

Public submission

NAME REDACTED

Submission ID: 204577

Organisation: *N/A*

Location: *New South Wales*

Supporting materials uploaded: *Attached overleaf*

Submission date: 10/12/2024 7:59:32 PM

Your submission

1. Sustainability of current and future forestry operations in NSW

Native forest in Australia consists of 131 million hectare, of which NSW consist of just 15% at just under 20 million hectares in NSW. Commercial plantations in NSW consist of approx. 400,000ha, which is 20% of the National commercial plantation estate.

NSW has always played a lead role with forestry in Australia, and should continue with certainty to provide forest values for various outcomes. To simply shut down or reduce the capacity of all forms of forestry would be short sighted with global and local demands for timber and also all other opportunities that exist with the land tenure of "State forest".

Public managed forests in NSW:

- 9 million hectares in NSW National Parks and Wildlife estate managed for conservation.
- 2 million hectares of Native forests within NSW State Forests managed for multiply purposes including wood products, gravel/quarries, water catchment health, tourism and recreation, non-wood products like honey, Aboriginal cultural heritage and non-indigenous cultural heritage, forest health and fire management.

Less than 1% of the estate is harvested annually, with much of this 2 million ha area either formally or informally protected under current policy and practices:

- Nationally agreed Comprehensive, Adequate and Representative (CAR) Reserve System special prescription/protections of formal and informal exclusion zones including old growth, rainforest, water conservation and biodiversity.
- Coastal Integrated Forestry Operations Approvals including threatened species, fisheries and environmental protections.
- Certification to PEFC /Australian Forestry Standard and Forest Management Systems processes.
- gazetted Aboriginal Places and cultural sites.

How can current practice improve?

- Look at the science and practices rather than the emotional political view points
- Review of the National Forestry Policy Statement 1992 to better reflect the changing roles of ecological sustainable forest management going forward and issues such as climate change and global and national wood demand. States and Territories can then review their own policies and practices to follow the National consensus rather than "go it alone" like other State, which have not considered the National position and interest.
- Reposition "forestry" as a renewable natural resource essential for future needs whilst being a part of the climate change solution and carbon management.
- Native forestry is already incredibly regulated under the CIFOA NSW and regarded as the most regulated native forest practices in the world. More certainty is required into the future to secure futures resources and also investment confidence.
- Modify the regulatory enforcement "stick" approach of compliance to a continuous improvement adaptive co-regulation approach. It is essential forest management is regulated by those most educated in the practices, rather than generalist environmental approach that is reactive and short sighted.

Submission template

- Public/community education on the importance of forestry science and “all” forest values, especially the acknowledging the known respected science around threatened species and adaptive management.
- Politician education on the importance of forestry science and “all” forest values, especially the acknowledging the known respected science around threatened species and adaptive management within current forest management systems.
- Consistency across Forest Practices - efficiencies could be gained by recognising the importance of native forests for various values and streamlining forestry “best” practices to cover native, plantation and private operations across all tenures, similar to Tasmania’s framework.
- Leadership - Be responsible in managing the forest resources to best practice, and do not outsource the conservation issues to developing countries who cannot manage their own biodiversity and climate change challenges. NSW must own its resource needs.
- Secure permanent forestry zones – the continually reduction of the area available to timber harvesting by short term political decisions, the wood supply/inventory is continually impacted for future generations. This footprint needs to be recognised and secured for future resource management.
- Recognise that Forest Management doesn’t just include timber harvesting – most Forest Managers recognise Forestry operations to include fire management including hazard reduction burning, silviculture, road management, catchment health, recreation and tourism, Aboriginal cultural heritage and forest health. Active forest management is required to keep the forests health and sustainable.

Yes, current practice can improve however the industry needs to stop being attacked for operating in an authorised and legitimate way. The above points should all be considered now as part of this review process, which will benefit both environment and industry into the future.

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

Refer to Point 1 on sustainability as Forest Management principles are based off ecological sustainable forest management which value, recognise and consider environmental and cultural values as important assets of the forest. Forest Practices in the protection of environmental and cultural heritage are very strong and on par with other land managers under the same legislation we all follow. To isolate forestry as an appendage is not necessary with current best practices.

The biggest threat to environmental and cultural values is land clearing and development. Whilst these practices need to occur to some extent with strict prescriptions, the native forestry industry has somehow been the recipient of incorrect claims from activist groups that harvesting a forest is land clearing. The use of the words “deforestation” and “destroyed” and emotional campaigns that seem to capture both people and politicians. Forestry is a known science, and correctly done manages all forest values in unison.

The proposal of a Great Koala National Park is very emotive, and baseless from the known scientific data of koalas. It is a good example of lack of leadership and minority groups providing misinformation. Koala do thrive in native forests that have been harvested, as the structural regeneration succession of the regrowth provides sort after fresh new leaves. Forestry operations are not listed as “key threatening process” for Koalas, yet the Great Koala National Park sounds like a great legacy proposal by a small fraction of the community who use incorrect terminology like “deforestation”. Land clearing and roads kill koalas. Native forestry operations has co-existed with koalas for a long time.

Whilst there are strict prescriptions in Native forest operations, there are less strict requirements for private native operations and plantations. Consistent Forest Practices across all operations - efficiencies could be

Submission template

gained by recognising the importance of native forests for various values and streamlining forestry “best” practices to cover native, plantation and private operations across all tenures, similar to Tasmania’s framework.

There are no needs to further increase the regulatory rulesets of the CIFOA, as they are currently overcomplicated and difficult to interpret. The CIFOA needs simplification and be applied across all tenures including private native harvesting. Any fire management prescriptions need to be reviewed to be more encouraging to burn our forest estate for forest health, fuel management and cultural practices. Making it more difficult just prohibits burning.

Aboriginal cultural heritage management needs to continue and be enhanced in a practical way. It needs to be acknowledged that there has been local traditional knowledge lost and we are at the rebuilding stage. It is important to also acknowledge that Aboriginal cultural practices in northern Australia are not the same as in southern areas. One model doesn’t fit all.

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

United Nations Forest and Agriculture Organisation’s Dr Lyndall Bull reports huge global demand for timber/wood fibre products, with the current global addition to non-renewable materials being 85%, leaving huge opportunity for the bio-economy of renewable timber/wood fibre products to better compete in this non-renewable space. Current innovate and technology is now allowing timber/wood fibres to be used in now incredible diverse applications across various industries, replacing the non-renewable materials markets.

Global, National, State/Territories are all experiencing housing shortages and cost of living challenges. Current wood supply needs to be expanded to meet population growth. Any and all existing forestry estate should be secured and maintained as an immediate, with future forests being planned and expanded. Acknowledgement that regrowth forests need to be managed into the future and not simply locked up. These regrowth forests are going to be a problem in future years for wild fire management and biodiversity.

Competition for land with establishment of new forests is highly competitive with agriculture, solar and wind projects.

Long term financial and product returns and ongoing active risk management of new and establishing forests is a budget sheet challenge. With huge upfront establishment costs, ongoing forest health and fire management mitigation measures until the harvest rotation, means spreadsheets and annual returns don’t look attractive. All of forest management needs to be considered on spreadsheets and not just timber value. Nature Based Solutions including Natural Capital Accounting, bio-economy and various biodiversity offsets and carbon schemes need to bolster the spreadsheets for an “all of management” approach across all tenures.

Submission template

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

Plantations play a hugely important role of timber supply however alone they are a risk going forward with climate change challenges. Eucalyptus species are vulnerable to temperature increase of 1-2 degrees Celsius, and with long plantation rotation times, there is uncertainty of the product into the future due to the impacts during the rotation period. Pinus radiata is also vulnerable to tree mortality and forest health impacts with increased atmospheric temperatures.

Risk Management 101 – diversify your assets to mitigate your risks. Having all eggs in one basket moving into rising temperatures, diversifying your timbered estate across the geographic landscape and mixing between native and plantation species will best mitigate potential tree mortality from climate change impacts.

Young growing forests, especially Eucalyptus sp., are the most efficient plants on earth at sucking up carbon dioxide from the atmosphere. Adapting plantation rotations to best accommodate and maximise carbon intake is an essential management requirement going forward. Incentivising carbon credit schemes to turbo charge young forests is something the industry needs to engage more with now.

New forest and their renewal is part of the solution of climate change and future timber supply. Maturing and older forests are far less effective of sequestering carbon from the atmosphere, however play an important role across the landscapes biodiversity.

Private native forests need to same scrutiny of public managed forests. You cant have rules for some and rules for others. Being approved by LLS and regulated by EPA doesn't make sense, when the majority of native harvesting falls under CIFOA. There are too many forestry agencies involved across tenure and estates, including Dept of Primary Industry, Local Land Services, Forestry Corp of NSW, Environment Protection Authority etc.

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

NSW State Forests are multi-use public forest providing for a diverse range of user groups and stakeholders such as:

- Forest environment – foresters are passionate about actively managing their forests including biodiversity, water and conservation.
- Carbon sequestration – constant renewal of existing forests and the establishment of new forests provides for increased carbon dioxide uptake especially our species and geographic locations in the Southern Hemisphere.
- Public use of our forests including free recreation (camping, bushwalking, mountain biking, trail bike and 4WD, fire wood collection, events and tourism drivers)
- Apiarists/bee keepers with bee sites within our forest for honey bee products.
- Aboriginal Cultural heritage sites are identified by Aboriginal staff to protect culture and engage local Traditional Owners and Custodians for ongoing management.
- Forest education and research for students at primary, secondary and tertiary and forest research
- Forest products and materials such as gravels in Hardrock quarries and commercial palm supply
- You can do more things in a State Forest than you can do in a National Park for a greater audience of the public... for free.

Submission template

There is a huge opportunity to further engage Aboriginal forest management going forward, not just with cultural knowledge and practices however business development including tourism, timber supply, environmental management etc.

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

NSW Forestry sector must move in this space to be a National leader contributing to the solution. NSW Forest researchers have for decades learnt and researched carbon sequestration, tree improvement and carbon in soils. Why is this vast research not being used?

There are numerous opportunities for NSW Forests to activate this knowledge base and engage in Nature Based Solutions, Bio-economy markets, Australian Carbon Credit Units schemes and biodiversity offsets to mitigate greenhouse gas impacts.

Current Paris Agreement targets are thought to be unachievable as a mitigation strategy, so any new strategic change should also consider investment in adaption strategy and programs. State Forests can own this space as a leader in the carbon economy.

Move now! Turbo charge it. Engage Aboriginal stakeholders in this growth space.

Forico in Tasmania are doing plenty of work and seem to be setting the pace in Australia. NSW can learn, adjust and modify our young plantations to deliver more than just wood.

After filling in this submission template, please upload the completed submission to our online submission portal, linked [here](#). When you upload your submission successfully, you will receive a confirmation email from us. If you don't receive a confirmation email, please check your Junk Email folder. If you have further issues, please email forestryiap@ipcn.nsw.gov.au for assistance.