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

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Living in Northern NSW, and an avid lover of forests, I have personally visited a large number of forests in both the Far North Coast and Mid North Coast regions over the past 25 years, and am absolutely appalled by the unsustainable forest mismanagement I have witnessed. This has directly contributed to the catastrophic decline in the ecological and commercial sustainability of these forests - a fact I have observed myself through regular resurvey of forests, but one that has also been pointed out to me by long term forestry contractors I have met in my visits. In one notable instance, a logger who had been in the industry over 30 years approached a number of citizen scientists in Doubleduke State Forest to detail the decline in size and value of the trees in that specific forest over his career - noting in shame "now its just sticks." Tragically, an unlogged remnant of this forest, one that had been protected under the previous Regional Forest Agreement and had therefore escaped this progressive deterioration of core values over time, was logged in 2023 after a series of failures to undertake the required surveys nor identification of giant trees, and exploitation of environmental protection loopholes which resulted in Forestry Corporation ignoring their own protocols and state government post-fire stipulations.

Examples of very poor practice by Forestry Corporation NSW include only conducting surveys for nocturnal species during the day (for example the Greater Glider), failing to undertake surveys after the 2019-20 bushfires prior to logging critical refugia, logging forests with known records of endangered species creating localised extinction, failing to map giant trees, felling stag trees despite the obvious presence of a wide range of habitat hollows ranging from small to large, failing to find any evidence of Threatened or Endangered species in forests under imminent threat of logging despite citizen scientists finding extensive populations (because we were actually looking), and the frequent "accidental logging" of giant and habitat trees as can be evidenced by the volume of Forestry Corporation NSW's own records of 'accidentally logged trees'.

Of particular concern is the detrimental impact of current forest practices on threatened species. The Greater Glider is now rare or absent from large parts of our public forest estate and is in massive population decline despite having been common only a few decades ago. There is a substantial, constantly increasing and now undeniable scientific evidence base that native forest logging is a key driver of the cataclysmic decline of this iconic species, as the Greater Glider needs multiple mature trees with suitable hollows as well as feed trees to be able to maintain population viability. Current NSW logging practices do not accommodate the core needs of this species, and therefore the only sustainable solution, to ensure the survival of this important endangered marsupial, is to completely prevent logging in any forests with confirmed populations. Current forestry practices have demonstrated over and over again that anything less is a death sentence for those local populations, so much so that it is pushing this species to the brink of its very survival.

Koalas are suffering similar population decline in our public native forest estate under the very same threatening processes, once again perpetuated by the same Forestry Corporation that is charged with 'managing' these values. Under current its current projectory the koala is on track to become extinct in Northern NSW by 2050 - and Forestry Corporation NSW continue to log even in

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documented core koala habitat areas such as the committed Great Koala National Park. Shockingly, logging activity in the highest value koala habitat areas of public forests within the proposed park boundaries has actually intensified since this government announcement,

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This extremely unethical and unsustainable practice is irrefutable proof that the Industry, which has had decades of industry knowledge and scientific evidence about what is required to actually sustainably manage our public forest estate for its multiple values, is pathologically incapable of doing so. Therefore the only sustainable future for our public forests is to cease logging and permanently remove Forestry Corporation NSW (and all its key industry power-brokers) from management oversight.

Native forest logging is also not economically sustainable, with government subsidies mounting to tens of millions of dollars over the past few years, even while the overall volume of timber in these forests continues to steadily decline and the detrimental impact on Australia's carbon emissions is well documented.

I therefore support an immediate end to native forest logging as the only way to ensure ongoing sustainability of our forests for their multiple values.

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

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In addition to my extensive personal experience witnessing logging in NSW native forests accompany a marked and ongoing decline in their ecological values over the past 25 years, there is now a substantial and growing body of scientific evidence that supports this observation. After decades of noting that wildfires impact logged forests disproportionately more than intact old forests (despite the logging industries basely claims to the opposite) there are now well documented studies that demonstrate that logging increases fire severity - and that a logged forest burning under moderate conditions burns more intensively than than an intact forest even under severe fire conditions. Disturbance to intact forests, including a wide range of activities associated with logging such as roading, clearing for log dumps, and dragging fallen trees through the forest floor, increases disturbance which promotes the growth of flammable weeds such as lantana which damage the ecological values of the forest in a wide range of ways including promoting the likelihood and intensity of fires. This change in fire regime further exacerbates the decline in other environmental values of these forests through logging disturbance, for example the weed invasions also promoting the spread of bellbirds and hence bellbird dieback, and limiting the suitability of the forest floor for native fauna movement and supressing the growth of native flora including endangered forest floor shrubs, orchids and other flowering species.

As detailed in point 1 of my submission, as to how forestry operations in NSW are not sustainable for key threatened species, there is strong evidence that koalas (and their most significant habitats) are actually being actively targeted by Forestry Corporation NSW right now. Within the proposed Great Koala National Park areas currently being assessed in the Mid North Coast, Forestry Corporation

NSW has either already logged (since the announcement) or has scheduled to log 18,800 hectares of core koala habitat. This can readily be calculated to be disproportionately higher per hectare than the entire rest of NSW forests - again a chilling reminder of what can happen when an industry becomes so out of touch with its mandate to manage forests for multiple values that it doesn't even try to hide its destructive single-focussed intention to extract timber at any cost - even the likely extinction of NSW's most iconic native species. It must never be forgotten that the proposed boundaries of the Great Koala National Park were based on calculations for a minimum viable habitat for koalas - which does not account for the potential loss of almost 19,000 hectares

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of it, and accompanying further degradation of the remainder through edge effects such as increasing fire vulnerability, weed and pest invasion, soil erosion and transport into otherwise pristine forest water catchments, and other disturbances due to the access roads. Similarly, it is documented that more than 11,000 hectares of Greater Glider habitat is also currently being logged or is scheduled for logging in the very near future. Community surveys have found hundreds of Greater Gliders in these forest areas currently being logged or about to be, with a shocking example being the logging of Bulga State Forest which is happening right now despite a very high number of these species being documented by citizen scientists with irrefutable proof they are there - and currently extra vulnerable due to having young in their pouches and therefore extra dependent on their hollows.

In terms of the cultural values of forests, I stand in solidarity with First Nations communities speaking up against the destruction of the cultural values of forests, including Gumaynggirr people who have protested at Nambucca and Newry State Forests, amongst others. I support their documented accounts of the cultural values of those forests, and the impact that the disturbance of logging has to those values, including the impact on totemic species and their ability to connect with these species in their landscape context.

I am also concerned about the detrimental impact of Indigenous Land Use Agreements (ILUA's) where they have prevented First Nations communities from being able to openly publicly condemn logging operations, as has been the direct experience of some communities in Northern NSW. All ILUAs should be immediately reviewed to ensure that there are no prohibitions on the ability of any First Nations parties with a cultural interest in an area to be able to publicly discuss the impact of any forest management activity on those cultural values.

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

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Already in Australia it is estimated that approximately 90% of our timber needs are now being met by plantations that already exist. As such, the transition away from a reliance on native forest logging to effectively meet NSW construction and other timber requirements is already nearly complete. There would therefore be negligible impact on these customer industries if all native forest logging were to cease immediately - particularly if we banned archaic practices such as exporting unprocessed timber and existing plantation management practices were improved. In fact, it is unconscionable that such an insignificant portion of our timber needs is being used as an excuse for such widescale forest degradation, habitat deterioration and decline in the population of threatened species.

The housing industry in particular has very effectively pivoted away from use of native forest hardwoods in housing building products, with plantation timber and composite timber products being far preferable in cost and utility.

Shockingly, a lot of the timber 'products' from current NSW logging operations are very low value, such as woodchips (astonishingly still being exported), garden stakes and packaging. These are therefore currently the end beneficiaries of the extensive state government subsidies that prop up the native forestry logging industry in NSW, and can easily be replaced without destroying native forests and at a significant saving to the NSW public coffers.

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

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As noted above, existing plantation timber already meets all but approximately 10% of NSW's timber needs, and is firmly the future of our domestic market.

Private Native Forestry, on the other hand, has minimal positive contribution to this demand, and poses considerable risk of exacerbating environmental damage and threatened species decline

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due to the limited capacity for effective government oversight of this component of the industry. Look at the NSW Government's current inability to reign in the destructive elements within its own management arrangements of our public forest estate (see points 1-3 above), and multiply the potential damage on private forest estate by orders of magnitude.

It has been my direct experience, in making substantiated complaints to The Environmental Protection Agency (EPA) that they are very slow to act, rarely properly investigate breaches to the Forest Management Code of Practice, and even more rarely issue more than a slap on the wrist for even the most blatant flouting of the rules. As an example, not one of the hundreds of 'accidentally felled' giant trees in Doubleduke State Forest in 2023 received any EPA fine, nor did the fact it was proven that they were never properly surveyed to begin with, nor had they undertaken the required post-fire refugia surveys. The list goes on. Therefore all native forests should be protected from logging for timber supply.

I support an immediate move to 100% of our timber supply needs being met by plantations.

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**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**

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NSW public forests hold a wide range of environmental, economic and social values, all of which are improved when they are protected from logging. NSW forestry logging is currently substantially subsidised, and still runs at an economic loss which tax-payers are required to pick up. At the same time, logging comes at the expense of the other wide range of values of these native forests, of which the most critical ones for our times are ecological services including carbon capture and storage, and habitat for threatened and endangered species on the brink of survival such as Koalas and Greater Gliders.

We are currently not able to meet our national carbon emissions targets, even as moderate as they currently are, without protecting our public forest estate from logging.

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**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**

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Australia cannot meet our current carbon emission targets without ending the logging of native forests - and it is absolutely essential to reduce the impact of catastrophic climate change. Logging of native forests is responsible for the release of large volumes of carbon into the atmosphere, and ending their logging will also provide for an increase in the capture of more carbon as these forests recover.

Intact native forests, being those that are protected from logging, also act as refugia for flora and fauna including threatened and endangered wildlife and plants, and reduce the threat and severity of bushfires. Therefore largely undisturbed native forests provide huge opportunities to mitigate and adapt to a wide range of risks associated with climate change including reducing the impacts of drought and fires.

However, an end to logging of native forests should not come with carbon offsets which allow for the continuation and/or expansion of fossil fuel projects, and under no circumstances should forest logging be allowed to continue while carbon markets are being established.

Native forests should be immediately protected from logging for their biodiversity values and functions, including carbon capture and storage.