

# Public submission

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**Organisation:** *South East Region Conservation Alliance*

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**Supporting materials uploaded:** *Attached overleaf*

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

See attached PDF file

## **Submission to the Independent Forestry Panel**

This supplements the oral submission that I made with the Panel Consultant on 30 September 2024. My focus is on the woodchipping industry of the South Coast, although much of the content applies more widely to other parts of NSW.

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

Woodchip exports from Eden are now roughly 30% of what they were 15 years ago. This reflects both reduced production capacity and declining markets. From regular peaks of over one million tonnes per year following the Regional Forest Agreements, a steady decline began. In the last 2 years, exports have crashed. While some of the cause is linked to the Black Summer bushfires, when 80% of native forest on the south coast available for logging was burnt, the main cause is that Japanese and Chinese paper manufacturers have virtually ceased buying Eden woodchips. This trend was happening well before the bushfires. In 2023, Chinese paper manufacturers started to drastically reduce importing woodchips and buying pulp instead.

See: <https://www.timberbiz.com.au/navigating-the-currents-of-australias-hardwood-chip-sector/>

It is not just that it's cheaper for paper manufacturers to import pulp than woodchips, it is a way of ensuring a consistency of quality in their supply chain.

The crash in Eden woodchip exports to China - beginning last year - is entirely consistent with this explanation.

In 2023, Taiwan actually became the biggest market for Eden chips. This year, while China is again the biggest buyer but it's still very small - just 4 ships in 9 months. In former times, there would have been at least twice that many.

Many compartments have been logged repeatedly, producing smaller logs, lower yields and destroying valuable wildlife habitat.

Young regrowth forest has little or no chance of containing tree hollows which are essential for the survival of endangered species such as the Greater Glider, Yellow Bellied Glider and the large forest owls.

Tree hollows require about 100 years to form, so a logging regime based on short rotations is effectively condemning these species to extinction.

Higher risk and intensity of bushfires associated with logged forest also reduces number and diversity of wildlife.

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

Repeated, intensive, industrial logging for woodchips bears no resemblance to the use that First Nations owners once made of the forests.

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

Export woodchipping drives all logging of native forests on the south coast. It produces little timber that might have a structural use in housing.

Since 2021, the Pentarch Group has held a monopoly on all wood supplied from the Eden Region and most logs produced in the Southern Region.

Pentarch produces some wood pallets which might be used in freight transport, but there are other ways that these products could be manufactured, such as from recycled plastic. If you go to any of the local tips in the region it is always possible to see significant quantities of wooden pallets assembled there.

Tens of millions of dollars every year subsidise export woodchipping, especially since the bushfires. A 2021 Frontier Economics <https://www.frontier-economics.com.au/comparing-the-value-of-alternative-uses-of-native-forests-in-southern-nsw/> study found stopping logging in southern NSW would produce a net economic benefit to NSW of approximately \$60M from 2022-2041.

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

Hardwood plantations have not been a success on the south coast and the Forestry Corporation no longer owns any. Other parts of Australia, such as the “Green Triangle” have a far better record in establishing and maintaining hardwood plantations and these should take national priority.

One potentially useful change would be to allow some existing hardwood plantations to grow on for longer into sawlogs for processing domestically. Currently, most plantation hardwood is processed as woodchips and exported.

Similarly, the softwood plantation industry is not used for maximum public benefit.

Whole logs have been regularly exported from Eden, but could and should be processed domestically for maximum benefit. More, higher value products could be made available to the Australian market without increasing production.

Softwood plantations are profitable and regularly subsidise the loss making of native forest logging by the Forestry Corporation.

Private native forestry is small on the south coast but the industry currently views it as a means of increasing hardwood production as public native forestry declines.

#### **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**

State Forests have many values, all of which are diminished by logging.

Forests can boost tourism, they can provide recreational and social opportunities as well as improve local water quality, help stop soil erosion, and improve local climate and rainfall, There is scope for a range of opportunities and tenures in addition to National Parks and Flora Reserves once native forest logging has stopped.

Ending native forest logging can play a vital role in enabling Australia to meet carbon reduction and biodiversity protection goals.

Eden has the most intensive logging in NSW, probably equal to the most intensive logging in Australia. Since the bushfires many more wildlife, including the Koala, the Gang Gang and now the Greater Glider have been listed as endangered, with native forest logging stated as a major threat.

For over 20 years native forest logging has been exempt from the principal national environment protection law, the EPBC Act. The federal government announced in

December 2022 that this will change, but exactly how and when is yet to be determined.

## **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**

For many years, the logging industry largely got away with the myth that cutting down trees is carbon positive because, it claimed, the carbon remains stored in durable timber products. This is absolute nonsense, particularly for those sectors of the industry where woodchipping is dominant.

A tree cut down for woodchips becomes CO<sub>2</sub> within 2 years. Even sawn timber products such as pallets have a short shelf life and become CO<sub>2</sub> within a very few years.

Ending native forest logging is the quickest, cheapest and easiest way for Australia to make a significant cut to its carbon emissions. Ending logging of public native forests in southern NSW would reduce net greenhouse gas emissions by almost 1 million tonnes per year over the period 2022-2041