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

The native forest logging industry is not environmentally or economically sustainable. It is not environmentally sustainable because it occurs in areas that are important to the conservation of many threatened species. Old forest trees provide hollows that take hundreds of years to develop to the point where they are suitable for some hollow-dependent species. Old growth forest also has a structure that is more resilient to bushfire than regenerated forest, even quite old regenerated forest. Once logging has occurred, this leaves regenerating forest much more vulnerable to fire (see Lindenmayer D B, & Zylstra P 2024, Identifying and managing disturbance-stimulated flammability in woody ecosystems. *Biological Reviews* 99:699,714.). Unfortunately, logging continues to impact on many species that have already been affected by historic logging, as documented in many places such as Ashman M K, Lindenmayer D B, Legge S, Kindler G, Cadman T, Fletcher R, Whiterod N, Lintermans M, Zylstra P, Stewart R, Thomas H, Blanch S, & Watson J E 2024, Shifting baselines clarify the impacts of contemporary logging on forest-dependent threatened species. *Conservation Science & Practice* 6:e13185.

Forestry operations in NSW as elsewhere in Australia are not economically sustainable, and continue only because they are substantially subsidised by governments aka we the taxpayer. For example, Frontier Economics estimated in 2023 that the NSW Forestry Corp received a total government subsidy of \$249m in 2019-20 but still produced a multi-million dollar loss in that financial year. This is a shocking waste of taxpayer funds, going towards an environmentally destructive activity that largely produces low-grade products such as wood chips and paper pulp from magnificent trees with huge cultural and environmental value. Plantation timber grown in areas that have not recently been native forest is a much better way to go.

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

Forests in Australia have immense environmental and cultural value. They are home to increasing numbers of threatened species, as logging and clearing on private and public land reduces the total amount of habitat available. These species include multiple mammals, such as Koala, quoll species, Greater Glider, Yellow-bellied Glider, Eastern Pygmy Possum and many others. Beyond that many threatened species of plant, invertebrate, reptiles and amphibians fundamentally depend on forests for their existence and survival. Many species are yet to be formally described by science, and often once they are described immediately end up on the threatened list. The best way to protect these environmental and cultural values is to stop logging in native forests.

For First Nations Peoples, forests have significant cultural heritage value, including at the landscape level. First Nations People's cultural heritage receives inadequate legal protection at both federal (as documented in the 2021 federal State of the Environment report, <https://soe.dcceew.gov.au/indigenous/management/national-and-international-frameworks-support-caring-country>). At the state level, Aboriginal Cultural Heritage is still managed under the National Parks and Wildlife Act of 1974, a situation that has been recognised as inadequate by many stakeholders for many years.

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

I have no particular views on this topic, except to say that native forests are overwhelmingly used for low-value products such as wood chips and paper pulp, for which there are many less damaging sources, and also many (largely untried) strategies for reducing demand.

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

I have no particular views on this topic, except to say that native forests absolutely must in no circumstances be converted to plantations. Use land that has no native forest present on it. Ideally, design plantations to maximise biodiversity value.

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 should be managed for environmental and cultural values first and foremost, given their great significance for both these values. They should be converted to be part of the national parks estate, such as the proposed Great Koala National Park. National parks estate can have significant social and even economic outcomes through passive recreational activities, and the economic benefits of ecosystem services such as carbon sequestration, maintenance of biodiversity for human benefit (e.g. pollination services, air cleaning services, maintaining water quality in waterways and reservoirs, encouraging inland precipitation etc). These may not be 'dollars in the pocket' type economic values, but they are nonetheless very significant and often uncounted benefits of native forests across NSW and Australia. For more on the concept of ecosystem services and accounting for these, see Robert Costanza's 'Misconceptions about the valuation of ecosystem services', *Ecosystem Services* 70 (December 2024)
<https://doi.org/10.1016/j.ecoser.2024.101667>

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

The best way to achieve carbon sequestration and biodiversity benefits is simply to stop logging native forests. Logging is carbon-intensive and reduces the carbon-sequestration potential of the logged area for decades, at a time when climate change mitigation is one of the most urgent tasks facing humankind. Unlogged forests are better at carbon sequestration, as documented in the Australian context by David Keith and colleagues (Keith H, Lindenmayer, D B, Mackey B G, Blair D, Carter L, McBurney L, Okada S, & Konishi-Nagano T 2014, *Managing temperate forests for carbon storage: impacts of logging versus forest protection on carbon stocks*. *Ecosphere* 5(6), [http://dx.doi.org/10.1890/ES1814-00051.00051.](http://dx.doi.org/10.1890/ES1814-00051.00051)), and internationally by Mark G. Anderson (<https://ijw.org/wild-carbon-storage-in-old-forests/>). I do not support carbon or biodiversity markets, and note that the recent review of the NSW Biodiversity Conservation Act recommended fundamental reform to the biodiversity offsets scheme in this state, and that there has been a regular drumbeat of reports demonstrating that carbon offset schemes are failing to deliver results (see for example from this month, <https://www.unsw.edu.au/newsroom/news/2024/10/failures-beyond-belief--carbon-offset-projects-failing-to-delive>, or from earlier in 2024, Macintosh, A, Butler D, Larraondo P, Evans M C, Ansell D, Waschka M, Fensham R, Eldridge E, Lindenmayer D B, Gibbons P, & Summerfield P 2024,

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Australian human-induced native forest regeneration carbon offset projects have limited impact on changes in woody vegetation cover and carbon removals. Communications, Earth & Environment 5:149.).