Public submission

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

NSW native forests have existed for millions of years, they are climate resilient. 50,000+ years of regular man made fires had changed forest species distribution, tree density, age and size. Australia's forests are -man modified.

The current forest cover in many areas is similar to that of pre European coverage, the exceptions being sites predominantly used for cropping. Some areas now forests were woodland pre 1770. Harvesting of native forests in NSW over the last 170 years has not resulted in any species extinction , rather enhanced ecological diversity.

All logs now harvested are regeneration from earlier harvests and this cycle can continue indefinitely with existing forest industry practices.

Active forest management ,including harvesting ,enhances protection from the biggest threat to sustainability, hot uncontrolled fires. Thinning of native forests, cattle grazing and a network of good roads have shown to be of great benefit in reducing the potential for hot fire damage. It is well established that a 50% reduction in fine fuel results in a 50% drop in the rate of fire spread and a 75% reduction in heat intensity (CSIRO 1960).

National Park areas are not as regularly cool burnt for fuel reduction as State Forests or many private native forests and thus suffer more hot fires. These hot fires can kill flora and fauna on a large scale and can set in train a process of forest decline which leads to more hot fires. Regeneration methods successfully simulate natural processes / with predominantly selective harvest methods in summer rainfall areas and more broadscale (clearfall) methods in winter rainfall areas.

Forests that are not actively managed , eg National Parks are the ones most likely to be unsustainable in maintaining a healthy forest cover and diverse ecosystem in the long term.

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

Regular cool burns by Aborigines over thousands of years resulted in a grassy understorey and a low stocking mature overstorey. This favoured grass eaters such as wallaby and emu but kept koala densities low (they prefer the high nutrient leaves of dense regrowth).

Subsequent lack of regular cool burning in native forests has led to dense stands susceptible to drought and fire deaths. Severe fire is the biggest threat to many species .

Cool fuel reduction burns were standard forestry practise on State Forest for decades until global warming concerns made them much more expensive and difficult to do. This -lawfare. was done deliberately to thwart good forest management on State Forests.

Not only are cool burns needed for fire protection but are essential for forest health, such as soil chemical balance eg avoiding high aluminium and nitrate levels.

Subsequent forest decline has been most marked in areas only subject to hot burns, many on National Park. The intense fire has damaged both flora and fauna , a contrast to many State Forest areas which had run cattle and significantly reduced the fire hazard.

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Hot burns increase soil exposure and hence erosion as well as favouring the regeneration of species that themselves encourage more hot fires. These species dominate in places where Aborigines have not been for thousands of years such as Kangaroo Island, SA, and make them very fire prone.

Cool burns will retain the species mix that existed in pre European times . They will also remove fire sensitive weeds such as lantana which dominate the understorey of many north coast forests. Given that over 50,000+ years , Aboriginal people would have walked over, dug up , hunted and burnt the same area probably thousands of times, it is inevitable that some cultural items eg graves, canoe trees will be found. State Forests has for many years hired Aboriginal people to locate these sites and exclude them from harvesting.

However, the lack of frequent cool burns particularly in National Parks is a direct repudiation of Aboriginal cultural heritage values as well as poor management.

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

The unique wood characteristics of NSW native species (hardness, stability, durability and colour) supply high value niche markets that can only be substituted with imports or non wood products. High prices for these specialty products, (primarily flooring, decking, plywood, poles and girders), bring significant employment and wealth to regional NSW. In some areas, the timber industry is the largest manufacturing industry.

The NSW native forests product markets in housing (new and renovation) and construction (wharves, bridges etc) are likely to continue whilst there is wood available. Any reduction in wood supply is likely to result in an increase in imports (flooring ,decking, plywood) and non wood substitutes (flooring, decking, bridges and poles). Low new house demand often coincides with a rise in renovation timber markets with consequent demand for native forest species being relatively stable.

This market stability has allowed the special skills required to process the native species (especially wood seasoning) to be retained through good times and bad. However, once the industry is closed , these skills are lost and it is difficult to start again.

Demand for mining timbers has greatly decreased and is not generally seen as a future market. Transport of wood products from country towns to cities is often a backload for products (eg groceries, whitegoods) that are carried from the city to regional areas. This helps reduce the costs of many items in country towns.

Retail sales of native species has been depressed by green propaganda and resulted in significant import substitution from areas of poorer environmental practise. Retailers are very susceptible to public threats by green groups.

It should be noted that for decades, green groups, cheered on by much of the media have maligned the native forest timber industry. Because closing the industry is a green iconic issue, green lies and exaggeration have been pursued not to save the forest but rather to ensure power and money. When I have talked to green leaders about this, they readily admit they need to lie and exaggerate otherwise they would not get attention.

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

Softwood plantations supply about 80% of sawlogs in Australia , primarily for low value structural products such as house framing. This is expected to continue, albeit with some supply glitches resulting in younger and hence weaker wood which may lack the required strength. Hardwood species have inherent high and differential wood shrinkage which is not overcome until trees are at least 25 years old depending on the species. Hardwood plantations generally can

only supply high value markets after age 35 when there is enough valuable wood to make harvest viable.

There are exceptions but unlike softwood plantations which can be grown over a wide range of soil types, hardwood species have site specific requirements limiting their broad application. The site and age restrictions (plantation viability drops away after 40 years) will limit hardwood plantations ability to substitute for high value native forest products.

Low value products such as pulpwood will be needed to provide thinnings markets although stand alone plantations for these products could be viable in some areas.

New plantings are limited by the high cost of cleared land and joint ventures with landowners seem out of favour with investors.

On the North Coast of NSW, private native forests provide between a third and half the native forest log volume with the balance from State Forests. Private supply is particularly important for small mills as well as an income source for landowners and contractors.

It is also an important buffer for the industry where political decisions are made against optimal long term log supply by State Forests . For example, transferring State Forest areas managed on a long harvest interval into National Park shortens the harvest interval on the remaining State Forests. This has reduced wood quality as well as yield.

The bureaucratic encroachment on private native forest management is following the trajectory of State Forests / more restrictions and higher cost impositions. Much comes from government and it is totally unjustified and part of the green aim to close the industry

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

Already some 88% of State Forests and National Park in NSW is reserved from harvesting. And yet, the State Government claims "more than 800 species are under threat" (source NPWS docs) and that the Great Koala National Park is needed as " to save the koala from extinction" (source Minister Sharpe).

Why is the State Government reserving more land when by its own admission it has failed in the 88% already reserved ? Is the remaining 12% sought to prop up these poor policies and practices? Is private native forest then going to be sought next for the same reason? This suggests a land acquisition program to cover bad management.

State Forests has some of the best forest knowledge and practises in the world. For example harvested areas have the same or up to 3 times more koalas than on adjacent National Parks (they prefer younger high nutrient leaves). Why jeopardise this success when koalas risk the fate of koalas already in National Parks - periodic hot fires , poor forest health and seesawing populations ?

State Forests has been beset with unwarranted regulatory costs that have no benefit to the environment but are imposed as part of a green agenda to make the industry unviable. Do we need to document car parking for the disabled at log dumps? State Forests need to be freed from these ridiculous impositions so the focus can be on optimal forest management.

Harvesting native forests for high value solid wood products stores carbon for the long term and means high CO2 emitting substitutes such as concrete and steel are not required. Sawmilling residues are used to generate electricity at several facilities.

A younger forest age structure in State Forests is complementary to the older age structure in National Parks.

Timber retailers and end users have been put under intense pressure by the green movement . This pressure is passed onto sawmills and pole suppliers some of whom are now more interested in a favourable industry exit ie large payout from the government rather than a long term forestry future. Whilst understandable, it is an important reason why industry is not more public in its support . This safety net does not apply to the smaller mills and contractors.

Despite the green lawfare and harassment of employees and contractors, State Forests does a remarkably good job. Forests are well managed and well documented .Environmental standards are high. Industry supply has been largely maintained with its high economic multipliers (for every 1 person employed in the forest, another 3 or more are employed in processing and associated activity). Rural towns have a manufacturing base with sawmills and other processors providing meaningful employment and consequent social benefits.

The cost of managing forests is under \$20/ha/year in State Forests whilst around \$80/ha/year in National Parks. Why should the taxpayer be financially penalised when State Forest is converted to National Park and possibly for poorer environmental outcomes as well?

Regular cool burns need to be done in all our native forests (rainforests and cypress excepted) to protect the ecosystem and adjacent assets and people. This has been standard forestry practise in many areas for many years and if it is to be renamed an -Aboriginal forest management model., well so be it. The important point is that it is done professionally rather than some pretend indigenous employment scheme.

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

Carbon and biodiversity credits are available when carbon sequestered or biodiversity increases from an (arbitrary) baseline. Three scenarios are compared.

1, Cleared land provides the best scope to accumulate credits as carbon is sequestered converting grassland to forest and biodiversity measures (eg species numbers, frequency) increase.

2, Cool burns and native forest harvesting result in a small increase in CO2 emissions and an increase in biodiversity as pioneer plants and animals reestablish after the fire and harvest. Over time increased growth sequesters more carbon until another harvest and cool burn occur. The emissions in harvesting , haulage and processing logs into say flooring are less than 10% of the embodied energy of the wood. The mill residues are used for energy generation , with transport to the power plants less than 5% of the embodied energy.

The substantial emission offsets are achieved however by using for example, harvested wooden power poles versus concrete, steel or fiberglass poles.

3, A National Park with cool burns will have no emission offsets from harvesting and one that has periodic hot burns could have emissions greater than sequestration. Collateral damage with hot burns is tree decline with extensive overstorey mortality allowing the dominance of shorter lived trees and weed species.

If stands in National Park are mature eg greater than 80 years old, then decay internally (pipe), could be similar to sequestration in which case there are no credits to be made. This decay is higher than in a thinned (harvested) State Forest as unthinned trees are more stressed and thus more predisposed to decay. Mortality is also higher in unthinned stands when droughts occur. Both decay and drought death will reduce carbon credits.

Mature stands do not change much in species diversity but over time can favour or depress the numbers of individuals.

As an example, the north coast from the NSW/Qld border to the Hunter Valley can be described as islands of cleared land in a sea of (native) forest. The proportion of cleared land is quite small (and high value) and thus the main potential to accumulate carbon credits is in the native forest areas managed for solid wood products.

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It should also be noted that the cleared area on the north coast peaked 100 years ago. Since then, large areas of cleared land have reverted back to native forest .This happened largely without any specific regeneration practice or indeed carbon credits.

These formerly cleared areas have supplied high quality logs in repeated harvests, some on State Forests and some private property. Some blocks were cleared, grazed, regrew, and harvested and then claimed as National Park for their high forest conservation values. A testament to good forest management that also shows many environmental values can be created.

Biodiversity credits have a one off increase when cleared land (mainly grassland) goes to regrowth . The change from regrowth to old growth may increase or decrease diversity (species numbers) and will also be a one off event.

Harvested areas will provide regrowth that supports a different range of species eg pioneer species, to mature stands in National Park and other unharvested areas such as riparians , steep country etc.

The ecological values are complementary and show the benefit of the current position of a mix of harvested (State Forests, private native forest) and non harvested land (National Park). Monetising carbon and biodiversity benefits runs the risk of compromising management of the forests.

For example, cool burns which emit CO2 may be prevented if carbon offsets have been sold. Biodiversity benefits sold to urban or overseas clients may also compromise other less favoured species . For example high koala numbers may be the result of a dying forest that produces many epicormic shoots, rather than a sustained population that the forest can support.

Monetising carbon and biodiversity may also be a backdoor way of privatising state assets and threatening sovereignty.

Already some crown assets such as Mt Warning exclude the vast majority of the population from being able to climb it despite it being Government land. It is easy to see Governments signing agreements with Aboriginal groups who then exclude all except for a select few.

The Aboriginal groups could be a front for banks and other financial outfits who would sell carbon and biodiversity credits, including to overseas buyers. Australian citizens may then be excluded physically and financially. Already, multinational financial entities such as GFANZ have been established to do just this.

A more sustained outcome is for harvesting and cool burning to continue on State Forest and private native forest with public multiple use on State Forests.

Thinning of regrowth to avoid overstocking and cattle grazing (the modern megafauna) will enhance forest value and fire protection.

Forestry is a long term activity which benefits from active management. We are fortunate that our forests have been well managed for production and environmental values and that this can continue indefinitely with sound policy.