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

NSW and Australia needs a long term sustainable and future focused multi-faceted timber industry to meet the needs of growing State and National population. From a strategic and moral perspective Australia should be meeting its hardwood requirements from within its own borders, rather than using imports to fill the gap in supplies. Sadly, this is not the case, and we are importing a larger proportion of our hardwood needs every year to fill a gap in supply which is strongly related to domestic political decisions. Decisions based around acquiring preferences within our short-term election cycles, not the long-term viability of our timber needs. These political decisions are removing production forests from harvesting and placing an ever-increasing percentage into reserve systems locked away from active forest management.

There are many sound reasons based around product usage, as to why NSW/Australia should be growing a sustainable native forest industry to meet our domestic needs. The high value durable hardwood timber used in utility poles, marine piles, girders and high-quality housing products used in new builds and restorations, are still mostly drawn from native forest operations. These products are difficult to replace from plantations due to the rapid growth rates required in plantations largely precludes their development in such stands. So, to highlight the importance of NSWs/Australia's need for sustainable current and future native forestry operations I will limit my answer to hardwood product used in new home builds. Specifically, the new home builds required just to keep pace with the needs of our growing population. The following information is taken from the Australia Bureau of Statistics (ABS) and other reputable public access industry sources. Not someone's opinion, or the publishing of highly vocal group or individual.

Over the past 50 years Australia's population has increased by over 200% (12.5M to over 26M). Our current rate of population increase is approximately 2.2% and likely to grow. At this rate we will likely reach a population of over 50 million by the middle of this century. Of the current 26 million people who live in this country, approximately 60% are of working age, and therefore those who are looking to buy and own a home. Using the official ABS figures and a 2.2% population increase this translates to an increase of a little over 350,000 people in the working-class age bracket this year alone. This equates to a required 240,000 new homes just to meet the growth needs of the country this year (ABS figures). And if we apply the 2.2% growth to this new home requirement, we show that we will need a further 245,000 homes next year.

From the latest census data there were only 163,836 new homes constructed. That represents a bit over a 117,500 shortfall in new home completions his year alone. This was the lowest new home establishment figures since 2012, and the trend has been downwards for over the last decade, not up. These figures do not account for the deficit in homes that already existed at the start of 2023. Just to point out how bad the situation is, there were estimated to be 122,494 people homeless on the night of the last census.

To meet the obvious deficit in dwellings the Australian government has suggested it intends to build 1,200,000 homes by 2029. The Governments own literature notes that this will be insufficient to meet the current shortfall along with growth, but it is an ambitious target none the less. The long running Forest and Wood Products Australia (FWPA) study finds that on average

14.3m³ of timber is used in the average build in Australia. Although this volume is skewed in favour of softwoods, it is estimated that at least 20% of this is hardwood timber product. That equates to at least 3m³ of hardwood per build. Using the government's own figures this means we will need about 3,500,000 m³ of sawn hardwood product to meet the housing needs of the nation over the next 5 years. More interestingly, to meet the deficit of 117500 new home builds last year, Australia would have needed to acquire (from somewhere) a little over 350,000m³ of high-quality sawn hardwood today.

Against this we see a definite decrease in hardwood production within Australia. The Australian Bureau of Agriculture and Resource Economics and Science (ABARES) 2019 report shows in the decade preceding 2017, native forest production more than halved, going from 9.1 million cubic meters to 4.2 million cubic meters. This downwards trend has only continued in the years since and been greatly exacerbated by recent decisions in Vic and WA. For example, FWPA statistics show the volume of hardwood imports into Victoria increased by nearly 40 per cent since the Andrews Government announced the closure of native forestry. Furthermore, the volume of sawlog and high value products such as poles and girders coming out of hardwood plantations are not going to fill the gap. The 2005 Federal Government review of the state of hardwood supplies in this country found that at the (2005) rate of hardwood plantation establishment, sawlog productions from plantations would not match that drawn from native forest operations until at least 2050. This report predated the collapse of the Management Investment Schemes (MIS) in the later part of the same decade.

So where is the increasing shortfall in our domestic consumption coming from? ABARES 2019 report shows that Australia is a net importer of processed high value wood products including wood-based panels, sawn wood (including Quelea and Merbau decking and flooring) and miscellaneous forest products (including window frames and staircase timber). Australia also imports significant amounts of secondary wood products (mostly furniture). Of this imported volume, most of Australia's hardwood imports are coming from Brazil Indonesia, Malaysia, China and the USA. Of the locations we draw our shortfall from, 86 per cent of imports are coming from countries with a worse environmental index than Australia (the Yale Environmental Index). Therefore, NSW/ Australia needs a sustainable native forest industry now and into the future because it is the only truly moral way we can approach our domestic needs. If we consume it, we should produce it here. Not offshore our consumption to other parts of the globe with less stable political systems and much worse environmental controls. In the words of Natasa Sikman (The outgoing CEO of the Australian Forest Products Association) "it makes no sense that we are closing down our own sustainably managed state-based native forestry industries while imports of the products they produce are growing steeply. Furthermore, our national forestry plantation estate is also declining when we know national and global demand for the products they produce is growing sharply,"

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

The heading for this topic is somewhat vague. Therefore, in providing an outline of environmental and cultural values of forests, I am going to assume that forests mean State Forests (SF). I am also going to assume the topic is aiming to draw out the benefits arising from the more actively managed estate of a SF, as they compare to lands managed under a National Parks (NP) model. To further focus in on these values I will concentrate on those values which will be diminished or lost should the SF within the footprint of the proposed Great Koala National Park (GKNP) be converted to management under the State's NP reserves system. Numerous cultural and environmental values are better managed under the multiple use management regime of a State Forest, when

compared to the significantly more restricted management model applied to lands under a National Parks.

Environmental values better managed under SF as opposed to a NP management regime.

Many of the flora and fauna species listed as threatened in NSW/Australia are highly disturbance related and are suffering because of the lack of disturbance within their natural range as an ever-increasing proportion of the landscape is placed into the reserve system. In this way their natural environment is less disturbed on a less regular basis as harvesting is removed from the management regime and fire is actively restricted with the continual move away from wide area indigenous burning regimes of the past.

Oleria flocktoniae, *Macrozamia johnsonii*, *Boronia umbellata* and *Parsonsia dorrigoensis* all examples of highly disturbance related species, common across the State Forests within the footprint of the GKNP, and which are becoming progressively less common within the National Park estate within the same area. Outside of the impact of the 2019/2020 fires, these species are far more common across the areas State Forests than they are within the areas National Parks. This can be clearly seen by simply viewing the NSW BioNet Atlas records for the last 5 years on the Environment and Heritage website. In part this may be passed off as being related to the need for Forestry Corporation of NSW (FCNSW) to undertake extensive flora and fauna surveys in association with their operational activities where the NSW National Parks service is not so constrained. However, given the massive investment in the "Save Our Species" program (The NSW Government flagship threatened species conservation program) across the NP estate since the 2019/2020 fires, this argument is somewhat nullified. The real reason for there being more records for these (and many other disturbance related species) appearing within the current State Forest estate is these species need disturbance as a critical part of their life cycle. The fact that FCNSW is required to conduct intensive threatened species surveys in association with any operational activity, where NSW NPs are not, adds weight to the benefits of environmental values being better managed under and State Forest management regime,

Cultural values better managed under SF as opposed to a NP management regime.

Australian society is an intricate mix of cultures drawn from around the world that has developed into what we know as "Australia Culture" today. Although important to Australians, Aboriginal cultural heritage values are only part of the great cultural value that areas of SF contribute to our culture. Being a modern western society, our culture values a myriad of benefits we know intrinsically as being Australian. The following are just some of these values which will be greatly diminished or lost all together where land within the GKNP is transferred from SF to NP.

- Aboriginal cultural heritage values of SF. FCNSW's Aboriginal Partnerships team's role builds relationships and partnerships with local Aboriginal communities and elders for mutually beneficial outcomes. These partnerships and relationships provide training and access for Aboriginal community groups to learn and practice cultural activities such as cultural burning and provides access to dedicated areas (via Forest land permits) to enable community groups to set up and hold cultural camps, workshops and tourist ventures (both commercial and non-commercial). Many of these activities and ventures would not be allowed within the guise of NP management, or at the very least be severely restricted when compared with what is allowed on SF. Unlike on a NP estate, Aboriginal community groups can collect resources free of charge including timber for firewood, spears, digging sticks as well as bark for making traditional canoes and shields.

- Camping in the great outdoors is a prominent tradition across our society providing recreational outlets for many. In SF in NSW people are allowed to camp anywhere for up to 2 weeks just so long as they don't damage the area and obey any fire restrictions in place at the time. Provided they are not precluded due to bush fire restrictions at the time. People are allowed to have a campfire wherever they camp, again as long as they make sure it out when not attended. Such free camping is not permitted within the NP estate.

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- Rally Driving events (local car clubs through to international events). These types of activities are not condoned within the NP estate but are welcomed within the SF estate.
 - 4-wheel driving and trail bike riding. Although allowed in a very limited and restricted manner within the NP estate, it is not seen as the mainstay of this management approach. Whereas recreational 4WDing and trail bike riding is encouraged within SF. The area within the footprint of the GKNP is one of the premiere 4WDing and trail bike riding destinations between Brisbane and Sydney, bringing thousands of tourists to the area each year and contributing millions to the local economy.
 - Disabled access to the bush. Although there are a limited number of disabled access locations around the fringe of some of our NPs, they do not allow access for disabled people to the bulk of the area managed under NPs. Again because of the significantly greater public access roading network across and area of SF it offers disabled people far greater ability to move into the landscape and immerse themselves in the bush.
 - Family picnics at waterholes on rivers. As with the above point, rivers accessed within areas of SF offer better access for disabled people to access the waterway, as well as for people who want to enjoy an outing by the water with their pets. An example of this within the area of the GKNP is The Never Never River which is by far the most heavily visited freshwater recreation area during summer within the GKNP footprint. It's visitation rates far outweigh those for any river side recreation area within NP inside the GKNP footprint. If this area is placed within NP, the change in its management protocols will quickly limit those who can enjoy this area at any time they wish. Those that visit will also likely have to pay for the privilege, where they currently do not.
 - Horse riding and dog walking. These activities are not usually allowed within area managed by NP. There are a few limited areas in NSW managed by NSWNP under the guise of a State Conservation Area (SCA) which do allow very limited areas for these activities, however they are no where near as extensive and free as those that exist with SF. These limited areas are also usually user pays, where SF is free.
 - Events: the breadth and scope of the type of events allowed permitted with SF (under license) but not permitted (or greatly restricted in scope) within NP is large. These range from Adventure Racing and equestrian events through to 4WD events and music festivals and including everything in between.
 - Specialty locations: These are often overlooked when considering the question of loss of amenity to the community if and area of SF is converted to NP. These specialty locations can include areas for rifle, shotgun and pistol clubs to operate shooting ranges through to the importance of honey to our economy, an often-overlooked aspect of SF. The honeybee industry is critical to Australian agriculture and is worth more than 14 Billion dollars annually to our economy (ABS). Noting that 70% of the honey produced in Australia relies on native flora for pollen supply. Much of this is sources from SF. Apiary as an agricultural practice is permitted within some areas of NP provided it is viewed as compatible with the park's conservation values and the needs of other park users (NSW Environment and Heritage website). However, in practice land tenure changes from SF to NP over recent decades within the footprint of the GKNP have seen a dramatic reduction in the area where bee hives are allowed to be managed. It is likely this trend will continue within the confines of the GKNP. The same is likely with any other special purpose use.

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

This point has already been extensively answered at point 1. Again, if we consume it here, we should produce it here.

Demand for all timber products is exploding worldwide. At the same time Australia's timber production areas are shrinking. This is most noticeable in the hardwood timber space. Using figures drawn from the Australian forest and wood products report for the last quarter of 2018, native forest timber production fell by 2% in 2017 alone, and this predated the closure of the Vic industry. Over the same year the area of planted hardwood plantation fell by 1.4% nationally. The same report shows Australia's production from native forests fell by over 50% in the decade proceeding 2017. None of this points to the reserves of hardwood timbers increasing, instead they are in decline. This in no way matches our projected increased demand for these products over the coming decades.

As was highlighted previously and above, the balance of self-reliance vs importation of hardwood products use in Australia / NSW has been tipping ever more solidly in favour of importation. Bring the question back to the GKNP and the impact of further land transfers from SF into NP. Durable hardwood timbers, used in utility poles, marine piles, and high-quality housing and restorations, is a resource found largely in North Coast NSW State Forests and contributes to the 43,272 m³ specialty products such as poles, veneer and piles, along with over 222500m³ of sawlog quality timber. Obviously, any change to this estate which further reduces the area of native forest available for harvesting, or that increases controls which further limits timber extraction will have a negative impact on the supply of hardwood products. This lowering of supply will only further exacerbate the current demand for hardwood timber products as they relate to NSW housing, construction, mining, and retail.

Again, I highlight the words of Natasa Sikman (The outgoing CEO of the Australian Forest Products Association) "It makes no sense that we are closing down our own sustainably managed state-based native forestry industries while imports of the products they produce are growing steeply. Furthermore, our national forestry plantation estate is also declining when we know national and global demand for the products they produce is growing sharply,"

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

Yes, they are contributing, but they are failing to keep pace with demand, and consequently the deficit in supply is growing.

Looking at ABARES 2019 report we see that Australia's total commercial plantation area was 1,942,700 hectares in 2017-18, a decrease of 12,400 hectares (down 0.6 per cent) from 1,955,100 hectares in 2016-17. The total area of new plantations established in 2017-18 was 3,150 hectares, comprising softwood and hardwood species planted mainly in Western Australia. In 2017-18 the total area of softwood plantations was 1,037,000 hectares, an increase of 100 hectares from 2016-17. The total area of hardwood plantations was 896,000 hectares, a decrease of 12,500 hectares (down 1.4 per cent) since 2016-17. Softwood plantations accounted for 53 per cent of total commercial plantation area and hardwood plantations constituted 46 per cent. Mixed plantations and unknown species made up the remaining 1 per cent.

The majority of Australia's annual total log harvest originates from commercial plantations. The remainder is sourced from native production forests. In 2017-18 commercial plantations accounted for 87 per cent of Australia's total log harvest by volume and native production forests contributed 13 percent.

All this is very confusing, so simplify let's look at the best performing area of forestry, the softwood plantation estate. This time taken from the Forest & Wood Products Australia 2022 report. This report states that by 2050 Australia will have a sawn softwood demand of 6.507 million m³ per annum, but only a sawn softwood production of between 3.600 and 3.800 million m³ per annum. This is projected to leave a gap of about 2.638 million m³ per annum, equivalent

to 40.5% of total demand. Similarly to this ABARES (2019) estimates that Imports of softwood sawn wood will need to double between 2020 and 2050 to satisfy growing demand. Therefore, if the current trend of reducing native forest production continues, the establishment of new hardwood and softwood plantation estates needs to dramatically ramp up if it is to fill the void. This is currently not happening, its stagnating (softwood plantations) or going backwards (hardwood plantations). Turning this around will cost billions and require decades of concerted and unwavering political commitment. An unlikely eventuality due to the short term focus political system.

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

Through its adoption of a multiple use land management strategy to manage landscapes, State Forests can maximise the delivery of a wide range of environmental economic and social outcomes. This is especially evident when one compares the land use options of an area of land if it were to be operated under the guise of a NP or SF. During the planning phase for the dramatic increase in the NP estate at the expense of SF estate proposed under the NSW Carr Government, an independent report was undertaken comparing the economic and social benefits of given area of land if were managed by NP or SF, if timber production was excluded. This report found that when excluding the economic and social benefits of timber harvesting, a given area of SF generated 300% to 400% more economic and social benefits to the local community. There have been numerous reports following the same pathway since, and they have all come up with similar findings. The reason for this is obvious and is highlighted in my reply to dot point 2. There are more options for land use and for people to interact with the landscape under SF management, when compared with that of a NP.

Things which contribute to this maximization of social and economic outcomes by retaining landscapes with State Forest and not converting more area into National Parks include

- Free camping,
- General 4WDing and trial bike riding,
- Grazing permits and leaseholds,
- Apiary permits,
- Events such as rally driving, 4wd events equestrian, dog sledding and adventure racing,
- Recreational activities such as horse riding, and dog walking,
- Firewood collecting,
- Disabled access,
- Specialist club locations such as firearms ranges,
- Fossicking such as gemstone collection and gold,
- Hunting,
- Conducting scientific research (under license),
- Tree felling training and emergency services practice,
- Military training activities,
- Traditional and cultural activities that require access to natural raw materials.

Because of this ability of people to more fully interact with their environment under a State Forest model, it is very important that we maintain sufficient area of SF in the landscape for people to gain these social and economic benefits. Failure to do so will result in a degradation of this social amenity and therefore a social loss.

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

In line with the focus of my preceding answers, one of the best ways to support a positive social outcome around carbon and adaptation to climate change is to limit the distance goods are transported to meet a society's needs. In line with this, products that are produced and sold locally have a significantly lower carbon footprint than those that are imported into the country. Ensuring that forests that are available for timber production are located across the state is imperative in ensuring that this carbon footprint remains low. Further to this point, ensuring that we in NSW and Australia produce the timber products we use locally and do not import them from other countries, reduces transport costs and reduces the products carbon footprint. Additionally, it is well known that timber has the lowest carbon footprint of all the most common building materials used in Australia. Much of the arguments used as justification for closing down Australia's native forest timber industry centers around the belief that timber products such as power poles and timber framing for houses can be substituted for with alternative products. The problem with these arguments is that all the realistic options for product substitution in place of timber center on products which have a significantly higher carbon footprint than the timber product they are replacing. These include composite power poles and steel framing for houses. It does not seem to matter to those making these arguments in support of closing down the timber industry that they themselves are fervent believers in the threat posed by anthropogenic sourced carbon dioxide in our atmosphere. Hypocrisy writ loud.