

### **Public submission**

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

My submission relates to the Hardwood Forestry operations of NSW Forestry.

I have concerns with both economic management and ecological sustainability of the Hardwood (Native) Forests "managed by NSW Forestry.

As background, I have experienced the poor stakeholder "forest neighbours" management operations and attitude by NSW Forestry with their operations in Tuckers Nob and nearby State Forests. I have seen the impacts of Forestry operations on water quality, plus experienced noise, dust and fire smoke, and seen massive animal species habitat destruction and movement caused by this habitat loss. I am sure many submissions will provide detailed insights on this important ecological and environmental matter, which needs to be taken seriously given the ESFM (ecologically sustainable forestry management) criteria Forestry NSW are required to follow. I do not believe NSW Forestry focus on the social / community and ecological aspects of their mandate adequately enough, and they also fail to meet the economic objectives they have as evidenced by the recurring financial losses they make in the hardwood division.

I have a financial background and have read the NSW Forestry Forest Management Plan June 2002 to July 2027. On page 6 it states "The Forest Resource Management Evaluation System (FRAMES) models and informs strategic planning processes and decision making in NSW State Forests. The purpose of FRAMES is to model availability of wood products over time .....". Section 8.2.3, further on in this report, has further information about this seemingly important planning and operational system known as FRAMES. A Case Study is also included in the report outlining the importance of FRAMES in terms of wood supply - I assume both quantity and quality /type of timber is relevant.

Concerningly, but perhaps not surprisingly given the poor financial management record of NSW Forestry Hardwood Division, yield reconciliation work (ie. comparing realised volumes with predicted volumes, and I assume quality / type of timber) has not been done. Section 8.2.3.2 clearly states "Due to spatial limitations of FRAMES, yield reconciliation has not been attempted in the aftermath of the 2019-20 bushfire season, and subsequent floods in 2021 and 2022. Forestry Corporation remains committed to yield reconciliation and will commence this work when conditions allow." This is appalling in terms of financial management and accountability - all private businesses, public enterprises and organisation need data and systems to manage their operations and outcomes, and also need to adjust these when external factors impact. How is the NSW Government and NSW Forestry operating without any factual data on output versus expected output? How can any planning for future supply, and delivering this without understanding what is actually occurring "in the field" (ie. in the harvested forests) in terms of outputs?

I have no confidence in NSW Forestry, in all area of their mandate - ie. economic, social and environmental. My concerns re dubious facts (and published rhetoric) presented by NSW Forestry need to be carefully considered by the Panel.

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

State Forests adjoining National Parks, and State Forest operational access via National Park roads need better management to capture "whole of eco system". At present a State Forest / National Park boundaries are based on "fencelines and survey markings" created in years past. It would be better if areas were mapped and managed according to land forms, waterways, flora / fauna habitat, etc. For example a tree on one side of a fence can be logged with a similar species tree 10 metres away on the other side of the boundary being protected due to its location in a National Park. Both trees could home endangered or non endangered species, but one will be destroyed while the other will remain for many future generations. Bizarre!

Future planning and operations of NSW Forestry need to manage to ecological principles, not land areas determined by historical boundary lines.

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

My submission is concerned with Hardwood plantations. I understand that only a very small portion of hardwood timber harvest is used in residential housing. Furthermore hardwood used in pylons and poles has substitutes (concrete, steel, plastics, etc), some of which are lower cost, more readily available, and more sustainable.

A significant output of hardwood harvests is "fence posts / palings, pallets and low grade sawlogs". All these low value products have economically and environmentally better substitutes. Ceasing direct and indirect subsidies to NSW Hardwood Forestry Operations and redirecting some of these funds to alternative industry and employment is likely to be strategically and environmentally superior in the long term. I also know that a very high proportion of hardwood plantation "harvests" are burnt on site as distance from ports and markets make other use (eg. chipping) impractical.

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

Hardwood Plantations, provided they are clearly plantations (this is often a deeply debateable and diversive point in some cases), and managed effectively (environmentally and commercially), with clear and transparent communications with all community stakeholders, is generally fine. However in the case of numerous (Hardwood Native) State Forests in Northern NSW this is not

However in the case of numerous (Hardwood Native) State Forests in Northern NSW this is not presently the case. Hence changes and better management is required.

Private Native Forestry should not be subsidised. Other "rural" crops are not subsidised, so why should timber be an exception?

Softwood Plantations is important and sustainable and appear to be well managed economically. It produces an important product for housing.

# 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

I have significant concerns with NSW Forestry managing effectively to its objectives of ecologically sustainable forest management (ESFM).

The background and principles of ESFM are outlined in the NSW Forestry Forest Management Plan June 2002 to July 2027. The report (p15) makes points about "maintain the ecological process", "preserve the biological diversity", "obtain for the community the full range of environmental, economic and social benefits from all forests within ecological limits", etc. Principles of ESFM are also noted - eg. "maintaining forest values for future and present generations", "ensuring public

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participation, provision of information, accountability and transparency in relation to the carrying out of financial operations", etc etc.

ESFM Strategy is then explored in the report in Section 2.3 - words such as "biological diversity, sustainability of forest ecosystems, health and vitality of native forest ecosystems, soil and water quality, ecological sustainable management" etc etc are used extensively.

My major concern is that all these words and phrases (rhetoric or propaganda) is in conflicts with the true aim of NSW Forestry which is to harvest as much timber as possible as cheaply and quickly as possible to deliver short term financial outcomes. This is not surprising given the shareholder of NSW Forestry (ie. NSW Treasury) expect a positive financial outcome, but in reality the costs (environmental and social impact) are not sustainable. The effective direct subsidy to NSW Forestry Hardwood division by all NSW taxpayers, plus indirect subsidy to those in hardwood related forestry industry, is not sustainable.

In summary I have low confidence in NSW Forestry delivering a range of sustainable (ie. recurring) positive economic, environmental and social outcomes for all NSW community members.

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

I do not have any views on this topic, other than the current system of biodiversity credits, including a non transparent market, is bureaucratic and has confusing and sometimes conflicting policy between regions and departments. Obtaining clear, credible, and transparent information re carbon and biodiversity credit schemes is very difficult. It seems to be prone to potential exploitation by the canny few, with many current and future NSW taxpayers funding the current deficiencies in systems and policies.