Independent Forestry Panel

Public submission

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To: Independent Forestry Panel

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SUBMISSION ON SUSTAINABILITY OF NSW FORESTRY

I understand that the Independent Forestry Panel is leading the enquiry into the sustainability of NSW's forestry set up to inform the Government's 30-year Forestry Action Plan. I thank the Panel for accepting my comments.

My main concern is the adverse impacts past and current forestry practices have had and are having on our native forests. The loss and damage done and being done to NSW native forests far outweigh any benefit the Corporation brings.

Introductory points

-- "On January 1 this year, both Victoria and Western Australia ended native forest logging in state forests. This is a good start. But the rest of Australia is still logging native forests. Extensive land clearing continues for agriculture and urban development, as well as native forest harvesting on private land." Ending native forest logging would help Australia's climate goals much more than planting trees (theconversation.com) Kate Dooley, Research Fellow, School of Geography, Earth and Atmospheric Sciences, The University of Melbourne

--"In **Eastern Australia**, nearly half of the original forested area has been lost. The once vast brigalow and grassy box forests of inland eastern Australia are now endangered or critically endangered. Over 700 native plant and animal species are threatened by forest habitat destruction, including the iconic koala. Clearing for pasture for livestock is a major driver of deforestation, while recent unprecedented fires are also having an impact, particularly of the unique Gondwanan relict rainforests." Deforestation Fronts - Factsheets | WWF (panda.org)

1. Sustainability of current and future forestry operations in NSW

Most of the State Forests that the Forestry Corporation manages are native forest—of the 2 million state forests it manages, 1.8 million hectares are native forests (Forestry Corporation - Hardwood timber plantations). The face the Corporation portrays to the public is of an organisation that cares for and sustains the forests it exploits. However, its commitment to extensive industrial logging has no basis in current environmental science and the Corporation's impact on the forests it manages reflects this: it is managing our native forests to death! From both economic and environmental standpoints, the operations in native forests of the NSW Forestry Corporation are unsustainable.

From a purely economic viewpoint, it is clear that the logging of native forests is a burden to the public purse. According to Frontier Economics (2023), the Forestry Corporation made a loss of $28 million in FY 2029-2020 despite subsidies and grants of $249 million Public native forest logging: a large and growing taxpayer burden - Frontier Economics (frontier-economics.com.au). Some of this subsidy is internal, coming from

the Corporation's own plantation products—the Corporation is producing/ignoring its own hard evidence that native forest logging is a drain on its budget and thus financially insupportable.

Lack of financial justification for natural forest logging is damning. More damning still is the environmental impact. Keeping in mind that the socio-economic wellbeing of the state is dependent on the health of water, air, soil and climate, environmental losses resulting from native forest logging are doubly damning.

All native forests, including those under the Forestry Corporation's management, have biodiversity value and environmental services essential for the prosperity of the state, indeed the country. Some of the ways in which native forest logging causes environmental decline include:

Reduction in carbon storage, above- and below-ground

After oceans, forests are the world's largest storehouses of carbon Deforestation Fronts | WWF (panda.org).

As carbon storehouses, Australia's east coast forests are impressive. In 2008, using SE Australian forests as standard, scientists estimated total above- and below-ground carbon in forests to be " ecotone (697 Mg ha^{-1}, 95% confidence interval 575–819 Mg ha^{-1}) and eucalypt forests (689 Mg ha^{-1}, 605–773 Mg ha^{-1}) than rainforest (550 Mg ha^{-1}, 453–647 Mg ha^{-1}). Carbon stocks in temperate forests of south-eastern Australia reflect large tree distribution and edaphic conditions - ScienceDirect

Loss of critical habitat

In recent research it is estimated that Australia-wide 244 forest dependent species are being adversely impacted by logging. Given that more than half of the continent's original forest has been lost since European colonisation, we can't afford further biodiversity degradation. Researchers make this clear:

"We show that more than half (29 million ha) of pre-1750 (pre European colonization of Australia) native forest and woodland vegetation in NSW has been lost. Of the remaining 25 million ha, 9 million ha is degraded. We found contemporary degradation from logging affected 244 forest-dependent now threatened species that had already been affected by this historical deforestation and degradation, but the impacts varied across species and vegetation types. We found that 70 now-threatened species that were impacted by historical deforestation and degradation and continue to be impacted by logging, now have ≤50% of their pre-1750 extent remaining that is intact, with these species now having need to consider not only the extent of remaining habitat based on pre-1750 extents, but also its condition." Michelle Ward, Kita Ashman, David Lindenmayer, et al., 'The impacts of contemporary logging after 250 years of deforestation and degradation on forest-dependent threatened species' [open file, www.researchgate.net] Feb 2023 DOI:10.1101/2023.02.22.529603

It is not only irksome but heartbreaking to know that most of the Corporation's native forest product is used for low value products, such as woodchips, paper pulp and packaging material (federal Dept. of Agriculture, fisheries and Forestry 2024 data) https://www.agriculture.gov.au/agriculture-land/forestry)

Destruction of hollows

Corporation logging involves the removal mature trees, that is, trees with hollows or with the potential to form hollows. This is deforestation at its worst. Panelists would be aware that the Loss of Hollow-bearing Trees is a Key Threatening Process under the Threatened Species Conservation Act 1995 (now replaced with the Biodiversity Conservation Act 2016). The NSW Government, under the older Act, tables 174 native species as hollow-dependent: "In NSW, terrestrial vertebrate species that are reliant on tree hollows for shelter and nests include at least 46 mammals, 81 birds, 31 reptiles and 16 frogs (Gibbons and Lindenmayer 1997, Gibbons and Lindenmayer 2002). Of these, 40 species are listed as threatened on Schedule 1 and Schedule 2 of the Threatened Species Conservation Act". In being allowed to log mature trees, the Corporation has been made exempt, arguably, from state environmental law.

The Koala is of course among the most iconic of NSW endangered species. The 2020 Legislative Council inquiry into NSW's Koala population and habitat concluded that without action the Koala will be extinct by 2050. It is indicative of the Forestry Corporation's unfathomable irresponsibility that it has adopted a logging plan targeting 30,397 ha (14%) of native forest of the proposed Great Koala National Park. Approximately 518 records of koala exist for this area.

Increase in forest flammability

Current research indicating that logged forest is more vulnerable to fire is of foremost relevance, particularly in view of the deadly and increasing wildfire risks brought to NSW by climate change. Exemplary of this research is the work of Professor David Lindenmayer and colleagues (e.g. David Lindenmayer, Philip Zylstra, Marta Yebra, Adaptive Wildlife mitigation approaches; *Science* 8 Sep 2022, Vol 377, Issue 6611,pp. 1163-1164, DOI: 10.1126/science.ade4721)

In both moderate and extreme fire conditions, the burn severity of logged forests undergoing regeneration is significantly higher than that of intact forests—this must be considered. The fact that it can take 40-70 years for a degraded area to meet intact status is also, literally, a burning issue. Given global warming predictions for NSW of more severe storm, flood, drought and fire, what chances has NSW of seeing a regenerating forest achieve this age?

In Australian native forests, " stands of trees of intermediate age (10–40 years old) are at greater risk of high severity (crown burning fire) than those that are either very young or very old" (Lindenmayer et al., Perspectives: Better managing fire in flammable tree plantations https://doi.org/10.1016/j.foreco.2022.120641). Plantations too are vulnerable to wildfire. However, if planned and located appropriately and managed well,

their risk can be significantly reduced. In the above-mentioned study, researchers "... argue that a multi-pronged and multi-scaled approach is needed that encompasses aspects of well considered plantation location, landscape design, reducing the risk of point source ignitions, and the application of new technologies to detect fires quickly after ignition and then rapidly suppress them" .

Above researchers usefully define plantations as "*Stands of trees of native or exotic species that are specifically created by the regular placement of cuttings, seedlings, or seeds through human management*. ... typically comprised of one or a few fast-growing exotic tree species in even-aged and evenly spaced stands ... although native trees are used in many locations ...".

It is worth noting that the practice of 'thinning' is not only destructive of forest environmental values but does not reduce fire risk: "... empirical evidence shows it [thinning] either has no effect on the severity of wildfires or worsens them in some cases. One study found that thinning operations significantly increased the fuel hazard by adding 24 tonnes per hectare of fuel to the forest floor. This can increase the severity of wildfires, not only endangering the integrity of the forest itself but also putting nearby communities at increased fire risk. (David Lindenmayer & Chris Taylor "No, thinning forests isn't the answer – it worsens our wildfires", in Crikey 5 Apr. 2024 https://www.crikey.com.au/2024/04/05/forest-thinning-bushfires/)

Increased vulnerability to invasive species, pests and diseases

Degraded forests are less resilient to disease than intact forest. They are at increased risks of pests and diseases such as exotic diseases such as phytophthora dieback and myrtle rust. Both these poorly controlled diseases are a death sentence for trees aking the Corporation destructive practices particularly unacceptable.

Regulatory non-compliance and ineffective EPA regulation

The Forestry Corporation is regulated by sets of rules called Integrated Forestry Operations Approvals and its regulator is the NSW EPA. The Corporation portrays itself as maintaining impeccable standards of environmental protection. However, it is often exposed for regulatory non-compliance. The Audit Office of NSW, in its 22 June 2023 audit of the Corporation's public native forestry and the EPA's effectiveness in regulating the Corporation, found significant shortfalls (https://www.audit.nsw.gov.au/our-work/reports/regulation-of-public-native-forestry). The Corporation's monitoring of its contractors was found to be inconsistent and its monitoring activities not risk based; mandatory training for most compliance staff was provided but not for all. Inadequate regulation by the EPA included a failure to risk-assess some harvest sites; failure to provide compliance staff with training necessary to effectively undertake forestry inspections; and failure to provide some of its offices with equipment necessary for inspections.

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

Native forests are Country for many of Australia's First Nations. Access to and the good health of forests for these First Nations are essential to the integrity of their cultural connections. Also, there can be little doubt that intact forest has high value within each and every culture that make up our multicultural nation. Loss of species is a source of grief for many, many Australians, and is particularly acute for First nations.

The cultural value of forests for Indigenous and non-indigenous Australians is poignantly demonstrated in the short film 'Roots of Resilience' released by the Australian Chief Environmental Biosecurity Officer on 21 March 2024 to mark UN International Day of Forests (Uniting to preserve Australia's natural forest heritage (nsw.gov.au)). In the film, Tilly, a young project officer, poetically encapsulates the varied meanings that native forests hold for us: "The forest is everything! It's our air, grocery store, chemist, the relationships that people, different people, have with the forest, the relationships that the animals have with the forest, all the birds, the insects, the little micro-organisms, the fungii. It's everything!" This government-produced film is an illustration of how the state's ongoing support for industrial logging of native forests belies, not only the values of many in the population, but its many of its own policies and its self-promotions.

In August 2023, Gumbaynggirr elders took legal action and brought a temporary halt to logging to protect cultural sites in the Newry State Forest in NSW's mid-north coast and part of the proposed GKNP. Their aim was to stop all logging in the Newry Forest. Logging soon resumed but continues to be hotly opposed by some Gumbayngirr people. In a recent interview, Gumbaynggirr woman, and anti-logging activist, Sandy Greenwood, explains that the forest is home to the Dungirr, the Koala, whose "is a very powerful animal, their magic is strong and their spirit respected" (https://news.mongabay.com/2023/10/what-does-land-mean-to-australias-indigenous-groups-fighting-logging/). She says Dungirr have played a vital role in Gumbaynggirr creation stories, laws, spirituality and identity. She repeats what many Indigenous people have said: "Many First Nations people in Australia feel an intimate and deeply profound and seemingly genetic connection to their ancestral land".

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

Forest scientists have estimated that "if Australia ceased all logging of native forests, the avoided emissions alone would be close to what is needed annually (15.5 Mt CO2) to achieve our national target of 43% reduction on 2005 levels of emission by 2030 … Forests that are being logged now cannot recover their existing carbon stocks until long after the 2050 goal for net zero. Their loss cannot be "offset" by planting new trees" (A good start to urgent climate change abatement: end native forest logging now - Wilderness Australia; David Lindenmayer, Brendan Mackey, Heather Keith, Stopping native forest logging is the only way to meet our net zero targets. Canberra Times October 2022).

Protecting our native forests and allowing cleared forest to regenerate is urgent if we are to meet the state's emissions reduction targets. Kate Dooley warns "Earth's ecosystems, such as forests, coastal wetlands and tundra, contain enormous amounts of carbon. But deforestation and degradation by humans is likely to send global warming past 1.5°C, even if we achieve net-zero fossil fuel emissions. Protecting native forests is a critical way to prevent emissions, which must be achieved in parallel with a rapid transition to clean energy" (https://theconversation.com/ending-native-forest-logging-would-help-australias-climate-goals-much-more-than-planting-trees-229487). She goes on to make the point that protecting existing forests will achieve more climate mitigation than planting new trees "... old-growth forests store vastly more carbon than young saplings, which will take decades or even centuries to reach the same size ... Healthy ecosystems are more stable and resilient, with a lower risk of trees dying and lower rates of carbon emissions." By no means is she suggesting we stop tree planting but her point highlights the need for stopping deforestation.

Dooley, in the above-referenced article, recommends that Australia make a change to the system of carbon accounting it uses for the National Greenhouse and Energy Report Scheme. The flow-based method currently used, she explains, only takes account of carbon sequestration not carbon storage. The carbon storage achieved through protecting native forests is thus overlooked. "A comprehensive approach to forest carbon accounting would recognise both flows of carbon (as sequestration) and carbon stocks (as storage) contribute to the benefits that native forests offer for reducing emissions." Her recommendation makes sense.