

Public submission

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Dear Independent Forest Panel IFP

Thank you for the opportunity to make a submission towards the NSW Forest Industry Action Plan.

I encourage you to consider my response, which is based on my experience in reviewing forestry conditions and protocols and their application to north coast NSW Forests. I have a background in arboriculture, environmental assessment and restoration, and island conservation.

I am **seeking your intervention** and request for a moratorium on public native forestry during this review.

I have strong concerns that during this process, logging will be upscaled, of which I have witnessed in the proposed Great Koala National Park. The mechanisation and speed at which timber harvesters can log and destroy forests is alarming, thus I am seeking your intervention.

I was involved in the Comprehensive Regional Assessment CRA flora and fauna teams throughout the north east forests in 1994 which worked to inform the Regional Forest Agreements (RFA). This agreement has been rolled over to the current time, with reduced environmental protections and increased timber harvest (trees can now be harvested at 10 cm dbh (diameter at breast height), previous minimum size was 20cm dbh).

I believe in sustainable forestry.

However, over the past three decades I have witnessed the further degradation of our public forests, impact to threatened species habitats and degradation of what could have been a sustainable hardwood timber industry.

The impact to our public native forest has been strikingly more evident to me after returning from a 15 year sojourn on Lord Howe Island, where I have been involved in pest species eradication programs which have worked to reverse threatened species extinctions. When I left for Lord Howe Island, chainsaws were still used for tree felling. Mechanical harvesters are now used. Logging is now industrialised. The landscape scale, the intensity (short turn around logging cycles) and industrial nature of logging that has been endorsed under the CIFOA has essentially pizzled our public native forests under the guise of sustainability.

The CIFOA rule book, which standardises 'inadequate' environmental protections has aided the degradation of threatened species habitats, water catchment values and plunder of quality timber resources.

In the last two years I have been engaged by north east forest conservation groups and individuals to help identify and report threatened species locations to aid their protection from logging. I have visited numerous State Forests and I am ashamed and disheartened at the degradation impact endorsed by the NSW State Government.

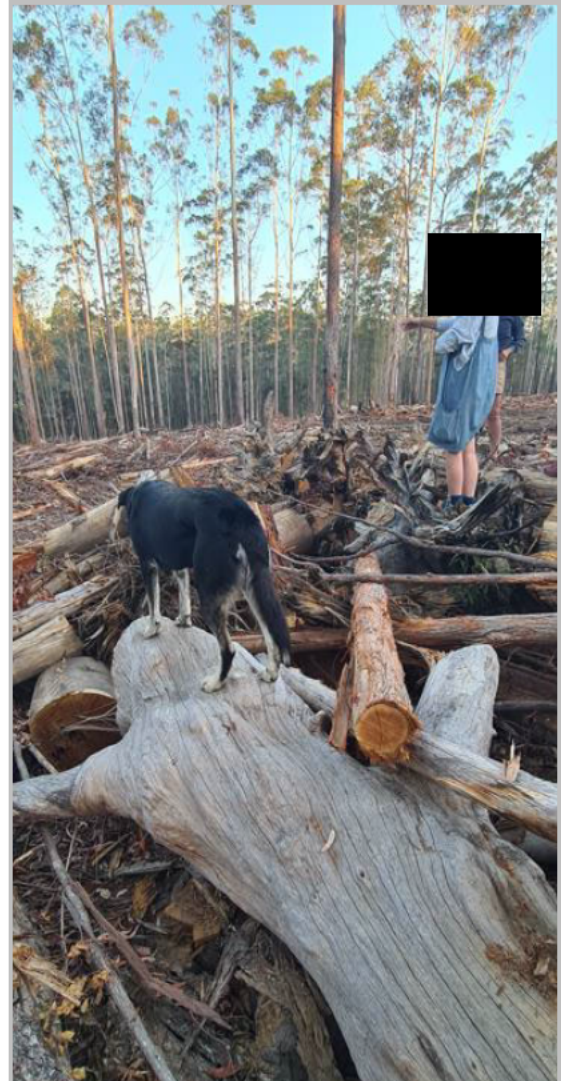
I have seen forests reduced in tree species diversity, height and structural integrity; native forests which now look like single species plantation forest (see Pic 1). Hollow bearing trees, an important ecological asset are either absent or very few on the ground. I expect the NSW Government to be leading the way in best practise environmental protection and timber management, but alas substantial areas of our forests have been logged and set back into a phase that will need 150 years regrowth to regain quality of habitat and timber.

I have provided a few examples to raise my concern regarding the logging of native forests. In summary I strongly recommend that **the logging in our public forest must cease immediately** to protect what we can, while we can. Our public asset is best served for water catchment, tourism, threatened species protection and climate impact mitigation. **Private Native Forestry**, environmental protections are increased, or landholders paid to keep their forests in the ground. **Plantation Forestry is important** however increased buffers for the protection of drainage lines, increased buffers around remnant forest, threatened species & fauna corridor links is needed. **Research and development to alternatives for fibre and construction materials such as hemp is warranted!**

Thankyou for your time and I hope you can gain some insight from my submission.



Pic 1. Tamban State Forest 2023 Forest Compartment on Ians Road. This is native forest. This forest has been reduced to that of a single aged plantation forest, a result of 10% basal retention area – essential 90% timber grab. This forest has essentially been sterilised of mature & hollow bearing trees. This transformation is occurring across our east coast forests.



Pic 2 – 3 Log dump Tamban SF. Log dumps are used as clear fell opportunities. In this pic a patch of remnant mature trees has been removed to make way for an extended log dump. Timber has also been left as waste. Standing dead trees are required to be retained for their fauna habitat values. This tree is mapped under the EPA mapper as deemed dangerous therefore it was removed'. On inspection the condition of this stag was sound. However, considering the limited extent of these important habitat features – best practise would be to provide a buffer, exclusion zone. Dangerous tree has been used opportunistically under the CIFOA to aid the removal of habitat features.

Sustainability of current and future forestry operations in NSW

The NSW Government is subsidising the degradation of our public native forests which in turn is degrading our threatened species habitats and our catchments. Figures of direct loss have been touted in various reports.

The RFA & CIFOA has accelerated the demise of what could have been a high-quality, high-end hardwood industry. Our NSW Public State Forests have been seriously mismanaged under the guise of sustainability, under the CIFOA rule book.

This is evident by merely looking at the reduced stature and volume of timber currently standing. There are forests that I had historically surveyed which have been reduced to fire prone 'stick forests'. It is literally sickening to see our public land being whittled away.

NSW Forest Corps have been subsidised to degrade our forests and threatened species habitats meanwhile promoting the invasion of weeds, namely Lantana. Their mode of operations is creating a biosecurity issue that will require massive investment to turn around. They advise on their website that they address their biosecurity duty by spraying weeds twice within a 30 yr plantation cycle & by scalping the ground. They are land degraders. It is shameful. Refer to Pic. 4 & 5 – scalping and landscape impact Tamboon SF.

Our native forests should no longer be logged for construction, woodchip, firewood or pulp. It's an opportunity lost – it needs a total re-think. And I note that the construction industry already accesses softwood & hardwood plantation timber.

I urge your panel to end native forest logging and ensure adequate compensation or alternatives to employees and contractors.

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

The NSW Government has legislative responsibility to protect both Federal and State listed species; however the CIFO rule book legislates the degradation of threatened species habitats.

The CIFOA causes harm directly & indirectly to threatened species (eg hollow dependant species such as the greater glider, yellow-bellied glider & large forest owls). The CIFOA logging practise either removes key habitat features, or impacts habitat to such an extent creating single aged, simplified forest in both structure & species diversity, impacts food resources (leaf & nectar); creating a hostile environment. Threatened species are outright harmed or die through a matter of attrition due to loss of habitat resources, stress etc.

Indicators of forest health

Whilst the protection of threatened species is our legal responsibility, we can look to other environmental indicators that help to advise of forest integrity and health. The dawn bird chorus can be used as an indicator. For example, in undertaking a visit to the eastern portion of Tamboon SF the dawn chorus was deaf, it even lacked the call of humble Kookaburra or the White-throated Tree Creeper. These are hollow dependant species and evidenced of the lack of hollows in that specific portion of forest.

If NSW FC was sustainable & working to manage cultural and threatened species values, there would be an array of hollows throughout our forests. We wouldn't be needing to write submissions to the IFP in regards to this matter.

Under the RFA, conservation reserves along with State Forests have dual responsibility in threatened species protection. However, the architect of the CIFOA and NSW Government has carefully crafted the means for NSW Forest Corporation to side step their side of the bargain

Canopy is Sacred

I have been explained to by Gumbaynggirr traditional custodians that 'canopy is sacred'. That the protection of canopy is vital for the protection of water which is also sacred. The CIFOA logging practise of removing 90% basal area ie. working on a 10% net basal retention is practically clear felling, it could be considered as desecration of country. Similarly, the logging of 30 degree slopes and the limited buffers retained on drainage lines is degrading our water catchment capacity. Water is Sacred! It is essential to Life and protection to this precious resource maximised. The proposed logging of the Kalang Headwaters is archaic, poor landuse : (

No Consultation or Inadequate Consultation

The consultation with traditional custodians by NSW Forest Corporation regarding Native Public Forest & Plantation forestry is questionable. For example, logging within Newry State Forest Range Road; the NSW FC Aboriginal Liaison officer having signed off on the harvest plan. Whilst the Local Aboriginal Land Council (LALC) may have been consulted, which helps tick a box. My concern is that several Gumbaynggirr Elders including the oldest living elder, participated in the protest and were disheartened to witness the desecration of country, 'they were not consulted'.

Considering the significance of country to our traditional owners and of the funds that are invested into roading operations pre-logging; surely a more comprehensive engagement with our indigenous people could be afforded and work to help 'care for country'.

Endangered Species more at Risk due to CIFOA

Federal listed Endangered species (e.g. Southern Greater Glider) are under State Capture!

Habitat modification and the removal of hollow bearing trees is recognised as a threat to the Southern Greater Glider (SGG) (EPBC Act – Conservation Advice). This species is currently rearing young, this being a time in which this species is more prone to stress, yet NSW FC are currently logging their habitat e.g. at key high density populations such as Bulga State Forest.

Would we condone the removing of walls or of food resources to a maternity ward? Of course not. Then for our endangered species which depend on our decisions to protect their habitat, we are essentially short cutting them and fast tracking their demise.

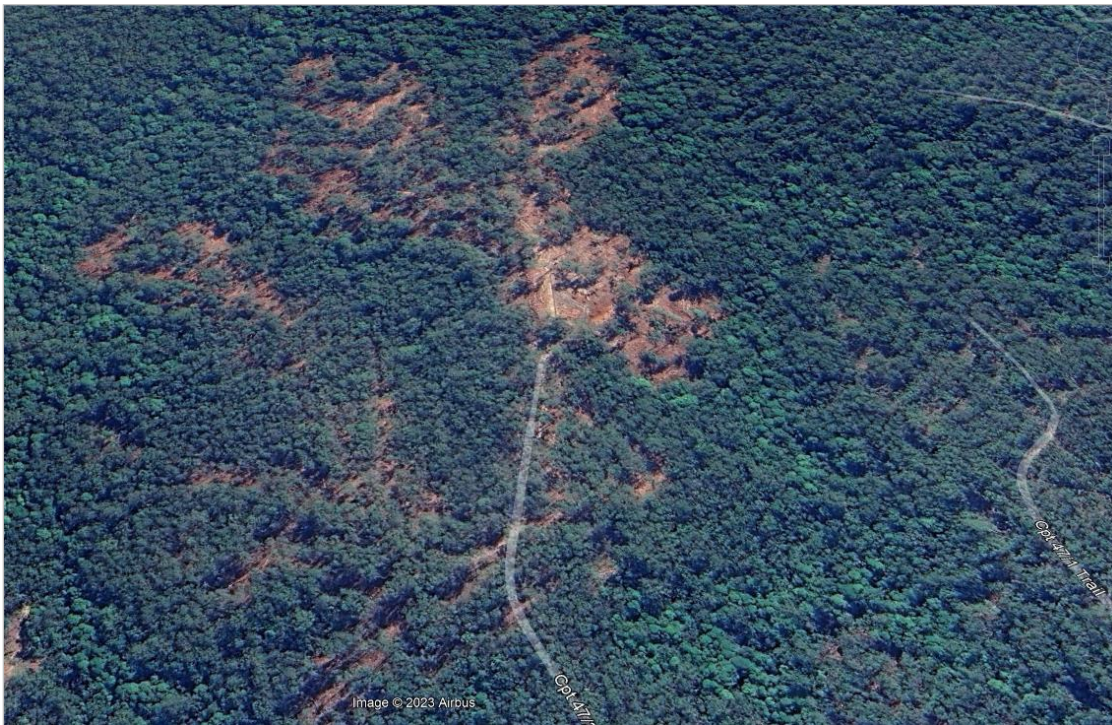
The NSW Government under the CIFOA is essentially endorsing the further endangerment and committing harm to this species. However the CIFOA has been carefully crafted and endorsed to step aside from the legal protection of these species. Timber harvest has been put ahead and not on par to threatened species protection.

Similarly the requirement to see an animal entering or leaving a den tree (see snip of protocol below) to enable the application of a 50m exclusion zone, is like finding a needle in the haystack. The SGG requires up to 15 hollow bearing trees and lives quite a sedentary existence occupying up to 3 to 4 hectares. The localised impact to this species habitat will compromise their survivorship.

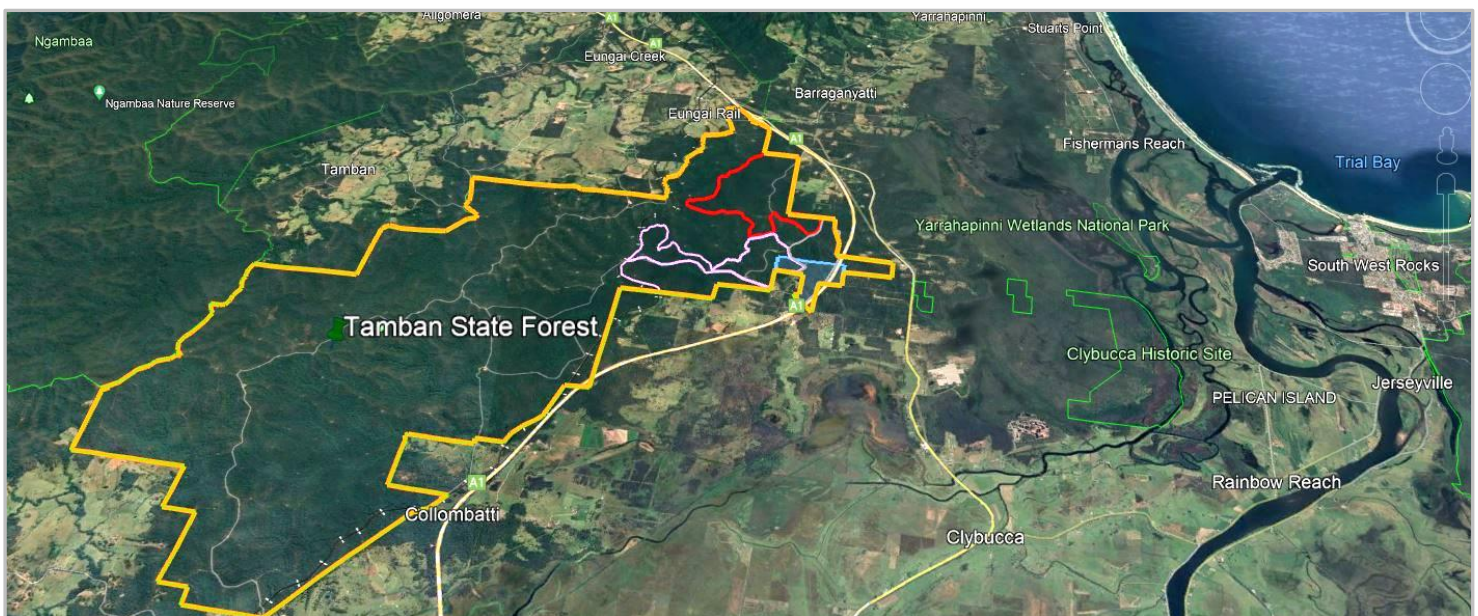
It has been demonstrated that community conservation groups find more animals and den trees than NSW FC; this is not necessarily due to incompetence, but shows the abject failure in the CIFOA protocols, which are skewed to not work in favour of protecting nocturnal hollow dependant species.

3. A den (specifically in relation to *Petaurus australis*, *Petaurus norfolcensis* and *Petauroides volans*) that includes, but is not limited to, a tree-hollow or other hole, crevice or fissure in a tree, which the **subject species** is seen entering or leaving. The dens may be used by the **animal** for roosting, sleeping, resting, breeding, raising young and communal congregations sheltering and/or the rearing of young;

Whilst the CIFOA identifies exclusion zones, such as wildlife habitat clumps, old growth, rare forest and steep slopes; the protection of species within mapped harvest zones should also be paramount.



Pic 4. Aerial view of western portion of Tamban State Forest NSW 2023. This is CIFOA endorsed 10% basal retention logging. This method of timber harvest is anti- biodiversity conservation, increases erosion and the carbon loss significant. The scalping of the ground, including the removal of key food trees for the Glossy Black Cockatoo is a HP objective to promote regeneration of merchantable timber; thereby creating hungry younger fire prone forest.



Pic 5. The landscape scale extent of native forestry across the north and south east coast is having a landscape scale impact. There is a landscape scale loss of hollow bearing trees. There is a housing crisis for our hollow dependant threatened and common species. Logging across altitudinal, latitudinal and elevation range, impacts sedentary to nomadic fauna. Harvesting does not consider flowering events of Eucalypt blossoms important for a diversity of common to threatened species.

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

If the need of timber for construction, mining etc was so great, we would not be sending low quality hardwood to burn for electricity generation or as pulp.

Our forests have been managed in a wasteful manner.

Our public asset been used and degraded, it has been used as a political prop to keep the unions happy and politicians in power.

We hear of job cuts in various sectors to no whim of peoples welfare. The talk of downsizing the timber industry is met with rage and impact to the man on the land.

NSW Government I encourage you to be bold, be creative, to incentivise the retention of forests in the ground and to invest in research and development to find alternative product and to bring an end to native forest logging.

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

Private Native Forestry (PNF) is not a valid alternative to public forestry, unless environmental and threatened species conditions are improved/ ramped up to ensure adequate protection. Increase buffers to all stream orders, increase buffers to habitat trees, retention of hollow bearing & their recruit trees.

PNF environmental assessment needs to be independent, audited, work within the Local Council sphere, Koala Habitat etc.

Ideally landholders should be paid to keep forests in the ground.

Like Public Native Forestry I have witnessed numerous PNF operations which have depleted the extent of mature and hollow-bearing trees; notably in the Clarence Valley.

Current Native hardwood plantation codes – needs enhanced environmental protocols. There are areas of native forest that have been modified by forestry and clear felled under the guise of ‘plantation’ owing to supposed ‘regeneration failure’, with supplementary planting or seeding undertaken e.g .Wild Cattle Creek. Plantation forest serves a role in the protection of waterways and habitat. If this is to continue increased buffers on drainage lines, buffers on remnant forest and retention of trees for fauna corridors needs to be applied.

The current landscape scale clear-felling and burning of plantation forest – is essentially ‘land clearing and is causing significant carbon output’. Large scale clear felling of native species in proximity to native forests needs to be re-worked its an archaic practise. Poly-culture will serve us and the environment better than monocultures, exotic pine forests aside.

I encourage the NSW Government to expand Plantation Forestry onto cleared land and to invest in alternative products for fibre and construction such as hemp.

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

Our state forests need a massive investment into their restoration.

I encourage 'Caring for Country'.

I support traditional custodians to get back onto country!

Our state forests provide a wealth of opportunity in forest conservation, tourism, catchment protection and education.

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

Keep the carbon in the ground!

Let the forests mature, sustain our catchments and improve our resilience to climate change.

Carbon & biodiversity investments is the way ahead.

End native forest logging now.

Let's be winners and climate resilient.

Thank you for your time.

Regards

Sue Bower

