewit State Forest, Bulga State Forest & Styx State Forest, all habitats for koala, greater glider, yellow bellied glider, squirrel glider, brush-tailed phascogale glossy black cockatoos, grey-headed flying foxes and more.

Native animals and birds are territorial, and many have relatively short life spans and breeding potential. Destruction of habitat, even if it not resulting in immediate fatalities, causes displacements that lead to severe stress, territorial conflict, disruption of breeding capability, malnutrition and increased risks of predation, motor vehicle strikes or other harm from human contact. Many native animals are also highly stressed by the near presence of loud mechanical clearing and human activity with stress a known contributor to disease vulnerability such as chlamydia in koalas.

Native forest logging impacts on the health of streams and rivers for aquatic species by increasing erosion, sedimentation and storm damage vulnerability in riparian zones. This in turn impacts on other vulnerable and threatened species such as platypus and manning river turtle.

As a wildlife rescue and rehabilitation charity that operates over an area that includes a number of remnant high conservation value state forests targeted for logging, we cannot emphasize enough

the devastating and long-term impact of native forest destruction on wildlife populations. The current rate of loss and escalating extinction of native species is not sustainable.

Native Forest Logging is unsustainable because the complexity of the biodiversity of a multi-flora and fauna environment is still not fully understood. A 2004 report stated that 16,532 plants and 3,817 animal species had been identified as forest-dependent with more expected to be identified due to limited comprehensive research and reporting at that time (Dept of Agriculture, Fisheries & Forestry, Australian Government 2004). Native forest logging, 'thinning' or 'gardening' degrades the as yet fully understood biodiversity, replacing it with a simpler flora scape that is more vulnerable to feral weed and pest invasion, disease, and bushfire (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).

Native Forest Logging is not sustainable because it requires major taxpayer subsidies to operate. Frontier Economics (30 May 2023) state 'Forestry Corporation of NSW's (FCNSW's) native forest logging business appears to offer poor financial returns to NSW taxpayers, with some parts of the hardwood business unlikely to be covering costs. The Independent Pricing and Regulatory Tribunal of NSW (IPART) has also reported on the loss-making activities of FCNSW's hardwood division. There is also clear evidence that that value of the native forest would be higher as a standing resource.'

The Nature Conservation Council estimated that NSW Forestry Corporation has received \$246.9 million worth of grants since the 2019/20 financial year, with the hardwood native forest division receiving additional Federal Government grants \$9,787,851. in 2020-21 for bushfire recovery and State Government grants of \$10 million in 2022 for flood relief.

According to the Sydney Morning Herald, (March 15, 2022) 'The state-owned Forestry Corporation suffered a \$20 million loss last year, with NSW taxpayers forced to pay \$441 per hectare to log critical native forests. The net cost of destroying more than 13,500 hectares of red gum, ironbark and cypress trees, largely for woodchip exports and firewood, was \$6 million, while one-off recovery costs following the Black Summer bushfires soared to \$14 million.'

This for an industry that Frontier Economics states employ some 1,070 across the State , including those employed by FCNSW, harvest/haulage contractors and mills.

Native Forest Logging is not sustainable because it does not provide value for money in end products with less than 10% of sawn timbers coming from native forests (Department of Agriculture, Fisheries & Forest, 2023, Australia's State of the Forest Report, Canberra, Australia). Instead, Native Forest Logging primarily goes into low value, high volume products such as woodchips and paper pulp (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).

Native Forest Logging is not sustainable because Forestry Corporation continues to flout lawful practices, including logging hollow bearing habitat trees and within identified exclusion zones. More than 1.1 million dollars in penalties for over a dozen incidences including 7 criminal convictions has been racked up and presumably paid for by taxpayers, one way or another, in less than 5 years. An additional 18 possibly illegal actions are currently under investigation and could potentially result in a further 12 million dollars of penalties (ABC 24/7/24). Justice Rachel Pepper, from the Land and Environment Court, has found that Forestry Corporation has 'a pattern' of illegally damaging the environment and had refused to accept the 'true extent of the harm that it has caused' (Lisa Cox, The Guardian,31 July 2024).

Native Forestry Logging is not sustainable not only because of repeated illegal breaches but also because the environmental watchdog, the Environmental Protection Agency, does not have the resources to fully police Forestry Corporation to ensure that repeat offending does not occur.

Instead, the burden falls upon community, individuals and activist groups, who are vulnerable to arrest for trespass and criminal charges themselves, to bring attention to illegal practices.

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

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Australia's rich biodiversity is of heritage value for all Australians.

The defacing or destruction of a heritage building would be considered acts of criminal vandalism. However destroying native forests, despite weak and blatantly unachievable promises of effective regeneration, is a state and taxpayer supported industry with those who attempt to protest criminalised.

Given that nature-based tourism currently generates 20 billion dollars a year in income and reportedly is the primary reason people visit Australia (National Parks Association) Australia's biodiversity also holds heritage value to the wider global population. The millions of dollars of donations that poured into the country following and during the devastation of the 2019-2020 Black Spring and Summer fires as the world reacted in horror and grief to the images of burnt koalas and other wildlife is further evidence that the world cares and values Australia's biodiversity which is dependant on intact and healthy Native Forests.

The koala is perhaps the most iconic of Australian animals and reportedly 'earns' 3.2 billion of tourist dollars for Australia per annum and 30.000 jobs (Australia Koala Foundation). Yet, through native forest logging and habitat destruction and fragmentation, it is listed as likely to be extinct in the wild in NSW by 2050 (NSW Department of Environment & Heritage).

The promised Great Koala National Park was a major electoral commitment from the Minns government to proactively reverse this extinction cascade, and no doubt was instrumental in their success in gaining office. This too provides evidence of the cultural value voters in NSW place on biodiversity and native forests. The current and proposed logging of this park, with more than half of 20 logging operations within the promised park despite it composing of just one fifth of the state forests in the region (Nature Conservation Council June 28, 2024 Press Release), is a travesty of those promises. This betrayal of trust of those who believed this government was committed to reversing the extinction slide is made even more bitter because it is a state-owned logging organisation consistently requiring millions of taxpayer dollars to support the destruction.

The industrial scale logging of Native Forests not only further exacerbates the extinction crisis of species such as koala, greater glider, yellow-bellied glider, squirrel glider, powerful owls, quolls, grey-headed flying foxes and brush-tailed phascogales, all listed as threatened and endangered species, it also causes widespread grief and despair for the communities who are forced to witness it.

The rising community outrage and protests of otherwise law-abiding people who risk criminal convictions and personal harm to block native forest logging is again evidence of the enormous cultural significance and the environmental value that is attached to our native forests.

The Minns government states in its Plan for Nature (NSW Media Release 17 July 2024) that it 'acknowledges the intrinsic relationship between biodiversity and Aboriginal culture'. This raises the question as to what the Minns Government's message truly is to Indigenous peoples when it champions the destruction of Native Forests through industrial level logging, by a state-owned agency with multiple convictions for breaching lawful restrictions.

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

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Native forest logging is not the primary source of quality timber products with 90% of sawn timbers sourced from plantations. Native Forest Logging principally results in low value, high volume products such 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.

Both New Zealand and South Australia have successfully transitioned away from logging native forests decades ago and instead focussed on plantations timber harvesting. An important caveat, however, is that native forests should not be destroyed in order to develop plantations.

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

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

Native forests have critical value for species that are of threatened status and those species soon to be of threatened status. As stated earlier, habitat destruction and fragmentation are a major driver of local extinctions, which have a cumulative impact upon the extinction crisis generally. The scientific evidence demonstrates that logging or 'thinning' or 'forest gardening' all degrade flora and fauna richness, and while perhaps favouring some species, seriously disadvantages others that require multi-storey diverse vegetation to survive (G.J. Murray C. Everett, & D.B Lindenmeyer 6 Sept 2024, 'Logging by another name -forest gardening, perils and irritations). Such degradation also opens forests to invasive weed infestations (for example: lantana, bridal creeper & invasive grass weeds) that further increases fire risk and biodiversity degradation. Plantation Forests are already the primary source of usable timber (as opposed to woodchips and pulp) and offer more employment opportunities for management of weed and feral species, fire-risk, recreational and tourist values and carbon credits. Increasing the production of plantation forests on already cleared or degraded lands will help meet timber supply needs.

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

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To quote the Henry Review 'The Review Panel considers that nature positive is not only an environmental necessity, but crucial for underpinning future economic growth and wellbeing' (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').

Should biodiverse rich Native Forests, including the promised Great National Koala Park be protected in a viable, immediate and meaningful way, that is not substantially logged and degraded, they will boost nature tourism. In the case of the Great National Koala Park this economic boost would occur across five local government areas. Forestry Corporation workers could be retrained to be care-takers, rangers, regeneration workers and tourist guides. Local businesses catering to tourists and visitors, including accommodation, food services and nature-

based businesses should all benefit and be able to employ more staff with more income injected into local economies. Aboriginal sustainable practices and cultural events, bush medicines and foods, cultural education and entertainments, and care of country including cool burn mosaic hazard reductions, could generate positive social and financial benefits across Indigenous and the broader community.

Plantation timbers will also need to be managed, including fire and invasive species management, and general maintenance and could also be incorporated into the tourist industry, particularly catering for increasing number of camping and caravanning tourism (National Park Camping Grounds are often overbooked during school holidays and don't allow pets).

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

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The major challenge of our time is accelerating climate change. Healthy diverse and complex native forests that include old growth trees with hollows are carbon sinks and provide multiple biodiversity benefits. Conversely, logging of Native Forests generates large amounts of carbon release and emissions for the end products of wood chips and pulp. When native forest logging decreased in Tasmania, major carbon credits were achieved. By contrast, the planting and harvesting of fast-growing plantation trees on already cleared or degraded land is a carbon positive process and presumably could be included in carbon markets.

Healthy diverse forests are more resilient to bushfire, capture and release moisture, provide more protection for waterways. Dense complex canopies are less vulnerable to weed infestations and offer the best sanctuaries for wildlife as proven in the Black Summer fires.