

SCOTT MELHUIISH

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

Native forest logging is not sustainable, and NSW should stop all logging operations in native forests.

Logging in native forests targets mature trees, removing habitat for koalas & other threatened forest wildlife species. Although we are often told about trees being planted to replace those that are logged, replacing mature trees with new saplings is in no way a 'like for like' replacement. Also, when logged areas are replanted with new trees, the area can be considered to be plantation rather than native forest, and it loses protection. The total area of unlogged native forest in NSW continues to decrease.

Research estimates that 29 million hectares of the forests and woodlands that existed in New South Wales pre-1750 have been destroyed. That equates to the loss of 54% of the state's original forest – an area larger than New Zealand.

A further 9 million hectares or 16% of forest and woodland is degraded, and only 30% of pre-European colonisation forest and woodland in NSW is still intact.

'The impacts of contemporary logging after 250 years of deforestation and degradation on forest-dependent threatened species'

<https://www.biorxiv.org/content/10.1101/2023.02.22.529603v1.full>

Logging NSW native forests is obviously unsustainable when this research shows that 70% of pre-colonisation forest & woodland has already been destroyed or degraded.

Current levels of logging are not sustainable and result in the removal of protections for key habitat. Continued logging will likely contribute greatly to the extinction of forest dependent wildlife.

A report published by the Nature Conservation Council in November 2023 found that the taxpayer owned logging business Forestry Corporation NSW 'received \$246.9 million worth of grants since 2019/20 financial year, while the hardwood division (which is responsible for native forest logging) made a loss of \$28.2 million over the same period.'

https://www.nature.org.au/forestry_corporation_28_million_loss

The full report by Frontier Economics is titled 'Public native forest logging: a large and growing taxpayer burden'.

<https://www.frontier-economics.com.au/public-native-forest-logging-a-large-and-growing-taxpayer-burden/>

Obviously, if the Native Forest hardwood division of Forestry Corporation was a private company, and made a \$30 million loss after being given \$250 million in funding from its parent company, it would not survive, but would be shut down by any responsible economic manager. Native forest logging in NSW is financially unsustainable.

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

Mature & old growth native forests provide vital habitat & refuge for many threatened species, one of the most iconic of which is the koala.

Public native forest logging in NSW is a major driver of deforestation pushing many threatened species further towards extinction. Native forest logging impacts species such as greater gliders, yellow bellied gliders, quolls, swift parrots, sooty and powerful owls.

When the tree canopy is removed, humidity is reduced and the area dries out. Undergrowth, ferns, mosses & lichen are unable to grow as they do in a mature native forest, and vegetative cover disappears from the area, allowing excessive erosion, and soil transfer into the local streams & waterways. Platypus can be affected because of the degradation of waterways, and the follow on effects of the lack of invertebrate life in streams that are muddied by erosion run-off caused by the loss of vegetative cover caused by logging.

Logging removes koala feed trees & habitat. The NSW Upper House Koala Inquiry found in 2000 that 'the fragmentation and loss of habitat poses the most serious threat to koala populations in New South Wales.'

(Finding 4, page xii, 'Koala populations and habitat in New South Wales)

<https://www.parliament.nsw.gov.au/lcdocs/inquiries/2536/Koala%20populations%20and%20habitat%20in%20New%20South%20Wales%20-%20Report%203.pdf>

The Koala Inquiry also found that 'the future of koalas in the wild in New South Wales cannot be guaranteed unless the NSW Government takes stronger action to prevent further loss of koala habitat.'

(Finding 5, Ibid)

A widely reported finding of the Koala Inquiry was that 'without urgent government intervention to protect habitat and address all other threats, the koala will become extinct in New South Wales before 2050.'

(Finding 2, Ibid)

The NSW Government has not intervened to protect koala habitat, but has continued to log native forests and degrade koala habitat in many parts of the state.

The NSW Koala Strategy has a stated aim of doubling koala numbers by 2050, but it is obviously failing because in the 4 years since the Koala Inquiry Report was published, Koalas have been downgraded from Vulnerable to Endangered in NSW.

Possibly the most alarming is the failure by the current Premier Chris Minns to act on his election promise to create the Great Koala National Park (GKNP) on the Mid North Coast. The area for the proposed GKNP is home to 20% of NSW's koalas, so protecting these forests is critical to ensure koalas don't become extinct in NSW.

In the lead up to the March 2023 election, Chris Minns stated "'When you see a situation where koalas have gone from not threatened to vulnerable to endangered to potentially extinct by 2050, we've got to take action".

<https://www.abc.net.au/news/2023-01-19/labor-great-koala-park-national-plan-grafton-to-kempsey/101871048>

Since coming to power, the Premier Minns led government has not created the Great Koala National Park, and rather than put a moratorium on logging within the proposed area whilst decisions on the national park are made, has allowed native forests in the area to continue to be logged. Protection has been put in place for 5% of the proposed Great Koala National Park, but logging is continuing in other parts of the proposed area.

Penny Sharpe defended the continued logging in the proposed GKNP by stating in an interview on 'The Project' on Channel 10 published in September 2023, 'We didn't say that we would do a moratorium on logging'.

(YouTube - NSW Government Under Fire For Logging Proposed Great Koala National Park)

<https://www.youtube.com/watch?v=6fhFY52oKGE&t=162s>

However, it's clear that continuing to log the area that was the subject of an election promise to create the Great Koala National Park is a broken promise.

Any unbiased person who hears the promise of a Great Koala National Park will understand that promise to include the intention to not log the area before turning it into a national park. For Premier Chris Minns & Environment Minister Penny Sharpe to state that their pre-election promise to create the Great Koala National Park included the intention to log the area before turning it into a national park is disingenuous doublespeak, and has created a serious loss of trust in those who believed the words of Chris Minns before the 2023 election.

Many other threatened species also depend on native forest habitat for their survival. Logging native forests is a direct attack on the threatened species that dwell in them.

Forestry Corporation states that that counting male mating calls proves that logging native forests does not harm koalas populations in logged native forests. However a report published in Australian Zoologist in June 2024 shows that this methodology does not prove what Forestry Corporation claims.

'Koala density, habitat, conservation, and response to logging in eucalyptus forest; a review and critical evaluation of call monitoring' by Andrew Smith and John Pile can be found at:

<https://drive.google.com/file/d/1gj1UNaRz368gkP6jaXXDfpGMmMhbB7TM/view>

The report states: 'None of the preceding findings are consistent with the NRC (2021, 2022) conclusions that current native forestry regulations that permit the use of high intensity logging enable koalas to maintain their density 5â€“10 years after heavy harvesting.'

'We have previously established that the findings of Law et al. (2022b) apply only to male koalas and not female koalas, but we also consider it likely that these findings for male koalas are partially or wholly an artefact of sampling problems associated with use of remotely deployed acoustic recorders. Because of their large area of coverage (about 25 ha) and long recording duration, there is a high likelihood that acoustic monitors failed to detect real declines in male koala density after logging'

'These findings show that koala survey using call recorders that monitor male calls in the breeding season is not a reliable method for identifying koala habitat or response to logging.'

"Since 2020 the EPA has started and/or completed more than 50 formal investigations of Forestry Corp's compliance, often after receiving complaints from the local community. More than 30 of these investigations have resulted in enforcement action so far, with fines and other costs totalling over \$1.7 million."

<https://www.unitearthweb.org.au/2024/09/24/new-book-profiles-logging-breaches-by-forestry-corporation/>

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

Native forests are not needed for the housing industry, as plantation timber already provides the vast majority of timber used in housing in NSW.

Plantation timber can supply high quality timber products for a range of needs.

Composite power poles are preferable to timber poles, are more fire resistant, last longer and need to be replaced less frequently than timber power poles, and are therefore more economically viable in the long term.

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

Hardwood and softwood timber plantations already provide over 90% of Australia's log production.

Only 5 per cent of native forests that are logged become timber â€“ the rest is pulped and turned into cardboard, woodchips and sent overseas.

There is already plenty of cleared land that could be used to expand hardwood plantations for future needs.

Investment in hardwood plantation on already cleared land would supply timber products into the future

Shifting to higher-value plantations can better meet timber needs.

The millions of dollars in subsidies currently propping up the native forest industry should be transferred into investment in plantation timber production, and a just transfer of native forestry workers into the plantation timber 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

Healthy native forests filter water & provide clean water resources, long-term carbon storage reduced impacts on climate change, and healthy social outcomes from the opportunity to spend time connecting to nature.

Traditional Indigenous land management was truly sustainable over many thousands of years, and should guide the way our forests are managed. Indigenous cultural burning was 'cool' compared to modern 'hot' methods of hazard reduction burns, and did not have the same devastating impact on wildlife that modern methods of fire management do.

Aboriginal forest management also provides the social benefit of sustainable work for indigenous communities, and the cultural benefit of connecting with Country.

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

Native forests logging in releases excessive amounts of carbon, contributing to climate change, and prevents forests from recovering.

Keeping native forests intact is essential for reducing the impacts of climate change like bush fires and drought.