

# Public submission

NAME REDACTED

Submission ID: 205262

---

**Organisation:** *N/A*

---

**Location:** *New South Wales*

---

**Supporting materials uploaded:** *Attached overleaf*

---

Submission date: 10/13/2024 10:34:56 PM

## Your submission

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

---

Well managed native forest could be the most sustainable industry of all. There is no other product as versatile, renewable and sustainable as timber. Trees in native forests require minimal inputs – only soil, space in the landscape, sunlight, rain, and time. When native forests are actively managed for their full range of values, including timber production, it is possible to supply a steady volume of these renewable timber products *in perpetuity*. The issue is that if the NSW government wants the long-term benefits of sustainable timber production in NSW, it must support the timber industry with long-term commitments. This unfortunately has not been the story over the last 30 years.

I am sure the Panel is familiar with the history. The management of forests was revolutionised in the 1990's, beginning with the National Forest Statement of 1992, followed by the Regional Forest Agreements, the establishment of a Comprehensive, Representative and Adequate (CRA) Reserve System, and the Integrated Forest Approval System (IFOA) to regulate forest operations and protect the environment. All of this was supposed to end the 'forest wars', protect environmental values while also providing long term sustained yields of timber to industry. Long-term (20+ year) Wood Supply Agreements were signed, aiming to provide secure volumes of timber products. All of these instruments were intended to provide a stable platform for the long term. But, since the 90's, there has been political announcement after announcement to transfer large swathes of State Forest to National Parks. Wood supply targets have been renegotiated lower and yet they are still beyond the ability of Forestry Corporation of NSW to consistently deliver from State forests.

The forestry industry could be the most sustainable of *all* industries in NSW. But sadly, my view is that it is currently only a shadow of it's full potential. It has suffered from repeated decisions based on flawed ideology that have eroded the available forest estate, undermined best practice, short circuited established review processes<sup>1</sup> and gone against the advice of professional peak bodies such as Forestry Australia.

Forests can be sustainably managed for environmental, social and economic values in NSW, that is certain. But this cannot be achieved without stable, long-term support from the government. I urge the Panel to create a Forest Industry Action Plan (FIAP) which addresses these issues, pushes ideologies aside, and provides the long-term support that the forestry industry in NSW needs.

---

<sup>1</sup> For example, the Brigalow Belt decision, to name one of many.

## Submission template

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

---

Forests are often very rich in environmental values and support biodiversity, including many threatened species. Forests are valuable now and into the future and must be carefully managed so that the ecosystems are maintained and supported across the landscape. I strongly believe that this requires active management<sup>2</sup> of forests. It is a misinformed fallacy to think that passive management or ‘locking it up and throwing away the key’ is the best approach for all forested areas. We have seen time and time again, in all different corners of Australia, that passive land management techniques end up contributing to intense ‘mega-fires’ which have a severely detrimental impact on biodiversity and environmental values.

Thinking more specifically about a particular species, consider the recent debate around Koalas. Koalas are listed as endangered in NSW and the compatibility of forestry operations and koala conservation is a controversial issue. Koalas need habitat that occurs in well-connected and resilient landscapes to allow koalas to move safely and for food, shelter and breeding<sup>3</sup>. Timber harvesting in forests is regularly vilified and blamed for the endangered status of this species. However, this simplistic and misinformed viewpoint disproven by research. A recent rigorous study clearly shows that *regulated timber harvesting does not reduce koala density in north-east forests of NSW*<sup>4</sup>. There was no significant effect of selective harvesting on koala density over 5-10 years. One heavily harvested area supported the second highest koala density in the study! This research concludes that “native forestry regulations provide sufficient habitat for koalas to maintain their density”. Additional koala reserves or Great Koala National Parks are unnecessary for the protection of koala populations, yet they will have a large and detrimental impact on the forest industry and the NSW community.

I must be clear, I am not at all against having permanent reserves and National Parks. These are an essential part of ensuring Ecologically Sustainable Forest Management across the state. But according to the conclusions of the cited research, a Great Koala National park will not benefit Koalas. So, the question is, what will it benefit?

I urge the panel to look beyond the ideological view that declaring more National Parks will automatically benefit environmental and cultural values. What we need is *more active management*<sup>1</sup> of forested landscape which is based on best-practice science and led by professionals who are skilled, experienced, and invested in the stewardship of forested areas for the long-term. Active management of forests for their full range of values, including the harvesting of timber, is the most efficient and effective way to promote a mosaic of different forest structures and support biodiversity and environmental values.

---

<sup>2</sup> Bennett et al. (2024), *Active management: a definition and considerations for implementation in forests of temperate Australia*. Australian Forestry

<sup>3</sup> NSW Koala Strategy, Dept Planning and Environment 2021-22.

<sup>4</sup> Law, B., Gonsalves, L., Burgar, J. et al. (2022) Regulated timber harvesting does not reduce koala density in north-east forests of New South Wales. *Sci Rep* **12**, 3968.

## Submission template

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

---

If we consider the forecast that global demand for timber and wood fibre expected to significantly increase by 2050<sup>5</sup>, alongside the recent decisions in Western Australia and Victoria to cease harvesting timber from native forests on public land, we must only expect that demand for timber products will also significantly increase in NSW. This makes it an imperative that the Panel develops a FIAP which supports a healthy and vibrant forestry industry which can better supply the current and future demand for timber products relating to local housing, mining, transport, and retail.

Timber products have many benefits over possible substitutes. Timber and wood fibre is versatile, renewable, and sequesters carbon, and can be used to make a broad array of useful and attractive products.

I cannot understand the logic of those call for the 'end of native forest logging' or want to see more of productive forest converted to permanent reserves. What do they offer as a solution to the increased demand for timber in the future? I see only two alternatives available:

- 1) Will they prefer the NSW community to simply import more timber? This would see us adding to the forest products trade deficit, missing the opportunity for local jobs and economic benefits, and throwing the important issue of sustainable forest management into other jurisdictions which may have lower forest management practices.
- 2) Or would they ignore the growing consensus across the world that timber is one of the most ecologically sustainable products that humans have to work with, and use substitute products such as steel, concrete or plastic? These substitutes bring a heavy burden on the planet. They cannot even pretend to be environmentally sustainable when compared to timber.

NSW is richly blessed with an abundance of forest resources, and demand for timber products is on the rise. So, the question is, how can the FIAP be fashioned so that it supports increasing supply of timber and wood products to meet increasing demand, so that NSW can reap the benefits?

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

---

Plantations play an important and significant role in meeting the demand for timber products in NSW. But they simply can't 'do it all'. Softwood plantations produce pine, suitable for things like house frames, particle boards and ply, and cardboard. Hardwood plantations can produce sawn timber suitable for floorboards and other feature grade building products, power poles, veneer,

---

<sup>5</sup> Global forest sector outlook 2050, (Food and Agriculture Organisation of the UN, Australian Forest, 2022)

## Submission template

decking, and other products where inherent hardness and durability is required. But the hardwood plantation estate is simply not large enough to meet the current demand for these products. It is not even close.

I encourage the Panel to look for ways to support and grow the plantation industries so that they can continue to supply the people of NSW with timber into the future. I believe this could be done by:

- Supporting industries which use low quality, pulp and residue-grade wood products from hardwood plantations. This will make it easier for plantation managers to thin their plantations on time, which leads to significantly more high-quality products at the end of the rotation. It also improves the utilisation of the stand at clearfall, which maximises the carbon benefits and improves the economics of the whole operation.
- Supporting the expansion of the plantation estates across NSW, particularly in regions with existing plantations or existing markets. This will help to improve the economies of scale for customers and plantation managers alike and will help to ensure the long-term sustainability of the industry.

Private Native Forest management also has a part to play. But it cannot meet the demands of the current industry for hardwood timber products, and it is questionable whether it could be adequately coordinated to ensure cutting does not exceed the long-term sustainable yield across all privately managed forests.

Improvements could be made to the regulation of private native forest operations which could promote better regeneration and forest health. One such improvement would be to reduce or remove the Basal Area retention limit, which is currently too high for many forest types, particularly those with moist or mesic understorey. This part of the current regulation is currently leading to many forests being high-graded and is inhibiting regeneration after harvesting.

I encourage the Panel to consider these improvements to support the plantation and PNF sectors of the forestry industry.

### **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**

---

I believe that the active management of state forests is *essential* in NSW to maximise the delivery of a range of environmental, economic and social outcomes in NSW. The Forestry Act underpinning the management of State Forests provides a broad range of active forest management options than is available on other public tenures such as National Parks, which allow many more benefits to be realised. These include: timber production, recreation opportunities, grazing, apiculture, and other forest products.

In addition, the State Forest estate is considerably larger than any other private holding in NSW, which provides the economies of scale that are essential to support efficient timber production

## Submission template

across time and space. These economies of scale are essential to underpin value-adding by local businesses and allow competitively priced timber products to reach the market. This provides local job opportunities and stimulates local economies, particularly in regional NSW.

These economies of scale also work for other land management responsibilities, such as road and trail maintenance and fire management. Professional staff engaged in managing the broad areas of State forest across NSW can develop and deepen their land management skills and move resources around as needed. In NSW, this has promoted a culture of stewardship of the land and helps to ensure efficient and effective active management of forest which improves the environmental, economic and social outcomes.

If you take active management of State Forests off the table, all of these benefits are lost or at the very least, severely compromised. I urge the Panel to develop the FIAP to support active management of State Forests and to support the State forest manager, Forestry Corporation of NSW. This is the *only* way to maximise delivery of the full range of environmental, economic and social outcomes and provide options for diverse management of forests in NSW.

### **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 Intergovernmental Panel on Climate Change (IPCC) has recognised that a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained climate change mitigation benefit<sup>6</sup>.

Closer to home, a study of the greenhouse gas implications of managing large areas of native forest for production in southern and northern NSW concluded that native forests managed for production provide the greatest ongoing greenhouse gas benefits, when long-term carbon storage in products and product substitution benefits are considered<sup>7</sup>.

The science is clear. The existing forestry industry must be supported if we are serious about mitigating greenhouse gas emissions.

Furthermore, there are opportunities right in front of us in NSW. The forestry sector could be optimised to further improve the carbon equation through relatively minor adjustments such as supporting industries to utilise more of the residue materials into fibre products and bioenergy. We should be making more things out of timber and wood fibres to realise more of the benefits

---

<sup>6</sup> [www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg3-chapter9-1.pdf](http://www.ipcc.ch/site/assets/uploads/2018/02/ar4-wg3-chapter9-1.pdf)

<sup>7</sup> Ximenes, F. d., George, B. H., Cowie, A., Williams, J., & Kelly, G. (2012) *Greenhouse gas balance of native forests in New South Wales, Australia*, Forests.

## Submission template

for climate change mitigation, local economies and to support increased employment in regional NSW.

It has been shown that forestry can be managed to provide significant benefits to the environment, community and industry while increasing the sequestration and storage of carbon. However, for these outcomes to be achieved, forestry management needs to operate under a clear, consistent, and stable framework of operation and oversight which are conducive with these aims. Such a framework must be based on best-practice science, not ideology.

I urge the Panel to develop the FIAP to better support active forest management to deliver sustainable volumes of timber and wood products which will increase sequestration and storage of carbon. Please don't allow the opinions of passionate but misinformed activists to set the agenda and undermine the principles of sustainable forest management. This would only cause the NSW community to lose out on all the benefits the forestry industry does, and can provide.

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](mailto:forestryiap@ipcn.nsw.gov.au) for assistance.