

NAME REDACTED

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

Native forest logging is not sustainable both financially nor ecological.

Financially: Logging of native forest is costing NSW taxpayers dearly, in 2019/20 Forest Corporation NSW received a whopping \$246.9 million in grants. Despite this, the hardwood native forest logging division managed to make a loss of \$28.2 million dollars.

In 2020/21 the loss was \$20 million and in 2021/22 \$9 million. Shutting down this unprofitable business would make sense. If forestry was a private business, it would have long been busted. NSW taxpayers would save between \$45 million (Cross et al. 2023) and \$62 million (Frontier Economics and ANU 2021) annually. There is no economic argument that supports this ecocidal venture.

Ecological: The logging cycle has reduced over time, with loggers targeting forests at shorter cycles. This results in loggers targeting increasingly younger trees in the absence of older, larger trees. The dire consequence for the many hollow dependent wildlife is that those species are left without hollows to breed and find habitat in. This means extinction for them.

NSW has 46 mammals depending on hollow bearing trees- older trees, 81 bird species, 31 reptiles and 16 frog species. Hollows usually form within 100-150 years, but not many trees reach this age due to logging.

The endangered Greater Glider relies on hollows that have formed over a century for breeding. The conflicting and overpowering interests of the logging industry have resulted in the removal of protections for key habitat across the landscape. The few remaining regulations intended to protect endangered species are being ignored by the state run logging corporation. They continue to log den trees and fail to find them (<https://www.abc.net.au/news/2024-07-24/nsw-government-forestry-corporation-illegal-logging-allegations/104126534>). The failures are systemic. A judge called 'Forestry Corporation of NSW has 'a pattern' of illegally damaging the environment' (<https://www.theguardian.com/australia-news/article/2024/jul/31/forestry-corporation-of-nsw-has-a-pattern-of-illegally-damaging-the-environment-scathing-judgment-finds>)

No hollows, not Greater Glider. Logging intensity and the need for wildlife habitat are not and have not been compatible for decades. Wildlife in NSW has been on a constant decline as consecutive reports on the State of the Environment have shown: 'The number of species listed as threatened in NSW continues to rise. These species are at the greatest risk from threats including vegetation clearing, the spread of invasive species and the mounting impacts of climate change.' (<https://www.soe.epa.nsw.gov.au/key-findings>)

Additional pressures of climate change will make forests more vulnerable to catastrophic fire risks. 'The condition of most native vegetation continues to deteriorate. Since the Black Summer fires of 2019,20, 62% of vegetation in the fire zone is under pressure from too much burning.' (<https://www.soe.epa.nsw.gov.au/key-findings>)

Logging is a major contributor to fire risk making forests drier (Lindenmayer and Zylstra 2024) and more flammable. Forest debris left on the floor also adds substantially to the increased catastrophic fire risk. The 2019/20 bushfires would not have been as severe if the forests had

been intact. But logging opened vast areas of intact forests up, turning them into fire accelerators that ignited surrounding forests and contributed to the severity of fires across the state. The IPCC reports confirm that climate change brings hotter and drier summers, resulting in formerly known 'once in a lifetime events', becoming common place. The continuation of native forest logging makes our forests less resistant to increased fire risks. We are basically turning up the heat, adding to the already dire situation.

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

Forests deliver many services, that are vital for our own survival. They clean air, filter water, retain soil, generate rain and cool the land. They remove carbon dioxide from the air and store it in their wood and in the soil below them. If we want to reach our Carbon emissions goal by 2030 to remove 43% of carbon from the atmosphere, we need the help of our forests. Carbon emissions need to be reduced by around 15.3 megatons each year for the next nine years (Brendan Mackey, Griffith University). Ending logging native forests would get us to this (shamefully) low goal (<https://www.anu.edu.au/news/all-news/stopping-native-forest-logging-key-to-getting-to-net-zero>).

They are vital for personal recreation and are known to improve mental and physical health for humans.

With further degrading our forests through logging we lose the ability for forests to provide these services.

In NSW, 269 species are listed as threatened. Australia has the largest mammal extinction rate in the world. Ending logging the homes of these endangered species would slow down the decline of these species and perhaps deliver a chance of survival. The iconic koala is predicted to become extinct by 2050 unless their habitat is protected. A parliamentary enquiry in November 2022 found that habitat destruction is the main driver for the koalas' decline. Many forest dwelling species rely on connected habitat for genetic diversity.

Forests have important cultural and spiritual significance for indigenous peoples. When NEWRY state forest was being logged, the local Gumbaynggirr people fought hard to protect their sacred land. Police forced them off their sacred land to log the forest. (<https://nit.com.au/31-07-2023/7001/gumbaynggirr-elders-physically-removed-from-sacred-land-in-newry-state-forest>)

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

NSW housing and construction does not rely on native forests. All construction needs are being fulfilled from plantation grown timber. Plantations supply enough and high quality and composite timber products required for the housing market.

The use of native forest timber is dominated by low value products. Most logs are being turned into woodchips and shipped overseas to be manufactured into toilet paper or cardboard. A small percentage of native forest timber is used as tomato stakes, crates or pallets. Only about 3-5% is used on high value products such as floorboards or furniture.

91% of timber needs are fulfilled by plantation timber.

As for TRANSPORT- railway sleepers have been substituted by concrete sleepers. Further NSW has moved to use composite materials for their power poles, instead of timber to protect poles from collapsing in further fire situations.

Sustainable plantations, grown as a crop on degraded agricultural land and outside the public native forest estate would reduce flammability of native forests and secure healthy forests into the future.

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

Existing plantations already supply 91% of Australia's timber needs. Investment on degraded agricultural land could provide further security for timber supply. It is important to note, that plantations should be established outside intact native forests to protect the already vulnerable forests from further degradation. Decades of industrial, unsustainable logging practices have reduced our forests resilience against fire, flood and drought.

Ending native forest logging would also remove the need to further subsidise this loss making business. Monies freed up from forest subsidies would boost sustainable timber production. Plantations grow timber faster and deliver more jobs in their management (Cary et al. 2021). However they should not be established in native forest areas, nor should they be a result from converting native forest into plantation.

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

Healthy public State forests would be able to continue deliver services for the public, such as clean water, clean air, carbon storage, soil retention and the generation of rain. There are also jobs available in these protected forests in tourism. Some degraded forests may need weeding management. It is however important to largely leave forests alone and not to engage in 'forest gardening' practices, do post fire 'salvage' logging or even to engage in 'thinning' practices. It is also debatable that 'fuel load reduction burning' practices should be employed (Phil Zylstra)

There is a risk in engaging in any kind of 'management' of our forests. Often they provide a veil for continued logging. 'Forest Gardening' is nothing but a new name for an old industry: Logging. Large areas of forests are being industrially removed, just like the current forms of logging. This impacts forests and forest biodiversity negatively (Murray et al. 2024)

Healthy and restored State Forests will increase the economic value through tourism, carbon storage, job creation and recreational opportunities. The best way to manage forests and to keep their environmental and cultural values save is not to degrade them by logging, including the use of Forest Gardening practices (Murray et al. 2024)

Additionally NSW Forestry Corporation should be wound down, as it is financially unsustainable, relying on government support and yielding less timber compared to managed plantations.

Further, native forest logging as lost it's social license. Only 19% of the population in NSW support the native forest logging industry

(https://www.nature.org.au/polling_shows_majority_support_in_new_south_wales_for_an_end_to_native_forest_logging)

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

Intact and healthy native forests store significantly more carbon than logged and/or continually degraded forests. Preserving these forests contributes to carbon sequestration and helps Australia meet its low greenhouse gas reduction target (see above). Logging native forests releases large amounts of GHGs into the atmosphere. Ending native forest logging would prevent these emissions and contribute to climate mitigation efforts as well.

Including these forests in carbon accounting without engaging in carbon trading schemes could also prevent them from being exploited by the carbon trading industry.

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Intact, unlogged native forests support rich biodiversity, offering habitat to endangered species and promoting ecological resilience (Mackey et al. 2015, Watson et al. 2018).

Encouraging the regeneration of logged or degraded native forests will in turn increase their ability to sequester carbon and restore biodiversity. Forests with higher biodiversity are more resilient to threats of bushfires, extreme weather and even pests.

Native forests are crucial for water and soil retention and filtration. Healthy forests mitigate impacts of droughts and flooding, which are increased by climate change.

NSW can use native forests to mitigate climate change risks while saving taxpayer dollars and protecting these ecosystems for future generations.