Independent Forestry Panel

Public submission

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SETA Submission to the NSW Independent Forestry Panel Regarding the Forest Industry Action Plan

1 Sustainability of Current and Future Forestry Operations in NSW

1 (a) Regional Forest Agreements

Over 20 years ago, NSW was one of four states to sign Regional Forests Agreements (RFAs) with the federal government. The RFAs were seeking to balance economic, social and environmental demands on forests by setting obligations and commitments for forest management that delivered:

- certainty of resource access and supply to industry – building investment confidence
- ecologically sustainable forest management – ensuring forests are appropriately managed and regenerated
- an expanded and permanent forest conservation estate – to provide for the protection of Australia's unique forest biodiversity.

Aside from a major boost in the area of conservation reserves and a focus on sustainable management of forests subject to timber harvesting, protection of Australia's unique forest biodiversity has not been achieved, as more and more forest has been committed to passively "managed" parks and reserves.

2.(b) Sustainability

As the sustainability of forest operations is not defined in the action plan documents, this submission will use the Program for the Endorsement of Forest Certification (PEFC) definition*: "The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems."*

It is deeply concerning to SETA members that the sustainability scope of this review is solely focussed on public and private native forests and plantations available for timber harvesting and not broader forest estate. To deliver a more holistic perspective to the terms of reference, this submission will provide broader, relevant information.

The NSW National Parks and Wildlife Service (NP&WS) September 2021 Zero Extinctions report states on page 1:

"Across the planet, more than a million species are threatened with extinction.

Our protected areas provide a vital refuge for many of these threatened species.

In New South Wales (NSW), around 85% of all species threatened with extinction are represented on the national park estate. Most are endemic to Australia or NSW – found nowhere else in the world.

However, even on the NSW national park estate, the future for these approximately 800 species is threatened by feral animals, weeds, altered fire regimes, the impact of climate change and other threats."

On page 2 it further states: *"There is evidence that the overall decline in biodiversity in NSW is occurring even in the national park estate. Key threats affecting threatened species populations in national parks include feral predators and other feral animals; invasive weeds; changed fire regimes; and a range of impacts associated with climate change. On park declines are occurring, or have occurred, in a range of threatened species including small- to medium-sized mammals, woodland birds, koalas and gliders, frogs and a range of plant species."*

Current conservation reserve management does not appear to be meeting the sustainable forest management outcome envisaged under the RFAs.

1 (b) Barriers to Sustainable Forest Management

1 (b) (i) Key NSW and Federal Environmental Legislation is Rooted in Paradigm of Terra Nullius That Precludes Active and Adaptive Management

The Australian and NSW environment legislation, regulations, policies and guidelines generally fail to recognise that burning by Aboriginal people was the key management activity, that shaped the Australian biota in existence prior to 1788. This failing has been highlighted in an October 2022 research paper authored by Laming, Fletcher et al, aptly titled *The Curse of Conservation.*

https://www.mdpi.com/2571-6255/5/6/175

The introduction notes*: "Protecting "wilderness" and removing human involvement in "nature" was a core pillar of the modern conservation movement through the 20th century. Conservation approaches and legislation informed by this narrative fail to recognise that Aboriginal people have long valued, used, and shaped most landscapes on Earth. Aboriginal people curated open and fire-safe Country for millennia with fire in what are now forested and fire-prone regions."*

High intensity mega fires are a growing threat to sustainable forest management on all land tenures and transferring more state forest to the conservation reserve system will more likely increase, rather than reduce this threat to sustainable forest management and biodiversity in general, in part due to the loss of fire fighting machines and skilled operators.

A major rewrite of environmental and fire management legislation is needed, to recognise the role of fire in the evolution of the Australian biota since the arrival of the Aboriginal people in Australia. The legislation must encourage active and adaptive management principles.

1 (b) (ii) NSW Environment Regulator is Focussed on Punishment, not Active and Adaptive Forest Restoration Post Megafire Disasters

There must be more flexibility for management of invasive native species, particularly after mega fire events. For example, in early 2020, a land owner, had more than 180 hectares of their property (native forest, native grassland and improved pasture) burnt by a high intensity bushfire burning from the adjoining national park.

Over two years after the bushfire, an explosive mix of bracken fern, black wattle and other shrubby vegetation had grown on parts of the property. The landowner undertook slashing of less than one hectare of this regrowth vegetation. Black wattle is acknowledged by the

regulator and being an invasive native species. Regrowth of thousands of this species per hectare can effectively choke out other more delicate and often threated annual or perennial flora species.

Unfortunately, the land owner did not know that to remove this invasive and potentially harmful native species requires approval of the Local Land Services Department. This breach of the current "environmental" law resulted in a waste of thousands of dollars of government money in investigation time and the imposition of a $220 fine.

While the fine is of relatively little consequence, the hours of inspections and interviews resulted in the trauma of the January 2020 fire storms being re-lived by the landowner. Based on previous experience, mechanical and other forms of removal of invasive native vegetation, including black wattle and pittosporum will actually benefit other native flora. Less invasive native flora species will not be smothered by these invasive native weeds. This highlights the bureaucratic, nature of the NSW environmental regulatory framework, with a total lack of any active and adaptive management tools or reasonable discretion by authorised officers.

The current approach to environmental management of most threatened plant species revealed during preharvest and other surveys, typically involves:

(a) The discovery of a threatened species by survey or casual observation;
(b) Any possible management action that created the opportunity for this plant to grow, such as disturbance due to harvesting, fire break maintenance or fire, is ignored;
(c) An exclusion zone of minimum 20 metre radius for understorey plants and hectares for overstory flora species is immediately put in place;
(d) Monitor/ignore the threatened species until it dies and the species moves one individual closer to extinction.
(e) Don't do any meaningful research or trials and assume the implementation of formal or informal reserves will "permanently protect" part of an ecosystem that developed under broadscale active management under Aboriginal management.

In Queensland, the Australian Environment Foundation (AEF), a private conservation land manager undertook habitat manipulation that would likely require an EIS or be immediately disallowed in NSW. In summary, the AEF removed invasive woody understorey, including rainforest species from mature blue gum forest. Understorey shrubs had displaced a grassy understorey. Mechanical and chemical shrub removal followed by implementation of low intensity fire regimes, restored a grassy understorey. This was a necessary action to allow for the reintroduction of Northern Bettongs to their former habitat.

This is an active and adaptive management approach, that is desperately needed in NSW. Instead, the NSW Environment Department did not send out trained ecologists to provide advice to landowners on environmental restoration following private native forest being decimated by the 2019-20 megafires. Instead, officers monitor satellite images and other channels. Any potential activity, including approved operations are inspected by enforcement officers. Prosecutions for" offences" that pale into insignificance, compared to the megafire environmental devastation, caused by the megafires are launched. These measures waste time and money and delay desperately needed recovery operations.

1 (b) (iii) NSW Political and Departmental Decisions Driven by Activist NGO Campaigns

For over 40 years, activist non-government organisations (NGOs) have used native forest harvesting as a key fundraising tool to raise their political and government agency influence over native forest policy.

The current commitment to the great koala national park is a recent example of activist NGO scare campaigning, using out of date expert elicitations or population guestimates to pressure politicians on the alleged need for more national parks to protect koalas. It has not yet been revealed environment department bureaucrats to ignore the latest and much higher estimates from a koala population review by CSIRO. Using out of date guestimates rather than more recent monitoring derived data would provide more justification for the great koala nation park (GKNP) proposal and the addition of koalas to the list of species covered by the severe and irreversible impact guidelines. See section 6.5 of the Biodiversity Conservation Act 2016.

Why do bureaucrats and others never ask, if state forests have been managed for multiple uses, including timber production for over 100 years, why do these forests need to be "protected" in national parks?

In 1977, NSW had 1,596,147 hectares (ha) of national parks and reserves or about 16 percent of the potentially available public land. By 30 June 2023, the area of parks and reserves had grown, to 7,934,000 million ha, a 478 percent increase.

Despite this massive increase in "permanently protected" areas activist NGOs continue to decry the alleged impact of harvesting on the less than ten percent of public land available for harvesting on 20 to 50 year cycles. Campaigns are supported by point in time photos and emotive captions to provoke an emotional response in the general public and create political influence. Political activists then use this misleading view of the forest industry to misinform the public, environmental bureaucrats and ministerial policy decisions.

As stated above biodiversity is declining in national parks, more national parks do not appear to be the solution to reversing the ongoing decline in biodiversity values. Most of the activist NGOs and their associates in academia and the media, also decry the value of regular broadscale low intensity burning across the broad forest landscape.

Despite major deficiencies in the influential fire research over the past decade, it has still passed the peer review process and neatly supports the view that any burning should be concentrated close to human assets. This simplistic view of fire management is totally disrespectful of the tens of thousands of years of cultural burning practiced by Aboriginal people.

It condemns the broader forested landscape to repeated, biodiversity devastating, high intensity megafires. These megafire and the heavy ground fuels and dense understorey will continue to drive an increasing number of delicate flora and fauna species to extinction.

Some research has sheeted home the increasing impact of megafires on climate change giving underperforming fire and land management agencies an excuse for declining levels of low intensity burning over the past two decades See the table below.

SOURCE: RFS ANNUAL REPORTS			AREA OF FUEL REDUCTION BY BURNING & MECHANICAL MEANS (Ha)										
Year	Cost of RFS ($'000)	Fire Mitigation ($'000)	RFS*	BFMC/PP	NP&WS	FCNSW	Crown Land	Councils	Other Govt Agencies	Total FR	Total FRB Only #	Percentage of 20 Million Hectares	Aircraft Hire ($'000)
1999-2000	$84,129			474,009						474,009	355,507	1.78%	
2000-01	$93,200			569,586	19,733					589,319	441,989	2.21%	
2001-02	$179,218			550,122	31,703					581,825	436,369	2.18%	
2002-03	$240,989			415,120	42,827	54,504	20,624	938		534,013	400,510	2.00%	
2003-04	$141,074			178,776	65,451	75,540	2,801			322,568	241,926	1.21%	
2004-05	$152,269		24,390	12,627	36,377	36,403	943	22,652	883	109,885	79,378	0.40%	
2005-06	$177,519		15,759	3,647	32,026	38,008	1,286	31,387	1,388	107,742	71,861	0.36%	
2006-07	$253,294		13,003	8,892	23,840	43,716	911	25,495	1,385	104,238	78,012	0.39%	
2007-08	$223,312		19,517	21,656	49,514	30,719	2,503	10,464	9,701	124,556	98,198	0.49%	
2008-09	$247,234		26,443	8,897	60,117	30,652	2,456	12,304	8,908	123,335	103,686	0.52%	
2009-10	$316,080	$7,207	44,531	16,758	95,673	36,216	5,786	16,091	4,181	174,706	154,504	0.77%	
2010-11	$307,470	$12,040	14,717	7,398	58,092	10,884	4,195	31,573	5,491	117,633	74,858	0.37%	
2011-12	$286,771	$6,507	28,748	9,702	49,791	19,703	8,677	34,757	15,583	138,211	89,884	0.45%	
2012-13	$374,110	$10,226	26,408	13,220	209,594	21,468	4,955	20,310	11,945	281,492	252,734	1.26%	
2013-14	$412,051	$6,877	40,319	10,819	114,154	7,259	4,222	16,066	4,702	157,222	136,102	0.68%	
2014-15	$311,185	$4,253	25,957	8,936	116,251	2,165	3,770	15,707	5,329	152,157	130,911	0.65%	
2015-16	$326,590	$5,724	34,282	11,348	205,889	34,022	8,188	14,864	11,089	285,401	264,927	1.32%	$ 4,267
2016-17	$357,679	$8,432	7,929	7,906	86,942	17,332	5,391	19,030	4,045	140,646	115,223	0.58%	$ 29,355
2017-18	$371,370	$8,077	18,531	10,047	102,121	9,054	7,216	14,887	4,302	147,626	129,472	0.65%	$ 38,405
2018-19	$585,122	$8,793	-	6,187	137,764	34,079	3,794	9,144	8,281	199,248	184,294	0.92%	$ 42,553
2019-20	$993,031	$5,427		5,674	29,400	2,811	4,220	7,742	5,701	55,548	34,189	0.17%	$ 255,510
2020-21	$487,301	$7,837		89,454	55,967	9,581	4,442	8,191	8,864	176,499	161,958	0.81%	$ 7,299
2021-22	$502,006	$14,792		2,639	31,153	3,284	1,002	1,675	5,889	45,642	36,266	0.18%	$ 20,988
2022-23	$663,159	$18,186		4,270	71,768	6,016	1,902	4,254	2,501	90,710	82,393	0.41%	$ 55,433

	FRB Decline Between 1999-2009 & 2010-2023		43%		FRB Decline Between 1999-2004 & 2005-2023	68%	
		Average FRB 2000 - 2009 (Hectares)	230,744		Average FRB 2000 - 2004 (Hectares)	375,260	
		Average FRB 2010 - 2023 (Hectares)	131,980		Average FRB 2005 - 2023 (Hectares)	119,939	
	FR Decline Between 1999-2009 & 2010-2023		50%		FR Decline Between 1999-2004 & 2005-2023	71%	
		Average FR 2000 - 2009 (Hectares)	307,149		Average FR 2000 - 2004 (Hectares)	500,347	
		Average FR 2010 - 2023(Hectares)	154,482		Average FR 2005 - 2023(Hectares)	143,816	

*RFS fuel reduction areas are part of the land management agency totals.

Mechanical FR is not reported separately for 1999-2004.

Mechanical & other means averaged 25 percent of the total area fuel reduced from 2005-09.

Total fuel reduced areas for 2000-2004 have been discounted by 25 percent to provide a conservative FRB only estimate.

The Victorian 2009 Bushfire Royal Commission recommended, from a mitigation of high intensity bushfire perspective, that low intensity burning (fuel reduction) cover at least five percent of the forested landscape. Western Australia has shown over 60 years that low intensity fuel reduction burns covering 8 percent of the landscape are very effective in reducing megafire risk and consequential biodiversity impacts.

2. Environmental and Cultural Values of Forests, Including Threatened Species and Aboriginal Cultural Heritage Values.

2 (a) Comparison of Some Environmental Values Between State Forests and National Parks in SE NSW

Koalas, greater gliders and other fauna species have become icons to justify cutbacks and closure of the native forest industry. Protests and advocacy are used to manipulate government policy decisions including the proposal to establish the GKNP.

Less than ten percent of the total area of crown native forests in NSW, is potentially available for timber harvesting. Just over 80 percent is in the parks and reserve system and the last ten percent is state forest, not available for timber harvesting.

It is ironic that multiple use state forests, after more than a century of harvesting for timber products, continue to permanently protect many threatened and more common species of flora and fauna. A NSW south coast example of the effectiveness of state forest compared

to national parks in providing desirable habitat for koalas is shown in the table below. The table was prepared by the NP&WS, following several years of national park staff and volunteer scat surveys.

Murrah and Mumbulla state forests had two and three times the koala density of the adjoining Biamanga national park. Rather than leave the land under existing management, the good management of FCNSW was rewarded by transferring the management of those state forests to the NP&WS.

Table 1. Number of sites assessed, active sites, occupancy rates by land tenure (2012–14 results in black text; 2007–09 results in blue text).

Tenure	No.sites ssessed		No.trees earched		No. sites with Koala faecal pellets		% of sites occupied	
Biamanga NP	233	128	6990	3840	14	9	6.01	7.03
Gulaga NP	1	8	30	240	0	0	0	0.00
Bermagui NR	30	38	900	1140	1	4	3.33	10.53
Mimosa Rocks NP	120	9	3600	270	13	0	10.83	0.00
Mumbulla SF	229	176	6870	5280	54	38	23.58	21.59
Murrah SF	170	55	5100	1650	12	8	7.06	14.55
Bermagui SF	23	89	690	2670	1	3	4.34	3.37
Tanja SF	28		840	0	2	0	7.14	0
Private Land	78	72	2340	2160	7	2	8.97	2.78
Other Aboriginal Land	6	14	180	420	1	2	16.67	14.29
All National Parks and Nature Reserves	384	183	11520	5490	28	13	7.29	7.10
All State Forest	450	320	13500	9600	69	49	15.33	15.31
Total All Sites	**918**	589	**27540**	17670	**105**	66	**11.44**	11.21

In the Imlay National Park south west of Eden, the remaining 48 Imlay Mallee (Eucalyptus imlayenis) have four years of lignotuber regrowth, following passage of the 2019-20 high intensity “Border” fire. Monitoring of this permanently protected and critically endangered species since it’s discovery by whitefellas in 1977, has seen the population decline from about 80 in 2007 to 48 in 2020.

While the mallee has been permanently protected in the Mount Imlay National Park since July 1972, it sits ever closer to extinction. However, “environmental” registered charities, assorted activist NGOs and their media associates continue to push for total closure of the native forest industry in NSW and Australia to “save” one icon species or another. Meanwhile, hundreds of flora species, genuinely at risk of extinction, in the parks and reserves system lack formal management plans and for others, the plans are not reversing the drift to extinction.

The only evidence of the existence of the critically endangered Long-footed Potoroo *(Potorous longipes*) (LFP) in NSW, was obtained from skeletal remains in fox scats and from hair tube samples collected in state forests during the 1980s and 90s. No LFP were ever photographed. The potential existence of the LFP in these state forests, was a key

justification for the addition of significant areas of state forest near the Victorian border to the South East Forest National Park, as part of the RFA process.

In 2016-17 the NP&WS invested 25,000 camera days and nights surveying the assumed NSW range without photographing a single LFP.

In March 2019, a NP&WS staff member advised: "*The Office Environment and Heritage (OEH) can confirm that the Long-Footed Potoroo samples taken in the 1980s and 1990s were not retained by the consultant. No sample material has been retained by OEH and NPWS.*"

In October 2023, Forestry Corporation of NSW staff took the first ever photograph of a LFP in NSW. This photo was taken in multiple use, including timber harvested, state forest.

On 5 May 2016, the federal Threatened Species Scientific Committee (TSSC) issued a report on the threatened species listing of the Southern Brown Bandicoot (*Isoodon obesulus obesulus)* (SBB). The report contained the following table, that showed a 44% and 47% decline in population of the SBB in a south east NSW national park and nature reserve. The report showed decline of more than 70 percent in an interstate conservation reserve and local extinction in two other reserves.

Available quantitative data are summarised in the table below.

Population	State	Decline
Ben Boyd National Park	NSW	44% (1999 to 2008)
Nadgee Nature Reserve	NSW	47% (1999 to 2008)
Port Campbell	Vic	>70% (past 10 years)
Pines Flora and Fauna Reserve	Vic	100% (extirpated around 2006)
Mt Lofty Ranges – northern metapopulation	SA	100% (extirpated around 2009)

Following assessment of the information, the Committee considers that the southern brown bandicoot (eastern) is continuing to decline across its range. Existing habitat fragmentation exacerbates threats continuing to operate over much of its range, particularly predation by foxes and feral cats, too frequent and extensive burning, and further habitat clearing and fragmentation. All of the available quantitative estimates for recent population trends exceed or approach a 50 percent reduction in numbers over a recent 10 year period (see table above). For

Prior to the release of the TSSC report, local press in south east NSW was reporting that surveys in multiple use state forests showed SBB populations were thriving. Local media also reported on multiple relocations of both SBB and Long-nosed Potoroos (*Potorous tridactylus*) (LNP) from state forests south of Eden to repopulate the Booderee National Park, where these two species had been extinct for decades.

The CSIRO national koala monitoring program April 2024 report provides koala population estimates for NSW, ACT & Qld ranging from 117,050 to 244,440. The Victorian & SA population is estimated to range from 170,780 to 383,570. This gives a national population estimate of 287,830 to 628,010 koalas, which suggests there is absolutely no risk of koala extinction.

The reason there is so much fuss about the NSW, ACT & Qld populations, is the decision of the Threatened Species Scientific Committee to make the one-off use of the provisions of

Section 517 of the Environment Protection and Biodiversity Conservation Act 1999 and split a genetically identical koala species into two species, based on state borders.

This decision has been a boon for activist NGOs to ramp up the use of koalas as a scare mongering fund raising tool. An example of the impact of activist campaigning in potentially misdirecting conservation spending by the NSW government agencies, is provided in excerpts of NSW budget estimate hearings:

- **In the Budget Estimates hearing of 23 August 2022** "**The Hon. PENNY SHARPE:** Thank you. This is probably for Mr Knudson. I want to go to the issue in the budget papers about the threatened species and ecological communities on track. It's page 5-13 of the outcomes statement and it's talking about Saving our Species as the flagship program, which as we've established is the $15 million per year over the next five years. But the thing that I am very concerned about is that previously, at the end of 2020-21, the figures were that 262 species were on track to be secure in the wild. In this year's budget papers, it's down to 150. Can you just explain to me what that actually means? It's pretty concerning from where I sit."
- **Mr JAMES GRIFFIN:** The koala strategy, the single biggest investment in any species—
- **The Hon. PENNY SHARPE:** I'm aware of that $193 million. Thank you, Minister
- **DEAN KNUDSON:** The investment in Saving our Species is $15 million a year—so, $75 million over the five years.
- **The CHAIR:** And yet we've got $450 million invested in visitor infrastructure development, is that right—around about that?
- **ATTICUS FLEMING:** Across national parks, that's correct, over four years.
- **The CHAIR:** Yes, and yet our obligations to protect species from becoming extinct and our visitor obligations in national parks, I would say, are a bit dubious really, aren't they, with regard to our priorities?
- **In the Budget Estimates hearing of the 25 October 2023** - $28.5 million to the great koala national park;

The exchanges above indicate significant environmental expenditure is driven by political responses to activist campaigning over perceived threats to icon species. This results in hundreds of species at genuine risk of extinction getting little or no expenditure focussed on reversing their trajectory to extinction.

This is not a process that allows NSW public native forests to "*maintain their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.*"

Consequently, attention turns to state forests and selected private property to be transferred to the national parks estate to "save" one species or another. This constant undermining of the area of state forest available for timber production has continued to reduce the volume of sawlogs, power poles and other timber products. The area available for a range of recreational activities not permitted in national parks, is has also reduced with flow-on social and economic impacts to local communities.

2(b) Restoring and Protecting Country Using Cultural Burning

The development of the Australian biota is a key cultural heritage value Aboriginal people developed across Australia over tens of thousands of years, prior to European arrival in 1788.

While high intensity bushfires burn without an environmental rule book, managed fire, including cultural burning is governed by the NSW Rural Fires Act 1997, relevant environmental legislation and subsidiary regulation and guidelines. One key regulatory tool for managed fires is the minimum thresholds or return times.

Appendix A sets out the minimum return times applying to the application of fuel reduction burns to various forest and grassland eco systems. This return times apply whether 100 percent of the area has been burnt by a high intensity megafire or 20 to 60 percent burnt by a low intensity cultural or fuel reduction burns.

NSW has lagged behind northern Australia in the reinstatement of cultural burning. However, small programs have commenced and are being led by Local Aboriginal Land Councils (LALCs) and organisations including the Firesticks Alliance.

The NSW government has announced a pilot program that will see traditional owners manage land along key highways at four sites. The pilot program will run for two years and Transport for NSW is open to a state-wide rollout. Trial sites include the Hume Highway near Batemans Bay and Bega.

One south coast LALC has commenced work on the project and almost immediately were frustrated by the whitefella rules that effectively treat all fire as being potentially damaging, regardless of intensity. Part of the proposed treatment area had been partially burnt and was subject to a minimum return time of eight years, so the burn could not proceed across the planned area.

In contrast, an area of forest to the south of the proposed cultural burn was burnt by one of the high intensity megafires in January 2020. In October 2023, the Coolagolite high intensity bushfire burnt through part of the earlier fire footprint. The passage of the high intensity fire though forest burnt 3 years and 9 months earlier was described by RFS Commissioner Rob Rogers, as going “like a knife through butter.”

Despite this totally unsustainable fire regime, fire management authorities have failed to address the growing threat that lack of low intensity burning and increasingly frequent high intensity megafires have on the ecological and cultural values of NSW forests.

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

Despite a major shortfall of housing to buy or rent, timber demand in NSW and across Australia has eased over the past year, due to insufficient building approvals and other factors.

A recent announcement of a major commercial development has highlighted the increasing dependence of NSW and Australia in general on overseas timber supply.

The world’s largest hybrid building currently under construction in Sydney will use European-sourced cross-laminated timber and glulam beams for its 24 timber levels.

Located in Sydney's new Innovation and Technology Precinct, Atlassian Sydney Headquarters will be 180 metres tall and includes a youth hostel occupying the lower levels. To be completed by 2025 and attracting 25,000 workers, the new 40,000m2 world-first commercial tower is a groundbreaking global first.

There has been no announcement as to why European native forest timber cross-laminated and glulam beams were selected over Australian plantation or native forest timbers. In June 2023, the Victorian government gave 6 months notice of the closure of the Victorian native forest industry on 31 December 2023. This announcement brought forward the closure of the industry by six years, would have created uncertainty about Australian supply options.

Stable forest policy is a key requirement for timber demand to be met by NSW suppliers, rather than being sourced from overseas sources.

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

The future potential of plantations and private native forest to help meet timber supply is subject to a number of key risks. Increasing risk of megafires will have negative impacts on investor sentiment and business costs, including plantation insurance costs.

NSW has 29 percent, about 290,000ha, of the national softwood estate. The Forestry Corporation of NSW manages 230,000ha of softwood in the Tumut, Bombala, Oberon Grafton regions. and 35,000ha of hardwood plantations in north east NSW. FCNSW is the dominant supplier of plantation sawlogs to NSW mills. About 52,000ha, a quarter of the estate was affected by the 2019-20 megafires.

Following the salvage of merchantable plantation logs, customers of FCNSW and private growers are facing significant reductions in log supply. In one or more cases, there are potential gaps in supply, which are expected to result in major cuts to log intake or mill closures in the next few years.

Any suggestion of a transition of the NSW native hardwood mills to plantation supply in four years, more or less, is at best ill-informed or else a public relations fabrication to support relentless campaigning to close the native forest industry. The drop in softwood supply and the full commitment of relatively small volume of hardwood sawlogs means there is no surplus volume to "transition" to.

Recent court action by the NSW EPA against a NSW private native forest owner has sent a chilling message to NSW private native forest owners considering supplying native forest timber.

This action has highlighted concerns SETA members hold about the tape measure compliance rulebook the EPA enforces. There is no need to prove any actual environmental harm has been caused in many instances. It is simply a matter of showing some activity has been undertaken less than a prescribed distance from one feature or another or retention of a specified number/basal area of trees has not been achieved.

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

There is potential for a trial program to be developed that would a melding of traditional Aboriginal management and 21st century technology to 'restore country.' FCNSW have a number of employees engaged in cultural activities, including burning. These staff could potentially engage with selected Local Aboriginal Land Councils (LALCs) to develop restoration trial on selected public and LALC land holdings.

State forests provision of environmental outcomes compared to national parks have been covered above. Over the past 30 years, the loss of jobs, businesses and government services from rural communities have been widespread across NSW. This has shown that despite promises that tourism and other government support packages, will offset the social and economic impacts of forest industry cut backs or closures, new conservation reserves, have not delivered better outcome.

Increased tourism has always been promised as the economic driver to more than replace those jobs lost from the timber industry. This was the case with the transfer of major areas of red gum forests in the Murray Valley from state forests to national parks. The transfer resulted in a reduction of sawlog quotas by 85%. Local council representatives noted among other things that:

In Mathoura, visitation levels had dropped 28% (32,000 in 2010 to 23,000 2014), the IGA supermarket, the bakery and a bed and breakfast had all closed. The pub was up for sale and the local footy team struggled to get players.

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.

If there is not radical reform of low intensity burning to mitigate high intensity megafire risk, carbon, water catchment and biodiversity values of native forests will continue to degrade. For example, over twenty years ago, UNESCO inscribed the greater Blue Mountains area on the World Heritage List for having "outstanding universal value". After the 2019-20 high intensity megafires had ripped through 79 percent of the Greater Blue Mountains World Heritage Area, the International Union for Conservation of Nature (IUCN) — the official advisor to UNESCO downgraded the site as being of "significant concern", which is the second-lowest category.

How can any responsible government agency encourage carbon and biodiversity markets, when substantial areas of forest, with global heritage listing cannot be protected from megafire disasters, let alone other less protected areas? More frequent megafires will also have negative impacts on native forest and plantation timber production capacity. Loss of human lives and property will continue to be a growing tragedy of unsustainable forest management.

[redacted]

Peter Rutherford

SETA Secretary

Appendix A Fire Thresholds (Return Times)

Vegetation formation	Minimum SFAZ Threshold	Minimum LMZ Threshold	Maximum Threshold	Notes
Rainforest	NA	NA	NA	Fire should be avoided.
Alpine complex	NA	NA	NA	Fire should be avoided.
Wet Sclerophyll forest (shrubby subformation)	25	30	60	Crown fires should be avoided in the lower end of the interval range.
Wet Sclerophyll forest (grassy subformation)	10	15	50	Crown fires should be avoided in the lower end of the interval range.
Grassy woodland	5	8	40	Minimum interval of 10 years should apply in the southern Tablelands area. Occasional intervals greater then 15 years may be desirable.
Grassland	2	3	10	Occasional intervals greater than 7 years should be included in coastal areas. There was insufficient data to give a maximum interval; available evidence indicates maximum intervals should be approximately 10 years.
Dry sclerophyll forest (shrub/grass subformation)	5	8	50	Occasional intervals greater than 25 years may be desirable.
Dry sclerophyll forest (shrub subformation)	7	10	30	Occasional intervals greater than 25 years may be desirable.
Heathlands	7	10	30	Occasional intervals greater than 20 years may be desirable.
Freshwater wetlands	6	10	35	Occasional intervals greater than 30 years may be desirable.
Forested wetlands	7	10	35	Some intervals greater than 20 years may be desirable.
Saline wetlands	NA	NA	NA	Fire should be avoided.
Semi-arid woodlands (grassy subformation)	6	9	No max	Not enough data for a maximum fire interval.
Semi-arid woodlands (shrubby subformation)	10	15	No Max	Not enough data for a maximum fire interval.
Arid shrublands (chenopod subformation	NA	NA	NA	Fire should be avoided.
Arid shrublands (acacia subformation)	10	15	No Max	Not enough data for a maximum fire interval.