

Public submission

NAME REDACTED	Submission ID:	204694
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Organisation:	North Coast Environment Council, Inc.
Location:	New South Wales
Supporting materials uploaded:	Attached overleaf

Submission date: 10/13/2024 8:15:31 AM





Forestry Industry Action Plan

Introduction

The North Coast Environment Council (NCEC) is the peak umbrella environment group on the NSW North Coast, covering the area from the Hunter to the Queensland border and west to the New England Highway. We have numerous community member groups associated with the NCEC, many working to conserve their local environment.

We participated in the CRA/RFA process during the late 1990's in good faith, hoping to see the promised Comprehensive Adequate Representative Reserve system established and genuine Ecologically Sustainable Forest Management undertaken in the NSW Forestry estate. Sadly, the CAR reserve system fell short of our expectations and the concept of Ecologically Sustainable Forest Management has never been realised.

The NCEC and its member groups have all united in calling for the end of logging in our public native forests in NSW and the immediate transition to a 100%plantation-based timber resource.

1 Sustainability of current and future forestry operations in NSW

Australia is a world leader in species extinctions and logging is a major contributor. Logging has significant impacts on an array of species dependent upon native forests by removing critical food, shelter and breeding resources for fauna, direct impacts on plants, roading increasing predator access, disturbance promoting weeds and causing dieback, regrowth drying forests and increasing fire intensity, and erosion causing sedimentation of streams.

Bell Miner Associated Dieback (BMAD) is a very serious threat to forest health which impacts some 100,000 H of North Coast forests and continues to spread unabated with forest disturbance now well established as the primary causal factor. It is initiated by canopy disturbance which facilitates a proliferation of understory weeds (, predominately lantana) which enhances nesting success and survival of the native Bill Miner. The birds soon reach plague proportions and protect their primary food source, the lerp, a sugary secretion of the sap sucking psyllid. The Bell Miners drive away avian predators of the psyllids while their special feeding habit does not kill the insect, which in turn reaches plague proportions killing mature eucalypts. There are areas of severely impacted forests where all that remains are dead stags over a sea of lantana with little hope of regeneration.

In 2005 The NSW Scientific Committee determined 'Forest eucalypt dieback associated with over abundant psyllids and Bell Miners' (BMAD) as a Key Threatening Process. The committee made a conclusive finding that: "Over-abundant psyllid populations and Bell Miner colonies tend to be initiated in sites with high soil moisture and suitable tree species where tree canopy has been reduced by 35 – 65% and which contain a dense understorey."

Yet despite this independent finding Forest Corp continues to log BMAD at risk and affected forests to 50% or more canopy removal with little effective follow up weed control to even attempt to mitigate the problem. This can hardly be considered Ecologically Sustainable Forest Management.

If Forest Corp practices continue on the current trajectory there will be very little left of our public forest estate for future generations to enjoy. That trajectory includes over estimation of available timber yields leading to supply contracts which cannot realistically be met. A continual weaking of rules to protect the environment, such as stream and habitat buffers and slope limits at every opportunity and an increasing industrialisation, mechanisation and intensification of logging operations as allowed in the current Coastal IFOA's that cannot lead to sustainable outcomes.

It is time to end public native forest logging immediately and immediately transition to a 100%plantation-based resource

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

The non timber values of our forests far outweigh the profits to be made by a few at the expense of the wider community. They include habitat for a whole range of forest dependent plants and animals, massive stores of carbon and protection of our catchments to regulate hydrological processes and provide clean water.

Many of these values were severely impacted by the extensive 2019-20 wildfires where over a billion native animals are thought to have perished. The loss of hollow bearing trees will significantly impact Threatened, hollow dependent species for many decades and many local populations may never recover. Catchment values were destroyed by the fires in many areas through massive sedimentation and may take decades to recover. Yet in this climate biodiversity extinction crisis Forest Corp seeks to maintain business as usual.

The cultural values of our public forests to first nations people are many and varied. Traditional pathways and song lines traverse the landscape and evidence of aboriginal occupation is abundant. The NCEC tries to work closely with traditional owners and frequently has their support in out efforts to protect the forests.

Many in the wider community appreciate the aesthetic and recreational values of our forests which are compromised by industrial logging. Public native forest logging has an ever diminishing social lisense with the overwhelming majority of the community opposed to the practice.

The North Coast Environment Council frequently engages independent ecologists to assess Forestry Corporations logging operations impact on our forest values and threatened species. Over the years, we have discovered ongoing failures to comply with regulations meant to protect these values and with submitting these findings to the appropriate agencies are deeply concerned that the processes put in place to ensure compliance seem to have failed the people of NSW.

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

The NCEC recognises that there are many alternative materials that can supply the housing, construction and other sectors. Recent developments in processing plantation pine can produce structural beams of similar strength and durability as hardwood beams. Composite fibreglass telegraph poles are becoming preferred over hardwood poles as they are both termite and fire resistant. Even concrete fence posts are becoming preferred by farmers for the same reason, particularly since the black summer fires destroyed so many hundreds of kilometres of wooden fence posts.

There is increasing desire by brands like Bunnings and their consumers who are looking for products that have a sustainable chain of custody. The timber industry has their own set of standards that glosses over the fact that their products might come from our public native forests where prime koala habitat is logged against regulations. People need to have faith in their choices to pay extra for sustainable products and the current models are letting them down.

All our research tells us that the logging operations run by Forestry Corporation have not been sustainable for quite some time and the NCEC has signed on with many other organisations calling for an end to native forest logging and immediate transition to a 100%plantation-based resource.

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

With Forestry Corporation operating at an ongoing loss to the NSW State Government and it's taxpayers by not being able to meet the wood supply agreements highlights how our forests are no longer able to deliver these unreasonable demands being put on them.

The current plantation estate supplies some 90% of our construction timber and has a fundamental role in meeting future timber needs when we abandon public native forest logging. Currently much of our plantation resource is exported as woodchips and even whole logs. This resource should be kept for domestic processing and use.

Better silvicultural management of our hardwood plantations such as better selection of species to match site conditions, early removal of defective trees optimum thinning and longer rotation times could produce much higher quality sawlogs.

Private Native Forestry could have some role in supplying future specialty timbers. However, the current PNF regulations and codes need considerable improvement to ensure ecologically sustainable outcomes.

The current desk top approvals provided by Local Land Services has failed to adequately ensure the protection of Threatened species and other environmental values.

Only Threatened species listed in the wildlife atlas or bionet on the property are considered for protection. Endangered Ecological Communities except for Rainforest and Old Growth are mapped as protected with other EEC's left to the discretion of landholder whether they even exist on the property.

PNF approvals should require independent Threatened species surveys and site-specific conditions imposed to protect environmental values. Slope limits should be reduced and stream and drainage line protection improved.

A Development Application through local government should be required the same as any other high-risk activity is required to undertake.

Owner of High Conservation Value forests should be provided adequate financial incentives to protect high conservation value areas in perpetuity on a voluntary basis.

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.

Forestry Corporation continues to fail in delivering the required environmental or economic outcomes. Last year alone, Forestry Corp. operated at a \$26 million dollar loss and fined \$360,000 for just one breach. The hidden costs are the impacts on our threatened species

and climate change. The majority of scientists believe koalas will go extinct in NSW by 2050 with habitat destruction and climate change the driving factors.

Forest Corp should have no role in managing the public native forest estate. They should only be involved in the management of plantations including research and development of sustainable plantation outcomes and providing advice and expertise to private plantation owners.

A new Government Agency should be established to administer the restoration and ongoing management of the public forest estate. First nations people should have a key role in this endeavour which would also provide meaningful employment and training to both indigenous and non-indigenous people.

The NCEC sees the ending of public native forest logging as the only solution to deliver a wide range of environmental and socio-economic outcomes.

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.

There are huge opportunities to meet our climate and biodiversity commitments through immediately ending native forest logging.

Our old growth forests store massive amounts of carbon in standing biomass as well as in soil. Logging liberates much of the standing biomass into atmospheric carbon dioxide in a relative short time as well as depleting soil carbon and drying the forest. Logging machinery and transport add further to greenhouse gas emissions. Dense post logging regrowth further dries the ground through increased water use to heighten the risk of wildfire

Old growth trees provide the large hollows so critical for the survival of much of our forest fauna, particularly since so much of this habitat was lost in the 2019-20 wildfires. Old growth forest is less susceptible to canopy fires and provides shelter for canopy dependent fauna during wildfire events which are expected to become more frequent as the climate continues to heat.

Leaving all of our public native forests to grow old naturally and actively managing them for conservation can contribute significantly and increasingly towards meeting our climate and biodiversity commitments. However, carbon and biodiversity credits accrued from preserving our public native forests should not be used to offset fossil fuel or land clearing endeavours as this would be counter productive to beneficial environmental outcomes.

The best way to save our biodiversity and reduce our carbon footprint is to exit native forest logging. Using our forests to generate electricity will have leave us with a deficit in storing carbon. It takes decades for logged forests to store carbon at the critical level we need now to tackle the impacts of climate change. It's predicted that extreme fire and weather events could decimate our forests if we don't act now.

The Northeast Forest Alliance is one of our member groups and they have compiled a document that highlights why we need to exit native forest logging. You can find this document online at:

https://assets.nationbuilder.com/ncec/pages/19/attachments/original/1726714380/Logging_of Public Native Forests Needs to Stop.pdf?1726714380

The NCEC acknowledges the work of NEFA in compiling this information and support the call for an immediate end to native forest logging. The NCEC recognises that the jobs impacted should be considered and incentives for diversifying the production of alternative materials listed below should be implemented to make the transition fair to those whose jobs will be impacted by the exit of logging our public native forests.

- 1. Bamboo. Bamboo is an ideal renewable building material that has been used for centuries.
- 2. Hempcrete
- 3. Recycled Steel
- 4. Reclaimed Wood
- 5. Rammed Earth
- 6. Recycled Glass
- 7. Straw Bale

Our forests are too valuable to us in storing carbon, giving us rain and making us more resilient against climate change. If we want to address our extinction crisis, we need to save our threatened species habitats. The NCEC urges the Forestry Industry Panel to determine an exit of native forest logging as the best way forward to manage our forests into the future.

Regards,

Secretary North Coast Environment Council