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

13 October 2024

Independent Forestry Panel: Peter Duncan AM (Chair), Professor Mary O’Kane AC and the Hon. Mick Veitch. <https://www.ipcn.nsw.gov.au/cases/2024/08/independent-forestry-panel>.

This submission is written on the Traditional Lands of the Gumbaynggirr people

The Bellingen Environment Centre (BEC) is an incorporated volunteer organisation established in 1990 with over 120 members who reside in or near Bellingen township in the Mid North Coast region. BEC members provide advice, assistance, planning and monitoring for environmental enhancement projects in our region and take a keen interest in the state of our natural environment and natural resource management. We were one of the original local groups behind the development of the proposal for The Great Koala national Park (GKNP) over ten years ago. We take this opportunity to state our concerns regarding the delays in establishing the GKNP and strongly object to the ongoing and expanded intensive forest harvesting that is still occurring in the area whilst planning for the park drags on.

The BEC believes current forestry operations are making a significant contribution to escalating rates of habitat and species loss in NSW.

A local colleague of the BEC, Mr David Wood has, in his submission included an excellent range of observations in the Coffs harbour region of local forestry practices that were not considered to contribute to maintaining of local biodiversity, including:

- depletion of timber resources over time ,
- destruction of original species mix and structure,
- tolerating regeneration failures ,
- selective removal of ‘undesirable’ native species,
- inadequate protection of examples of endangered species,
- inadequate or inappropriate monitoring of threatened species,
- broadscale removal of habitat trees,
- excessive destruction of residual forest components during harvesting operations,
- promotion of commercially favourable species, and
- promotion of invasive species by harvesting operations.

Private native forest logging, in our region at least, is very poorly supervised and produces additional impacts including:

- destruction of habitat for threatened species because of a lack of requirements for prelogging assessment,
- extensive logging of old growth and advanced growth forests. Log trucks removing logs from private property logging in the region have a high proportion of large logs, and
- increased erosion from logging of excessively steep lands and lack of regulatory oversight.

Native forestry practices cause these impacts broadly across the forested landscape and the only viable option for a sustainable forestry industry is one based solely on softwood plantations and

alternative products . All forms of forestry activities should stop in public native forests and rapidly transition out of private native forests.

The submission by Lindenmayer to this Inquiry provides a strong and detailed evidence of the unstainability of native forest logging siting at least 15 references and is strongly supported by the BEC.

Forestry Corporation's estimates of sustained yields have been proven time and time again to be gross over-estimates, since 2010 yields from state forests have declined by 40% from 1.3 million tonnes down to 0.8 million tonnes in 2023, and are currently only 61% of claimed sustained yields, with the massive loss of resources in the 2019/20 fires yet to be factored in.

Native forest logging on the North Coast is a tree mining operation, that has only been able to be maintained by removing protections for most mature trees and increasing logging intensity in the 2018 revision of the Coastal IFOA's.

In summary, logging of native forests is not sustainable as it reduces biomass and carbon storage, removes mature trees and their abundance of nectar and browse essential for many species, depletes oldgrowth trees and the hollows that 174 of NSW's species depend upon for dens and nests, increases fire threat and intensity, reduces stream flows, promotes weeds and dieback, and increases erosion and stream pollution.

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

The decline of a multitude of forest dependant species, including threatened species such as Koala, Greater Glider and Yellow-bellied Glider, can be attributed to past and current forestry practices. Even if future practices are improved they inevitably involve the reduction of the growth stage and tree development removing the features of older forests that are so important for many species.

Native forests have significant environmental values, values for threatened species and substantial cultural heritage values for First Nations peoples. Many of these values can be degraded by logging operations. One of the straight-forward ways to maintain these values and not degrade them is by not logging native forests.

Forests generate rainfall and cool the land, clean the air, provide homes for a plethora of threatened species, are important for recreation and improved health, filter and regulate runoff to streams, and remove carbon dioxide from the air and store it in their wood and soils. If we want to save NSW's 269 nationally listed threatened forest species, including the endangered Koala and Greater Glider, it is essential that we stop logging their homes.

In the 1990's the NSW and Federal Government jointly participated in implementing the 1992 National Forest Policy through Regional Forest Assessments (RFA's) for forest regions including the Upper and Lower North Coast forest regions in north-east NSW.

The outcomes were summarised by Flint C et al, 2004*

‘the process began in north-east NSW in 1995 and resulted in the direct reservation of 737,602 hectares of forest as National Parks estate in north east NSW, the exclusion of logging from all mapped oldgrowth forest (greater than 25 hectares) and rainforest in remaining State Forests, and the provision of 20 year, binding wood supply agreements to the timber industry in the region at 50% of 1995 levels.’

Reservation targets set during the RFA process were used to provide an empirical assessment of reserve adequacy for fauna in the region. Flint et al further reported that:

- ‘only 29% of priority fauna populations have fully achieved reservation targets in north-east NSW, and
- across all populations, mean target achievement is only 49%. and

- the scale of the reserve outcome did not satisfy the national reserve criteria for forests and is considered to be inadequate to ensure the survival of priority species in north-east NSW.' It has since been widely recognised that the Koala, then rated as commonly occurring species, was not dealt with well by the RFA process. With techniques available at the time it was difficult to record Koalas in systematic surveys and most of the records were from urban and near urban areas.

A number of attempts to subsequently review and rectify the poor outcome for the Koala in the RFA were unsuccessful.

By 2010 reports from local landholders and residents of the decline in local Koalas became too much to ignore. The Bellingen Environment centre, in collaboration with The Clarence Environment Centre, The Nambucca Valley Conservation Council, the North Coast Environment Council and the local branch of the National Parks Association. Our groups engaged outstanding locally based fauna ecologist David Scotts to undertake an initial assessment of Koala populations between the Macleay and Clarence Rivers.

Scotts Identified three Koala metapopulations containing 21 sub populations. The central and southern metapopulations , the Guy-Fawkes- Coffs Harbour and Bellinger- Nambucca and Macleay, quickly became apparent as targets for a large scale conservation network despite ten of the fourteen subpopulations as being rated by Scotts as in decline.

During the assessment period the Koala's status was uplifted from common to threatened and by 2015 the NSW Labor party came onboard to support what was then the proposed Great Koala National Park.

The proposed park was savaged by the 2019-20 fires, which led to the koalas status being upgraded to endangered and probably set 3 more subpopulations (now 13 of 14) in decline. Logging continued and after the Labor Government was elected in March 2023 doubled in extent and continues to this day- some progress on the GKNP is promised by the end of the year.

Its early days but a number of lessons can be learnt from the GKNP exercise to date to assist in developing a revised Forest Industry Action Plan including:

1. Major forest reform must be accompanied by interim forest protection provisions as icon forests will otherwise be targeted.
2. Data collection and decision making processes should be watertight otherwise negotiations will be strung out.
3. Planning for restructure and compensation should start on day 1(if not earlier).
4. Getting a handle on the jobs and the timber resources is difficult and always has been.
5. Native forest plantations can be critical habitat and require a sophisticated approach.
6. Saving Koalas doesn't necessarily mean saving gliders
7. Good habitat which is currently low on Koalas may be important for long term recovery.
8. don't let the planning become a squabble over landuse , there is serious planning to do to implement the Government's commitment to a flagship Great Koala National Park.
9. Species recovery and reserve management costs barely register with Treasury.
- 10 Big initiatives require big support from Government- well beyond duties as normal for public servants

*Carmel Flint¹, Dailan Pugh² and Daniel Beaver 2004 The good, the bad and the ugly: science, process and politics in forestry reform and the implications for conservation of forest fauna in north-east New South Wales. In Conservation of Australia's Forest Fauna (second edition) 2004, edited by Daniel Lunney. Royal Zoological Society of New South Wales, Australia

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

The vast majority of wood products can be sourced from softwood plantations, or substituted by other products, including for uses where hardwoods are preferred. Continued access to relatively cheap hardwood products is no justification for the continued logging of native forests, especially as alternatives products are already available for challenging applications such as wharfing, power poles, flooring and decking. The low level of demand for boutique purposes such as fixtures, furniture and veneers can be met through recycling and appropriately stocked plantations.

The native forest logging industry has long been overwhelmingly dominated by high volume, low value products such as woodchips, paper pulp, and feedstock for packaging. Conversely, the vast majority of sawn timber (90%) comes from plantations

As demands for timber can largely be met from plantations and have been increasingly so for many years highlights the fact that a transition to a plantation-only industry can meet timber requirements.

Native hardwoods comprised 2.4 million (9%) of Australia's log production of 25 million cubic metres in 2023, with half this exported as woodchips. Saw and veneer logs comprised just 8% of the 8.5 million cubic metres of logs obtained from hardwood plantations, with 87% exported as woodchips.

There is no longer any need to log public native forests to build houses. With a change in emphasis we can satisfy our hardwood needs with sawn timber and composite timber products from existing plantations.

The market and demand for native forests is declining rapidly, the recent case of Essential Energy moving away from power poles harvested from native forests is just one example.

Many uses provided by hardwood timber are being replaced by other materials and this process will be accelerated if subsidies for growing and harvesting native timbers are withdrawn.

Hemp is a particularly quick growing alternative for a range of hardwood timber products. The development of a hemp industry for a range of products requires government support to assist with the necessary industry infrastructure.

Paper products can and are produced from a range of products as alternatives to being produced from native timber.

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

In North East NSW Significant areas of native forest plantations have been included within at least sixteen conservation reserves, primarily as a result of past major land use negotiations. Preferably it would be desirable to exclude those plantations but factors such as boundary area ratios, access issues, habitat value are obviously important conservation considerations for existing and new plantations.

This is particularly important in the proposed Great Koala National Park (GKNP) where this issue is highlighted because:

- Commencing in the 1960's The Australian Pulp and Paper Mill company commenced purchasing a large number of dairy farms on coastal river floodplains which had been established from original forests of subtropical rainforest or with components of subtropical rainforest, and planted eucalypt (predominantly flooded gum- a secondary koala food tree) plantations on these lands, then left and sold the plantations which were purchased FC NSW optimistically as a sawlog resource.

- Joining in the rush to create flooded gum plantations up until about the 1970's The NSW FC converted non regenerating native flooded gum forest areas on state forest (commonly with

subtropical rainforest elements- often advanced) to plantations by clearing, stacking, burning and planting.

In both these circumstances the plantations have commonly developed as Koala habitat with regenerating endangered lowland rainforest community understories. The relatively extensive plantations were predominantly located in coastal areas, often amongst coastal residential or rural residential development, where there are a considerable range of other threats to Koalas. A number of local resident groups have expressed strong objection to the continued existence of these plantations as a fire hazard and objecting to their clearfelling and replanting with eucalypts. The residents generally support the inclusion of the plantation areas in the proposed GKNP and ongoing management to improve the habitat value and reduce the fire hazard they pose.

To ensure the location of plantations is well planned It is recommended your Panel initiate a scientifically and practical landuse classification and management approach to the assessment of existing native forest plantations and planning for future plantations. If not managed sensibly this issue can become difficult and wrongly politicised as being anti-plantation. Proper landuse planning is very important.

Hardwood and softwood plantations already provide 91% of Australia's log production. The proportion of saw and veneer logs obtained from hardwood plantations needs to be increased, rather than being exported as woodchips. Without competition from subsidised public forests there will be an increased incentive for selective logging of speciality purpose hardwoods from private forests.

Investment in hardwood plantation on already cleared land in suitable and appropriate would supply timber products into the future as:

- shifting to higher-value plantations can better meet timber needs,
- a higher proportion of harvested logs from plantations should be prioritised as saw and veneer logs, rather than exporting them as wood chips
- subsidising the logging of public native forests by the Forestry Corporation is non-competitive and distorts the market away from the more profitable softwood plantation industry, and
- High-end and luxury native hardwood products should only be selectively harvested on private land and under strict conditions.

Plantations do need to be well managed, including for reducing fire risks. However, there are design principles, management strategies and new technologies that can be employed to reduce the risks of plantation timber stock losses although these strategies are not always implemented. An increase focus on plantation forestry must not involve conversion of even limited areas of native forest to plantations; a practice that is currently occurring in some parts of NSW and it an inappropriate form of land management.

Logging should be transitioned out of native forests, regardless of tenure. The transition to complete reliance on softwood and hardwood plantations for the supply of wood products in NSW.

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

The highest potential public purposes of public native forests are biodiversity conservation, the provision of ecosystem services such as clean water and air, and maximising the capacity of nature systems to capture and store atmospheric carbon. The major and repeated breaches of

environment regulations by NSW Forestry Corporation model demonstrates that it provides a totally unacceptable model for administering these public assets.

All State Forests that contain native forests should be gazetted as National Park, Nature Reserve, State Conservation Area or Regional Park under the National Parks and Wildlife Act. The BEC supports these reserves being formally declared for Aboriginal joint management under the relevant provisions of the National Parks and Wildlife Act.

There has been advocacy from the native forest logging industry and lobby groups such as Forestry Australia that native forests should be subject to Active Management that includes thinning and other forms logging operations. It is claimed that these operations will make forests more resilient to wildfires. As Lindemayer's submission attests there is no empirical evidence for this proposition. Conversely, there is evidence that there is no effect of thinning on fire severity, or in some cases, forests that are thinned subsequently burn at higher severity as illustrated in outcomes documented following wildfires in Victoria in 2009 and following the 2019-2020 Black Summer wildfires.

Another form of logging that is being promoted by forest industry advocates is so-called Forest Gardening- which is a new name given to conventional logging of First Nations Country. Forest Gardening entails removing significant amounts of the stand basal area of a forest using conventional logging machinery. Formal strategies for Forest Gardening encompass western industrial forestry practices. However, there is no evidence that such operations heal Country; rather, like conventional logging, forests and forest biodiversity are likely to be significantly negatively impacted by Forest Gardening.

One of the straight-forward ways to maintain environmental values and cultural values of native forests and not degrade them is by not logging them. One of the reasons that Forest Gardening has been promoted by forest industry advocates is that populist literature claims that forests were open and park-like at the time of British invasion. Such conditions were claimed to have been created by widespread and frequent burning of forests as well as farming by Indigenous communities. A detailed examination of historical, cultural and ecological evidence for tall, wet forests has uncovered no evidence of widespread farming or extensive and recurrent (repeated) fire.

There is similarly no evidence that tall, wet forests were open and park-like at the time of British invasion. There is therefore no current scientific basis to apply Forest Gardening or widespread thinning as part of Active Management in these (and indeed many other) native forest ecosystems (for a comprehensive list of references on this topic refer to the submission to this inquiry by Lindenmayer).

There are 2 million hectares of State Forests in NSW that provide water for numerous town reservoirs, have the potential to contribute to increased tourism, and take-up and store carbon. All these real economic benefits will improve if logging is stopped. In 2023 Forestry Corporation lost \$15 million on their hardwood operations, that's a cost of \$1,281 for each hectare logged. This is despite being paid \$31 million for their community service obligations that year, and obtaining tens of millions in regular equity injections. We should not be paying to degrade forests and log the homes of threatened species. Public forests are of greater economic benefit for water yields, tourism and carbon storage than they are for logging. It is in the best interest of taxpayers to stop logging of public native forests.

In summary;

- healthy native forests provide essential water resources,
- protecting and restoring State Forests will increase the economic value through tourism, carbon storage, job creation and recreational opportunities,

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- the Forestry Corporation is currently financially unsustainable, relying on government support and yielding less timber compared to managed plantations, and
 - diverse forest management, particularly Aboriginal models, can enhance the cultural and social value of forests.

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

The scientific consensus is that ecologically intact natural systems have a critical role to play in sequestering and storing atmospheric carbon, the primary driver of climate change. An intact, well-protected NSW forest estate has a major role to play in addressing these threats to our collective future.

While recognising the importance of carbon capture and storage, the lack of integrity in current carbon and biodiversity trading schemes inspires little confidence that such schemes should be expanded to include public native forests. Moreover, it would be entirely self-defeating if credits generated through the protection of public native forests were used to enable excess emissions by unrelated industries.

Intact native forests store significantly more carbon than logged and regenerated native forests. Native forest logging generates large amounts of emissions. Indeed, a key way to reach Australia's 2030 GHG reduction targets will be to stop native forest logging. The biodiversity benefits of intact native forests have been well documented. The best way to maintain the biodiversity values of native forests is to stop logging them, including in NSW.

Carbon does not have to be traded to show benefits and this will avoid the gaming that has characterized substantial parts of the carbon trading industry in Australia. Native forest logging in NSW releases 3.6 million tonnes of carbon (CO₂e) per year, which is equivalent to the annual emissions of 840,000 cars. The volume of carbon stored in logged forests has been more than halved. Stopping logging will enable forests to regain their lost carbon and make a significant contribution to meeting our climate targets. As shown by the 2019/20 wildfires, increasing droughts and fires due to climate heating are already having a significant impact on trees, forest species and rainforests. It is essential that logging stop to allow forests to reduce the impacts of climate heating by removing CO₂ from the atmosphere, and recover their integrity to better withstand future

In summary;

- logging in native forests releases large amounts of carbon, contributing to climate change,
- stopping logging allows forests to recover, helping them store more carbon and support climate goals,
- healthy forests are essential for reducing the impacts of climate change like wildfires and drought,
- by stopping logging, forests can play a large role in mitigating climate risks and supporting opportunities in carbon markets,