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

For decades members of the Australian Forests and Climate Alliance have been documenting and reporting the nature and scale of environmental damage caused to native forests by the NSW state forest department, now known as Forests Corporation NSW.

Due to time constraints we provide the panel with just some of the evidence of what has led to the ecological and economic collapse of what were formerly some of the most biodiverse and carbon dense forests of this continent.

For a thorough less hasty treatment on many of the issues FIAP wants addressed for this present exercise, please see our comprehensive advice to multiple politicians including the Prime Minister in July 2024 regarding the Prime Minister's proposed review of the 1992 National Forest Policy, because All the issues in that document are pertinent to the current treatment of and the potential future of forests in NSW.

Note please, we deal with the sustainability of current operations and the environmental values of forests and threatened species together, as these are inextricably linked. We won't address cultural values and in particular in relation to indigenous heritage which we consider best addressed by indigenous people.

Setting the scene: How NSW logging has been conducted since at least 2006. We are able to offer the panel evidence of all claims in this submission including industry witness interviews and images but we can include here only two available clips, one being from an ABC broadcast. Our other evidence cannot be linked owing to time constraints to obtain specific releases for use of those other items for this specific purpose. We have had to describe their content. In 2009 a distraught timber worker described logging in the native forests of the Mid North Coast as Murder. He felt compelled to speak as he witnessed the industry he had taken pride in being

destroyed beyond recognition by brutal disregard for both forest ecosystems and the valuable wood resource. He repeated his description of ForestsCorp NSW logging as 'Murder' to Background Briefing, toning it down somewhat for the official media but the message was the same.

This man had lots to lose speaking out, job, friends, reputation in a NSW regional town one of the primary centres of NSW native forest logging but he had the courage to say what needed to be said to protect the timber resource.

Native forest harvest plans actually read: Maximise Soil Disturbance. Remove shade tolerant trees. These include Tallowwood, preferred food of Koalas and Allocasuarina torulosa, primary food tree of the endangered Glossy Black Cockatoo. FCNSW was striving to create a monoculture, i.e. a vast sea of Blackbutt

the intended outcome

of heavy single tree selection logging (i.e. removal of all bar Blackbutt seed trees after almost clear felling, was to 'restore' a Blackbutt dominated forest landscape.

Is it any wonder that scientists, citizens, conservationists, people working within the industry all agree that we are logging our forests to extinction?

Maximising soil disturbance per FCNSW directive in harvest plan. This occurs in multiple forests as a matter of routine. Soil structure, microorganisms, downstream aquatic life, not to mention regional water supplies are ravaged by is still sickeningly being described as 'sustainable' logging. NSW native forest logging is not sustainable.

The State of NSW Forests Now

Intensive, inappropriate experiments in clear felling, deliberate species manipulation, and routine flouting of already inadequate harvesting regulations has rendered NSW native forests biologically unstable and dangerously flammable. Depletion of species numbers and populations, i.e. depauperation of forest complexity renders forests vulnerable to ecological collapse through disruption of species' interactions. The basis of species' physical sustenance and reproduction is affected by removal of habitat, food sources and shelter. Without the complex interactions that allow interdependent forest species to sustain their feeding, sheltering and reproductive cycles forests degrade and will, with the increasing stresses of climate change, eventually die. All the species within native forests are vital, interconnected and indispensable to long term survival. The forests' physical structure is an essential element in this ecological process. It is massively disrupted by the heavy machinery of industrial logging and there is no time for recovery as the frequency of harvest rotations has increased owing to forest resource depletion and overcommitted supply agreements. Driven by a determination to stay in business and supported by powerful industry lobbyists and a union that enjoys influence at the highest levels of government, the state forest department will neither admit nor rectify the damage that has been done in native forests. Only those not profiting from the industry, scientists outside the system, conservationists and members of the public who bother to look beyond the thin veneer of trees left along the roadsides see the impact of the heavy machinery of industrial logging on forest understorey, floors (soil systems) and former protective canopies. Edge effects and canopy destruction exacerbate vulnerability to invasive species and climate change induced drought and fire impacts. The cumulative damage is now so intense that any attempt to recover some of the biodiversity and carbon storage and capacity of NSW native forests will necessitate that native forest logging ends , as swiftly as possible, i.e. immediately and an active programme of restoration is embarked upon , as fast as possible.

In a few decades governments of NSW governments have allowed centuries of damage. Just one factor, the requisite ancient hollow bearing trees for multiple forest lifeforms are in critically short supply, and will take a minimum of 120-150 years to regrow to support endangered species. This is just one damage factor of which there are multiple, ranging from depauperation of species across all strata of forest structure to damage to soils, compaction, their sterilisation by destruction of colonies of micro-oranisms, not to mention the reduction of carbon stores across all elements of forest cover and subterranean systems.

'Psuedo' plantations and conversion of NSW native forests by stealth

Before discussing any future of native versus plantation forests definition is needed. Not only have NSW forests lost critical biota and structural integrity; they have, in many cases, been deliberately modified into simplified stands both in terms of species composition and stand structure. This has occurred at the behest of industry the means being provided by an industry compliant forest department at the dictate of successive NSW governments valuing commercial supply contracts at the expense of sustainable forest logging practice. The deliberate conversion of swathes of native forests into 'pseudo' plantations must be addressed before native forests are lost forever as functioning ecosystems. We refer to them as 'pseudo' because they are not really plantations; they never were planted and are not necessarily now mapped as plantations, though in some cases mapping has been altered to claim this, but they are being treated as such in an attempt to blur the boundaries between native forests and plantations.

A filmed first hand account of how plantation has been occurring by stealth, from 2009. The witness makes a rhetorical overstatement in an attempt to convey how a wood supply agreement with one corporation was influencing logging intensity and is correct in the prediction that the logging methods being used amounted to a strategy of conversion by stealthier converting species diverse native forest ecosystems into plantation like single species stands. Despite multiple organisations attempting to make this public knowledge through plane and drone footage the public are largely unaware, as government and the industry still insist on the fiction native forest logging is sustainable. Hence native forest conversion continued, unabated.

The witness also correctly predicts that forests logged in this manner, clear fell adjacent to 'almost' clear fell, will become highly flammable and that in future fire will 'rip through them'. This is exactly what has occurred across NSW native forests, which continue to be converted into flammable matchstick like landscapes.

Logging for conversion has exacerbated flammability. This is typical of what compartments look like across the NSW north coast as the almost clear felled compartments regrow into the 'stick forests'.

Academic studies and reports to parliamentary enquiries have been tracking the scale of conversion of the NSW native forest estate into pseudo-plantations. This is ongoing. Forest Conversion and timber certification in the public plantation estate of NSW: Implications at the landscape and policy levels

5 September 2022 , Converting Native Forests to Plantations PC 4 - tabled by Ms Sue Higginson MLC.pdf (nsw.gov.au)

Lack of independent oversight; legal system failure to redress for illegal practices of NSW state forestry department

Breaches of the Integrated Forestry Operations Approval (IFOA) and the subsequent Coastal Integrated Forestry Operations Approval (CIFOA) have continued via a legal/regulatory regime unconducive to independent oversight. We refer to the absurdity whereby one government department, the EPA, supposedly polices another, issuing (or not issuing regardless of break) taxpayer funded 'fines'. This is meaningless, when both departments are subject to the political will of the same state government. Coupled with a forest management regulatory system which specifically excludes NSW citizens from appealing to the courts in the event of an observed illegality by the state forest department, (i.e. the lack in NSW of 3rd party rights or 'standing' to take legal action), has resulted in a logging fraternity (government and those actively involved in the industry) that operates in a regulatory vacuum, i.e. no meaningful apolitical oversight. Independent verification of even inadequate logging guidelines is impossible in such a system. As early as 2011 the damning report 'If a Tree Falls' was published documenting the extent of IFOA breaches by NSW state forests and the lack of redress and the inadequacy of the fines. However the fines are meaningless. It is the NSW taxpayer who pays them. It is merely a money shift form one department to another.

The establishment of the Natural Resources Commission (NRC) around 2006 supposedly sought to rectify the embarrassing situation whereby the EPA had to try to enforce regulations within and across other departments dealing with natural resources.

wonder that successive governments have bowed down to such demands as:

- burning native forest biomass for energy (legalised in NSW though thankfully now banned at Federal level)

It's no

- attempting to introduce a 'nil tenure' approach to forest management (logging all forests across landscapes under the guise of hazard reduction known as Mechanical Fuel Load Reduction (MFLR)

The MFLR trials ended up being funded by taxpayers across three states at the behest of the then Forest Industry Advisory Council (FIAC).

With terms of reference promoting its influence in strategic policy options, and representing companies and stakeholders profiting from access, the SFRMP will not defend ESFM. Government policy should not be driven by undue private sector or union influence. This attempt to create a NSW Forest Industry Action Plan (FIAP) follows a Federal enquiry into the deleterious impact of lobbyists on policy development. It is important that the NSW FIAP doesn't end up dictated by the efforts of lobbyists. There is potential for this because, at the Federal level where decisions on native forests can be determined the lobbying role is sanctioned and financially supported by legislation, under an ill-advised Clause in the RFA Act 2002, Section 11.



As the Forest Industry Advisory Council (FIAC) the organisation then sitting in an advisory capacity within the Federal Forestry Minister's department at that time explained: One of FIAC's top 3 objectives is: the right trees in the right place at the right scale. Commonwealth of Australia 2016, Transforming Australia's forest products industry: recommendations from the Forest Industry Advisory Council, Forest Industry Advisory Council, Department of Agriculture and Water Resources, p.20

The so-called 'forest science' trials were intended to confirm it's in the best interests of all Australia's forests and woodlands to be thinned and burnt for their own 'protection'. Thus the Australian public is to be softened to accept the 'nil tenure' approach to 'preventative land management across the landscape'. Logging national parks re bushfire was to be the huge first step in removal of the 'tenure' barrier to industry access for wood with the idea that thinnings could be sold to the forest wood bioenergy industry.

Our representations to a

parliamentary enquiry in 2020 resulted in a unanimous refutation of the notion that burning forest biomass is carbon neutral. Now the Federal government has acknowledged that. However, in the process tax payers' money has supported the unscientific research of the industry pushing for native forests to be burnt for profit.

This treatment of native forests in NSW, conversion to single species, same aged stands has minimised their ecological resistance so that, with the pressures of climate change - drought, intense heat, disruption to and severity of seasonal impact and weather events - their very survival is now under threat. Without significant restoration intervention they are likely to become, through individual tree, stand, and in some case entire forest death, sources rather than sinks of atmospheric carbon.

Though industrial logging impacts have been studied, reported on, warned about by scientists and distraught regional communities witnessing this destruction, along with some of those involved in and frightened for the future of the industry, it is a tragic fact that even as this submission is being written, native forests continue to be destroyed. And this is even after the full extent of the damage they withstood in the 2019-20 fires has become common knowledge.

With every tree cut now, every inch of forest soil (and microorganism and insect habitat disturbed), we lessen the likelihood that we will be able to restore the complex interactions that once took place in our forests to the degree that we might help them continue basic ecological functions. Even those as fundamental as plant reproduction are at risk from loss of biodiversity, i.e. forest insect and small mammal pollinators to name just one example. Without maximum preservation of all necessary interactive characteristics and processes our forests will not withstand certain intensified climate change. Obviously that means also that we will not minimise what have become now, tragically, predetermined extinction trajectories. We urge you to take heed of evidence we can provide from:

- research into what takes place in NSW forests, including collation of evidence from timber industry workers and photographic and film material which we are happy to provide to that panel given constraints of this submission format

- previous submissions
- presentations to parliamentary enquiries
- participation in NSW Land and Environment Court proceedings

and the successive scientists' open letters and industry statements demonstrating the peril the NSW native forests are in, now, unpalatable as this information will prove to be.

In 2009 FCNSW harvest planner/mark up operators explained to AFCA members how native forests were being overcut in ever diminishing harvesting rotations in an attempt to run the native forests as if they were pine, i.e. a plantation. We have had to remove the link to this conversation but can provide it privately to demonstrate how conversion is occurring, i.e. manipulation of forest stands to create pseudo Blackbutt plantation



Transcript: Tuesday, 25 August 2020 Legislative Assembly Page 3

'We have already had a failure of the wood supply agreements, especially the native forest wood supply agreements, in New South Wales. Over the last 15 years we have had three incidents where the major recipient of wood supply agreements has sued New South Wales taxpayers for lack of supply. We have had to have a variation of wood supply agreements not that long ago and that alone cost taxpayers \$8.5 million. There is a failure to supply because, as the New South Wales Auditor-General said in 2009, North Coast forests have been cut faster than they can grow back. That warning was already there, and of course we had these incidents of compensation after that. They were not heeded.

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We have a situation where there has been such a collapse of the sawlog industry and such unsustainable clear-felling and overcutting of New South Wales forests, everywhere, but particularly the North Coast and the South Coast, that in the remake of the Integrated Forestry Operations Approvals [IFOA], the regulatory system, the Natural Resources Commission was pressured to find more wood. They were actually looking at rebranding some old-growth forests to become available and changing mapping and definitions in order to get more supply. With the New South Wales IFOA, because of a relaxation of some regulations, there is going to be a doubling of the biomass taken out of forests. These already decimated forests are in imminent danger of further cutting. One of the main things that have not even been looked at is that in the last bushfires, 45 per cent of the New South Wales public forests, both plantation and native, have been lost. 850,000 hectares out of 2 million hectares have been burned.'

Forestry practices in NSW under the RFAs and the inadequate IFOA and CIFOA regulatory frameworks.

Multi-year field surveys and investigations of the impacts of previous timber harvesting on biodiversity and reviews of scientific literature on timber harvesting impacts in Australia informed the establishment of the NSW regulatory code (Integrated Forest Operations Approval IFOA) by which NSW Regional Forest Agreements were implemented since the late 1990s. Unfortunately the full range of mitigation measures needed to protect and maintain key components of the forest environment most sensitive to logging and fire at compartment and landscape scales were not adopted. In addition, for almost every prescription in the IFOA Threatened Species operation manual, there were inserted 'exceptions' structured so that they became effective 'loopholes' to the TS regulations. The IFOA and the later Coastal IFOA omitted protection for fire refuges and were inadequate in provision for wildlife corridors, recruitment of late stage mature and oldgrowth forest and did not prevent limits to harvesting intensity. Though there were prescriptions for individual TS (frequently rendered ineffectual by other harvesting loopholes), at no time did

the IFOAs assess adequacy of reserves for maintenance of viable populations of the most sensitive species at landscape scales.

The lack of monitoring, scientific analysis and validation of the effectiveness of the IFOAs in the now more than 20 years of operating since RFA inception has not permitted adaptive forest management. At the same time forest operations have not been conducted according to a precautionary approach, i.e. accepting that limitations to current knowledge should mean not logging where knowledge of impact of rare and threatened species is not available. Instead, logging has continued regardless of omissions in knowledge of impact.

In addition it needs to be understood that the IFOA predictions were based on information gleaned from when logging was generally less intense. As a consequence the predicted logging impacts underpinning the IFOAs generally underestimated future impacts.

Likewise fire intensity was less severe in the recent past than experienced in 2019/20 so that fire impacts determined from surveys of past burning underestimated future impacts.

Under the precautionary principle, timber harvesting could be considered ecologically sustainable if it mimicked and did not exceed, or compound, the impacts of natural disturbances such as wildfire.

The entire regulatory framework that is supposedly based on ESFM (Ecological Sustainable Forest Management) has flouted the vital precautionary principle, and NSW logging has continued unabated despite known knowledge vacuums and at intensities hitherto not seen before, with little monitoring. This is what has led to the ecological and now economic collapse of NSW native forest logging.

Since the late 1990s industrialised logging in NSW has been the norm, with forests undergoing a series of experimental and often illegal harvesting practices, e.g. Australian group harvesting, and then Single Tree Selection (where the tree to be kept, not logged, is 'selected'.

This was in no way ameliorated with the amalgamation of 'coastal' NSW forest regions into one regulatory jurisdiction under the Coastal IFOA. In fact the Coastal IFOA saw the removal of previous (already flawed) protections, making ecological forest protection almost impossible. As the draft policy has indicated in Section 5.1 the new Coastal IFOA would see 'best practice guidelines, not strictly enforceable'.

Australian scientists and experts call for an end to land clearing and native forest logging. An open letter to the Prime Minister from 248 concerned scientists (endlandclearing.org.au) https://theforestpledge.com.au/

Society for Conservation Biology, Oceania: Scientists' declaration 2016: Accelerating forest, woodland and grassland destruction in Australia

Australia's land clearing rate is once again among the highest in the world.

Remaining forests and woodlands are critical for much of our wildlife, for the health and productivity of our lands and waters, and for the character of our nation. Beginning in the 1990s, governments gradually increased protection of these remaining forests and woodlands. However, those laws are now being wound back.

The State of Queensland has suffered the greatest loss of forests and woodlands. But while stronger laws by the mid-2000s achieved dramatic reductions of forest and woodland loss, recent weakening of laws reversed the trend. Loss of remnant forest has more than trebled since 2009 [1]. In Victoria, home to four of Australia's five most heavily cleared bioregions, land clearing controls were weakened in 2013 and in New South Wales, proposed biodiversity laws provide increased opportunities for habitat destruction [2].

Of the eleven world regions highlighted as global deforestation fronts, eastern Australia is the only one in a developed country [3]. This problem threatens much of Australia's extraordinary biodiversity and, if not redressed, will blight the environmental legacy we leave future generations.

Australia's wildlife at risk

Already, Australia's environment has suffered substantial damage from clearing of forests, woodlands and grasslands, including serious declines in woodland birds and reptiles [4]. Vast numbers of animals are killed by forest and woodland destruction. For example, between 1998 and 2005 an estimated 100 million native birds, reptiles and mammals were killed because of destruction of their habitat in NSW [5]; in Queensland, the estimate was 100 million native animals dying each year between 1997 and 1999 [6]. As land clearing once again escalates, so too will these losses of wildlife.

The loss of habitat is among the greatest of threats to Australia's unique threatened species, imperilling 60% of Australia's more than 1,700 threatened species [7]. Habitat protection is essential for preventing more species from becoming threatened in the future and adding to our burgeoning threatened species lists [8]. Habitat removal eliminates the plants and animals that lived in it; increases risks to wildlife from introduced predators; impacts surface and groundwaterdependent ecosystems, and fragments habitat so that individuals are unable to move through the landscape. It also reduces the ability of species to move in response to climate change [9]. The societal costs of forest and woodland destruction

Forest and woodland destruction also causes long-term costs to farmers, governments and society. Removal of native vegetation:

Hastens erosion and reduces fertility of Australia's ancient and fragile soils [10]

Increases the risk of soils becoming saline [11]

Exacerbates drought [12]

Reduces numbers of native pollinators and many wildlife species (such as woodland birds and insectivorous bats) that control agricultural pests [13]

Reduces shade for livestock from heat and wind.

Continued and increasing removal of forests, woodlands and grasslands increases the cost of restoring landscapes and reduces the chance of success. For example, the Australian Government has committed to plant 20 million trees by 2020 [14]. Yet many more than 20 million trees are cleared every year in Queensland alone.

Forest and woodland destruction increases the threat to some of Australia's most iconic environmental assets. Coral health on The Great Barrier Reef has declined precipitously from the effects of high temperatures associated with climate change, poor water quality, and the flow-on impacts it triggers (such as crown-of-thorns outbreaks) [15]. Native vegetation removal from catchments that flow into the Great Barrier Reef liberates topsoil and contaminants, reducing water quality and threatening the health and resilience of the Great Barrier Reef [16]. Governments have already spent hundreds of millions of dollars on this problem, with estimates of the full cost of restoring water quality as high as AUD\$10 billion [17].

Native vegetation is a major carbon sink. Forest and woodland destruction is the fastest-growing contributor to Australia's carbon emissions, as it transfers the carbon that was stored in the vegetation to the atmosphere. Hence, Australia's increasing forest and woodland destruction threatens its ability to meet its commitments under four major international treaties: the Convention on Biological Diversity, the World Heritage Convention, the Convention to Combat Desertification, and the Framework Convention on Climate Change.

Urgently-needed solutions

- Develop and implement a strategy to end net loss of native vegetation, and restore overcleared landscapes

- Recognise all biodiversity, not just threatened species, in policy and legislation for the management of native vegetation

- Establish clear, transparent and repeatable national reporting of clearing of native vegetation

- Use rigorous biodiversity assessment methods for assessing clearing requests, accounting for all potential impacts, including cumulative and indirect impacts

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

Demand is increasingly softwood plantations. Almost all builders prefer to work in pine and softwood laminated beams, not heavy hardwood.

Green steel is moving ahead, slowly. Regardless almost all rural sheds are steel now with no wood component. This is largely due to labour costs. Telegraph poles are now being replaced with concrete. Rail sleepers no longer wood.

There is however a massive and often unarticulated threat to the forest resource in NSW and that is from

a) Wood being utilised as a thermal fuel for industry

b) Wood being utilised for conversion to combustible fuel given the economic impetus provided by the transport and heavy industrial sectors to claim green fuel sources Biofuels offer hope for hard-to-decarbonise sectors | The Australian

The fine print in the above link demonstrates that the market is still open to receiving vast amounts of woody 'waste' in order to fuel the aviation industry. It was exactly this definition of 'wase' or 'residue' which was the basis of the logging industry's intent to market native forests (no longer viable as a saw log industry because over-logged) as the biomass foundation for subsidised renewable electricity. Fortunately the Federal Labor government acquiesced to science by outlawing this statement of subsidy was not in accordance with science. Likewise we hope that the NSW government will not allow native forest biomass to be utilised as a fuel, an energy source or anything other than a carbon and biodiversity treasure by ensuring forests are left standing and recovering, despite the temptations of green washing industries.

Mixed hardwood plantings need to be undertaken by private landholder and in general to provide niche hardwood demand.

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

We will not comment on public softwood or hardwood plantations except to warn that the FIAP should ensure that any plantations are indeed that and should go back over records to before 2009

We will talk about private native forestry below but do NOT consider the state forest agency a legitimate manager of this for reasons we have already stated and more below.

In general we consider that 'genuine' softwood and hardwood plantations should be the limit of State Forests' jurisdiction. In saying this it is vital that the previously 'converted' native forests which have by stealth been 'added' onto the plantation estate since a 2009 re-mapping exercise began, should not be considered hardwood plantation. There needs to be an investigation of how boundaries have been moved since then and a reversal of those 'plantation' grabs that have been made.

The travesty of Private Native Forestry in NSW since its formal inception in the mid 1980s. The history of the development of the Private Native Forest Code development in NSW is shameful. As early as the mid 1980s it became obvious NSW State Forests was failing in its responsibility to provide sustainable timber sources. The department embarked on a programme that looked encouraging but turned out to be a rip off of private landholders and a desecration of the landscape that resulted in hardwood plantation stands that largely failed.

What happened? State Forest public relations staff convinced landholders that they could be a part of sustainable forestry industry by allowing state forests to establish hardwood plantations on their land that would be ready for harvest in approximately 25 years. They marketed these as schemes for securing the future of their children and grandchildren. In reality what occurred was State Forests selecting the most fertile areas on any property and logging mature stands of critical ecosystems. They then planted experimental patches of monocultures, i.e. Blackbutt or Spotted Gum or some other species, not necessarily suitable to the location. This was in full sway by 1997. Almost all of these state forest planted private plantations failed to deliver. They frequently ended up spindly unhealthy stands of species. Many landcare co-orindators, citizens and ecologists were appalled at the destruction of mature forest ecosystems for this result. The subsequent stage of PNF: For a while, given this failure and the unpopularity of the State Forests' foray into plantations on private land PNF wasn't high on the state forest department agenda. However, when it became apparent that the over committed wood supply agreements meant that FCNSW would fail to deliver there was a concerted effort to 'get the wood' from private landholders. This time the department didn't bother about the 'future' or about establishing plantations. They had already failed in that. They would simply log what was left of private native forests.

Developing PNF codes that would allow for maximum wood removal began: As the public native forest resource was obviously failing and the supply shortfall had to be 'made up. from private land the successive PNF codes that were developed to legitimise what was often almost total clear fell began appearing. Time does not permit us to track that here but as an example

it had become FCNSW even exempted Koala habitat from that regime, effectively. This information will no doubt be supplied by other organisations.

What should future PNF look like?

We now know that 'nature doesn't like a monoculture' and the science now explains it. It's readily available and essentially demonstrates that tree species interact below the soil so that the ability and demands of one species in bringing vital nutrients and other soil benefits affect another species. Time constraints do not allow us to expand further but it is one of the reasons why single species plantations do not flourish. For examples of what NSW should be doing in terms of private native forestry NSW should look to WA which has been planning the exit from the hardwood native logging industry for some time while educating private landholders on how they can become sustainable hardwood suppliers. It need not be a problem. The most important thing is not to let the State Forest Agency control this input into wood supply. Their failures and shocking conduct to date in relation to private landholders tree resources makes them an inappropriate manager of the private native forest industry.

Private Native Forestry should be that , i.e. private, without intervention by government in terms of payment or procurement. By doing that inappropriate intervention by a state forest agency attempting to meet production quotas will be avoided. The private native forest estate is vital for the recovery of the public native forest estate, often bordering with publically owned forests and creating critical corridors for the movement and reproduction of all forms of animal life however, private native forestry should not be a green light for an 'open slather' approach to remaining vital forest ecosystems. The public should be educated. Strict enforcement of conservation guidelines should occur and only a regulatory agency not involved in supply can do this objectively.

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

We do not consider the state forest department an appropriate manager of native forests given the department's history of destruction. As we believe it's vital that native forests are not logged

and that they as are soon as possible restored (before irreversible damage occurs) we believe that the management of public native forests should be done by a separate department with a conservation and restoration ethos. The logical one would be national parks with heavy public investment in a community inclusive programme that will be long term.

AFCA delivered a plan, a restoration plan, that would pay for itself, via a comprehensive 2 hour presentation to the ACTU in 2020 after the NSW Victorian bushfire catastrophe. It was obvious that logging native forests now utterly decimated not only by decades of unsustainable logging but ravaged also by fire, should cease. We had long been working with NSW environmental organisations and various environment ministers to promote alternative scenarios for NSW native forests, scenarios that involved tourism, carbon abatement and intensive community collaboration in restoration.

The plan is an extremely comprehensive file which covers the whole of Australia. Fortunately two states have now moved toward its adoption if not in the comprehensive manner which would maximise outcomes but in some essential elements, i.e. ending native forest logging. By adapting this comprehensive approach to NSW huge environmental social and economic results could ensure.

Before providing the link we would emphasise that this is a practical, not a pie in the sky solution. It can be costed and it can prove economically beneficial to the state. The social improvements can be vast.

How can this occur? The economic benefits from actively engaging the community in restoration are enormous. First, taxpayers would no longer be subsidising native forest logging sector losses. Secondly, the savings to the health system in a physically engaged population are in the hundreds of millions. We could expand but time does not permit. Best to look at the file and imagine. Also, tourism would benefit enormously but restored landscapes. The health budget would save money. There could be a highly skilled workforce as a result. Skills could be exported. https://docs.google.com/presentation/d/1RN41CuXBheE6KOTXYZMbSu48eciHrnOF/edit?usp=sha ring&ouid=103812988325870757658&rtpof=true&sd=true

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

Before dealing with opportunities to realise carbon and biodiversity offset market benefits we will analyse the contribution of native forest logging to emission generation and the opportunity cost it represents in terms of voided atmospheric carbon capture.

It is negligence of the highest order to continue to allow emission intensive industrial logging of native forests to further deplete these critical carbon stores. Heavy, fossil fuel dependent machinery is needed to log and transport dense product medium and long distances; the logging depletes native forest carbon stores by up to 70 per cent, from both trees and soil, which cannot be recaptured within current logging cycles. Industrial logging rotation cycles degrade forests to the extent they can become sources, not sinks, of carbon.

The opportunity cost of logging forests is immediate diminution of forests capacity to draw carbon down from the atmosphere and safely store it.

The longer trees are left to mature the more carbon they capture and store. (Stephenson, N.L. et al. Rate of tree carbon accumulation increases continuously with tree size. Nature 507, 90,93 (06 March 2014) doi:10.1038/nature12914). It therefore would be logical to allow native forest ecosystems to mature in entirety to reach the maximum carbon sequestration and storage potential of which they are capable. The carbon stock for intact South Eastern Australian eucalypt forests has been found to be about 640 tonnes per hectare.

Given the impact of logging on carbon abatement potential of forests and the fact that industrial logging intensity and frequency can degrade forests to the extent they can begin to emit, rather than capture carbon, it is logical that logging should stop. Already some forests across the world are becoming carbon emissive, as they degrade or die as a result of disruption of ecological processes due to overclearing. (Popkin, G. Tropical forests may be carbon sources, not sinks. Nature. doi:10.1038/nature.2017.22692, 2017

Unfortunately some parts of NSW are already perilously close to this situation. The prolonged drought of 2019 that lead up to the catastrophic fires of 2019-20 across NSW and Victoria saw instances of tree death. In some place entire stands of trees died and did not recover after the flooding rains of early 2020. This pattern was repeated in 2023 when prolonged drought in NSW, especially the Hunter and the NSW North Coast, saw stands of trees dying. Professor Brendan Choate has been monitoring this extreme danger.

Increased carbon storage in intact native forests can be included in State and National carbon accounts. Carbon does not have to be traded to show these benefits on carbon accounts. To protect and not log the native forests and woodlands of Australia is the pathway to the greatest climate change mitigation possible from terrestrial systems.

Why we do not recognise carbon and biodiversity offset trading markets as benefits and do not consider it appropriate to attempt to utilise forests in this manner, i.e. by attempting to monetise what should already be mandatory protection.

Carbon Offset Trading and Forests

Forests around the world , and in Australia , are already dying from high concentrations of GHGases. Emission reduction is too urgent for carbon trading opportunism. Neither emission reduction nor forest protection is contingent upon the other. Both must occur, simultaneously, and as a matter of urgency.

Logging lobby affiliates want expanded access to native forests beyond their value for wood manufacture. They want rights - access - to forests as a means of entering carbon offset trading markets The Prime Minister has indicated his support for carbon emission offset trading and the NSW Premier has stated that NSW forests will have to pay their way is they are not to be logged, presumably intending to trade forest protection for the issuing of ACCU credits to carbon polluters as offsets to their continuing practice .

There are grave problems with monetising native forests as a 'tradeable' commodity. Domestic and international financiers investing, trading in, or brokering access to forests as a carbon trading commodity support a lobbying sector that can help them ensure native forests remain 'open', i.e. a tradeable commodity. Rhetoric, that NF Logging is sustainable, is used for this purpose. Forest (and other ecosystem) protection, used as a bargaining mechanism to offset ongoing GHGas emitting, is now understood to be a dangerous concept that delays genuine emission reduction. AOur comprehensive list of studies is below demonstrating the Failure of Emission Offset Trading Markets

Emitters purchase an 'offset', a tradeable licence to pollute in the form of a carbon credit. The concept of polluter pays is not new. Australia adopted it in the 1970s. Polluting continued moderated by fines; incentives to find alternative technologies stalled; nature suffered. A Government that could end logging of its native forests right now - might choose not to do so, or to delay doing so, until paid (the right price) by an emitter, when protecting its native forests is what it should be doing, regardless, immediately. There will never be a right methodology for determining the level of payment that should be required from emitters to extend their licence to pollute. This is an issue of survival, not money. Controversial carbon credits flood COP28, yet still no rules (phys.org), Carbon Markets do not need to be fixed. They need to be eliminated. Appendix: Investigations into the Failure and Corruption of Emission Trading Markets Controversial carbon credits flood COP28, yet still no rules (phys.org)

https://phys.org/news/2023-12-controversial-carbon-credits-cop28.html **GUARDIAN / DIE ZIET report** More than 90% of rainforest carbon offsets by biggest provider are worthless, analysis shows The Guardian January 18, 2023 https://www.theguardian.com/environment/2023/jan/18/revealed-forest-carbon-offsets-biggestprovider-worthless-verra-aoe Greenwashing or a net zero necessity? The Guardian January 18, 2023 https://www.theguardian.com/environment/2023/jan/18/greenwashing-or-net-zero-necessityclimate-scientists-on-carbon-offsetting-aoe Verra's response January 18, 2023 https://verra.org/verra-response-guardian-rainforest-carbon-offsets/ "Carbon Markets do not Need to be Fixed. They Need to be Eliminated" | The Corner House https://www.thecornerhouse.org.uk/resource/carbon-markets-do-not-need-be-fixed-they-needbe-eliminated Phantom offsets and carbon deceit Die Zeit January 19, 2023 https://www.zeit.de/wirtschaft/2023-01/co2-certificates-fraud-emissions-trading-climateprotection-english?utm_referrer=https%3A%2F%2Fwww.google.com%2F CIFOR-ICRAF scientists caution not abandon forest carbon offsets in wake of critical coverage January 23, 2023 https://www.cifor-icraf.org/news/corporate-news/cifor-icraf-scientists-caution-not-to-abandonforest-carbon-offsets-in-wake-of-critical-coverage/ Showcase project by the world's biggest carbon trader actually resulted in more carbon emissions Follow the Money January 27, 2023 https://www.ftm.eu/articles/south-pole-kariba-carbonemission?share=T27z18000qEQSQF0PwDZ132nSC%2FEdxwBqIytq%2F8bp7%2F%2FCVXfnJq98Zcg mUkgyJk%3D END GUARDIAN / DIE ZIET report https://www.theguardian.com/environment/2024/mar/15/money-carbon-credits-zimbabweconservation-aoe South Pole and the Kariba REDD+ project **REDD Monitor** February 2, 2003 https://redd-monitor.org/2023/02/03/south-pole-and-the-kariba-redd-project-an-investigativereport-by-follow-the-money-exposes-the-rot-at-the-heart-of-redd/ Are carbon markets really financing climate action? Carbon Market Watch February 2, 2022 https://carbonmarketwatch.org/publications/secret-intermediaries-are-carbon-markets-reallyfinancing-climate-action/ Global corporation's climate pledges are 'misleading', not credible Grist February 13, 2003

https://grist.org/accountability/global-corporations-climate-pledges-are-misleading-notcredible/?utm_campaign=Hot%20News&utm_medium=email&_hsmi=245989808&_hsenc=p2AN qtz-8UdcWVYQL-KXS5BR53N8GcZF_h9tPTQdLs6Y59toeKNO64kZEQ_RVRIanLgo7JvFjAWEAq0m73GkISJoxTdZQ7Wra CYQ&utm_content=245989808&utm_source=hs_email Carbon market intermediaries act with little transparency, report says (CMW report) Mongabay February 24, 2023 https://news.mongabay.com/2023/02/carbon-market-intermediaries-act-with-little-transparencyaccording-to-report/ Biggest carbon credit certifier to replace its rainforest offsets scheme The Guardian March 10, 2023 https://www.theguardian.com/environment/2023/mar/10/biggest-carbon-credit-certifierreplace-rainforest-offsets-scheme-verra-aoe The Guardian view on carbon offsetting: an overhaul is necessary April 2, 2023 https://www.theguardian.com/commentisfree/2023/apr/02/the-guardian-view-on-carbonoffsetting-an-overhaul-is-overdue?CMP=twt_a-environment_b-gdneco Carbon dioxide removal is not a current climate solution , we need to change the narrative Nature, April 4, 2023 https://www.nature.com/articles/d41586-023-00953x?utm_source=Nature+Briefing&utm_campaign=c62387118c-briefing-dy-20230404&utm_medium=email&utm_term=0_c9dfd39373-c62387118c-44055257 Chevron's junk climate action agenda **Corporate Accountability** https://corporateaccountability.org/resources/chevrons-junk-agenda-report/ Chevron's carbon offsets are mostly junk The Guardian May 23, 2023 https://www.theguardian.com/environment/2023/may/24/chevron-carbon-offset-climate-crisis Joseph Romm, Are carbon offsets unscalable, unjust, and unfixable, and a threat to the Paris Climate Agreement? A University of Pennsylvania Center for Science, Sustainability, and the Media White Paper June 2023 https://web.sas.upenn.edu/pcssm https://bpb-us-w2.wpmucdn.com/web.sas.upenn.edu/dist/0/896/files/2023/06/OffsetPaper7.0-6-27-23-FINAL2.pdf podcast with David Roberts: https://www.volts.wtf/p/voluntary-carbon-offsets-are-headed?utm_source=podcastemail%2Csubstack&publication_id=193024&post_id=135538536&utm_medium=email#details Traders in CO2 credits saddled with stranded asset pile Bloomberg August 22, 2023 https://www.bloomberg.com/news/articles/2023-08-22/traders-in-co2-credits-saddled-with-vaststranded-asset-pile#xj4y7vzkg https://www.latimes.com/business/story/2023-08-22/carbon-trading-co2-credits Carbon credit speculators could lose billions as offsets deemed worthless The Guardian

August 24, 2023 https://www.theguardian.com/environment/2023/aug/24/carbon-credit-speculators-could-losebillions-as-offsets-deemed-worthless-aoe?CMP=Share_iOSApp_Other A leading corporate strategy for battling climate change is all hot air, study says The Hill August 24, 2023 https://thehill.com/policy/equilibrium-sustainability/4169871-a-leading-corporate-strategy-forbattling-climate-change-is-hot-air-studyfinds/?utm_campaign=Hot%20News&utm_medium=email&_hsmi=271728808&_hsenc=p2ANqtz--soVPLZfmovtWjklbYGiizUV4j3bpquFmAXUgJTaor66amXM1KEEddm8ulLMZf-Udtv_ScZaO1vgWtiw49O8ITvlRU0w&utm_content=271728808&utm_source=hs_email REDD+ projects falling fall short of claimed carbon cuts, study finds Mongabay August 25, 2023 https://news.mongabay.com/2023/08/redd-projects-falling-far-short-of-claimed-carbon-cutsstudy-finds/ Shell signals retreat from carbon offsetting The Guardian September 8, 2023 https://www.theguardian.com/environment/2023/sep/08/shell-signals-retreat-from-carbonoffsetting#:~:text=Shell%20has%20become%20the%20latest,labelling%20scheme%20based%20o n%20offsetting Offset markets hit by fresh allegations of false CO2 claims (Berkeley study) Bloomberg September 14, 2023 https://www.bloomberg.com/news/articles/2023-09-14/popular-carbon-credits-fail-to-offsetemissions-probeshows?srnd=green&utm_campaign=Hot%20News&utm_medium=email&_hsmi=274420786&_hs enc=p2ANqtz-9S8xvdfksfiOiOzCQiWU2A2c1gfJFIVBLXKCQZuP9EEmlgPlxQ-5j3k3zlDHDc3iQpmcrgloFuH-v9TAJkrwTrnG34g&utm content=274420786&utm source=hs email#xj4y7vzkg Elastic methodologies enable REDD+ forest projects to exaggerate climate impacts, study reveals (Berkeley study) Carbon Market Watch September 15, 2023 https://carbonmarketwatch.org/2023/09/15/elastic-methodologies-enable-redd-forestryprojects-to-exaggerate-climate-impact-study-reveals/ Top carbon offset projects may not cut planet-heating emissions The Guardian September 19, 2023 https://www.theguardian.com/environment/2023/sep/19/do-carbon-credit-reduce-emissionsgreenhouse-gases VERRA response to voluntary carbon market stakeholders on the latest Guardian attack September 19, 2023 https://verra.org/statement-vcm-stakeholders-latest-guardianattack/#:~:text=While%20we%20were%20granted%20a,worst%20impacts%20of%20climate%20c hange. Carbon Brief reports September 24, 2023

In-depth Q&A: Can carbon offsets help to tackle climate change? https://interactive.carbonbrief.org/carbon-offsets-2023/?utm_content=bufferbff2b&utm_medium=social&utm_source=twitter.com&utm_campaign =buffer Glossary: https://interactive.carbonbrief.org/carbon-offsets-2023/glossary.html Mapped: The impact of carbon-offset projects around the world (updated daily) https://interactive.carbonbrief.org/carbon-offsets-2023/mapped.html?utm_source=cbnewsletter&utm_medium=email&utm_term=2023-10-04&utm_campaign=Daily+Briefing+04+10+2023 Webinar: How can carbon markets be reformed? https://www.carbonbrief.org/webinar-how-cancarbon-offsets-be-reformed/ How this popular climate 'solution' could tank our progress **New Republic** September 27, 2023 https://newrepublic.com/article/175773/popular-climate-solution-tank-progress Criticism of carbon offsets is nothing new **REDD-Monitor** September 30, 2023 https://reddmonitor.substack.com/p/criticism-of-carbon-offsets-is-nothing



The Hon Anthony Albanese Prime Minister of Australia PARLIAMENT HOUSE, CANBERRA ACT 2601

9th April, 2024

Re: Revising the National Forest Policy (NFP) 1992

Dear Prime Minister,

Since the 1992 National Forest Policy (NFP), three decades of scientific, economic and legal examination proves native forest logging (NF Logging) ecologically¹ and economically unsustainable.²

Our international commitments require that NF Logging ends. The public demand it. It is an ethical imperative that protection and restoration of extant native forest is a premise for the NFP review.

Detailed reasoning covering aspects of this issue are provided below and in associated appendices.

- 1. NF Logging is not ecologically sustainable
- 2. NF Logging is not economically sustainable
- 3. The Public demand NF Logging End
- 4. Carbon Offset Trading and Forests
- 5. Vulnerability of forests to Climate Change: Impact demands resilience response
- 6. What would be required to ensure an NFP 'contemporary' and 'fit for purpose'? a Honouring international climate and biodiversity commitments b Resisting false and outmoded logging industry rhetoric
- 7. The conflict of interest in a logging lobby entrenched in the Federal Forestry Department
- 8. Science must be the foundation of a NFP review
- 9. Concluding Comments

¹ Under ESFM principles, Australian forest management should:

Maintain the:

ecological processes within forests formation of soil, energy flows and the carbon, nutrient and water cycles);

biological diversity of forests; and

Optimise the environmental, economic and social benefits to the community within ecological constraints.

² Branching Out: Exploring Alternate Land Use Options for the Native Forests of NSW - Blueprint Institute

1. NF Logging is not ecologically sustainable

Australian native forest logging (NF Logging) was meant to accord with Environmentally Sustainable Forest Management:

Maintaining the ecological processes within forests (the formation of soil, energy flows and the carbon, nutrient and water cycles);

Maintaining the biological diversity of forests; and

Optimising environmental, economic and social benefits to the community within ecological constraints.

Consistently courts have proved regulatory frameworks for NF Logging fail. Scientists now consider NF Logging inherently unsustainable. **Appendix 1: Regulatory Failure. Appendix 2: Scientist statements.**

2. NF Logging is not economically sustainable

Economic analysis advises subsidisation to this destructive sector should stop.

The Victorian Parliamentary Budget Office found the state would be \$190 Million better off between 2020 and 2030 without native NF Logging.³ Hence Victoria plans to end it.

FCNSW reported a loss of \$28 Million in 2020-21.⁴ Appendix 1: Economic failure of NF Logging sector

3. The Public demand NF Logging End

The public are outraged by NF Logging:

Witnessing the demise of the condition of native forests and understanding the ecological and climate impact, the majority of Australians want native forest logging to end, now. Another poll in late 2023 demonstrated that majority to be 7 in 10 (69%) 5

Previous polling – ignored - begs the question: Why do politicians continue to defy public opinion regarding native forests?

³ Parliamentary budget office Victoria, Policy costing, End native forest logging <u>https://pbo.vic.gov.au/response/652</u>

⁴ Forestry Corporation of NSW, annual report 2020-21 <u>https://www.forestrycorporation.com.au/_data/assets/pdf_file/0012/1376877/forestry-corporation-annual-report-2020-21.PDF</u>

⁵ In 2023 <u>a poll taken by the Australia Institute</u> showed that 7 in 10 (69%) of Australians support extending native forest logging bans to NSW and Tasmania. This includes 75% of Labor voters.

WHY DO POLITICIANS CONTINUE TO DEFY PUBLIC OPINION

Forest & Wood Products Australia, survey of 13,000 Aug 2018			
Is native forest logging acceptable or unacceptable?	Rural	Urban	
Unacceptable	65%	70%	
Acceptable	17%	10%	

Community perceptions of Australia's forest, wood and paper industries: implications for social license to operate [draft]. Jacki Schirmer, Lain Dare, Mel Mylek University of Canberra



Appendix 1: Collapse of Social Licence.

Why DO politicians continue to defy public opinion and prop up Native Forest Logging? when they could do the right thing without risking votes?

4. Carbon Offset Trading and Forests

Forests around the world – and in Australia – are already dying from high concentrations of GHGases. Emission reduction is too urgent for carbon trading opportunism. Neither emission reduction nor forest protection is contingent upon the other. Both must occur, simultaneously, and as a matter of urgency.⁶

⁶ <u>Why Native Forest Logging And Clearing Must End And Forests Not Be Burnt For Energy - Australian</u> <u>Forests & Climate Alliance (forestsandclimate.org.au)</u>

Logging lobby affiliates want expanded access to native forests beyond their value for wood manufacture. They want rights - access - to forests as a means of entering carbon offset trading markets. You have indicated your support for carbon emission offset trading and the role of forests in that trade. There are grave problems with monetising native forests as a 'tradeable' commodity. Domestic and international financiers investing, trading in, or brokering access to forests as a carbon trading commodity support a lobbying sector that can help them ensure native forests remain 'open', i.e. a tradeable commodity. Rhetoric, that NF Logging is sustainable, is used for this purpose. Forest (and other ecosystem) protection, used as a bargaining mechanism to offset ongoing GHGas emitting, is now understood to be a dangerous concept that delays genuine emission reduction. **Appendix 4:** Failure and Corruption of Emission Offset Trading Markets

Emitters purchase an 'offset', a tradeable licence to pollute in the form of a carbon credit. The concept of polluter pays is not new. Australia adopted it in the 1970s. Polluting continued moderated by fines; incentives to find alternative technologies stalled; nature suffered.

A Government that could end logging of its native forests right now - might choose not to do so, or to delay doing so, *until paid (the right price) by an emitter*, when protecting its native forests *is what it should be doing, regardless, immediately*. There will never be a right methodology for determining the level of payment that should be required from emitters to extend their licence to pollute. This is an issue of survival, not money. <u>Controversial carbon credits flood COP28, yet still no rules (phys.org)</u>, <u>Carbon Markets do not need to be fixed</u>. They need to be eliminated. **Appendix 4: Failure for the state of the state**

5. Vulnerability of forests to Climate Change: Impact demands resilience response Climate Change induced Tree Death, Appendix 3: Historical Damage to Australian Forests, Tree Death from Climate Change

Forests worldwide are experiencing warmer temperatures and an increased frequency of severe droughts, insect outbreaks, and wildfires. <u>These disturbances have led to a global increase in large-scale tree mortality events even in drought and heat tolerant ecosystems.</u>

<u>Global field observations of tree die-off reveal hotter-drought fingerprint for Earth's forests | Nature</u> <u>Communications</u> concluded in January 2024:

"Although forests often are invoked as an important part of the solution to the present global climate crisis, their role as reliable carbon sinks in mitigating climate change depends on their ability to survive further warming which our global hotter-drought fingerprint identifies as an imminent threat." <u>Tree Mortality in Australian ecosystems: past, present and future</u>

Previously confined to Jarrah forests of WA, the Choat Laboratory in NSW is monitoring escalating NSW tree mortality. <u>Canopy dieback and recovery in Australian native forests following extreme drought</u> <u>Scientific Reports (nature.com)</u>

Negative impacts of elevated CO² on forest health, resilience, longevity

https://www.nature.com/articles/s42003-020-0839-y

The Problem of Tree Senescence in the Role of Elevated CO2 and the Carbon Cycle - McMahon - 2024 - AGU Advances - Wiley Online Library

Higher Carbon Dioxide Levels Prompt More Plant Growth, But Fewer Nutrients | CFAES (osu.edu)

Delaying protection of natural forests and/or protecting them through offset arrangements that facilitate emissions elsewhere, hastens the demise of forests. We are seeing this now in Australia.

The logging lobby seeks to entrench itself as manager of forests 'for climate change'. Only one of the lobby's false claims has been rejected, and by this Federal Government, that combusted native forest biomass is a carbon neutral energy source. However equally dangerous aspects of its 2016 blueprint for forest management to 2050remain, i.e. Mechanical Fuel Load Reduction, (MFLR), 'ecological' thinning and outright clearing of native forests under the guise of bushfire protection, now proposed in Victoria. **Appendix 5: Logging Industry Agenda for Australia's Native Forests**

Despite the documented and visually obvious parlous state of Australian native forests (Maps, Section 8.), Government still acquiesces to the logging lobby's description of NF Logging as 'sustainable'. This facilitates its push to increase its access to forested areas, including expansion by stealth into the national reserve system. Under the guise of bushfire protection and forest health the logging industry and Government might claim forests are being sustainably managed to mitigate climate change (through a system of self-accredited management that would render more forests open for carbon offset trading) when in reality they are legitimizing ongoing disturbance. This is already occurring in several areas of the country. National Parks are already being logged in partnerships between government and the logging lobby. Logging is already in Murray Valley National Park, NSW.

To allow ongoing access of the logging industry into native forests, including under the pretext of some 'sustainable management' prerequisite for their certification for carbon offset trading, might be politically expedient and a potential revenue source, but the Australian pubic will see through it. And they will be appalled.⁷ Appendix 5: Logging Lobby Agenda for Australian Forests.

This government must resist the logging lobby and the lure of carbon offset trading, end NF Logging and embark on a restoration agenda based on science.

6. What could ensure an NFP 'contemporary' and 'fit for purpose'?

A National Forest Policy 'contemporary' and 'fit for purpose' will:

Honour: international climate and biodiversity commitments and Resist: decades old rhetoric about the sustainability of NF Logging

⁷ https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/forestry/australiasforest-policies/fiac/transforming-australias-forest-products-industry.pdf

a Honour international climate and biodiversity commitments

In 2016 our scientists collectively agreed we are failing to meet international commitments:

'Australia's increasing forest and woodland destruction threatens its ability to meet its commitments under four major international treaties: the Convention on Biological Diversity, the World Heritage Convention, the Convention to Combat Desertification, and the Framework Convention on Climate Change'

You have said that a new NFP will be 'contemporary and fit for purpose'. It will therefore need to comply with international commitments and the most relevant now is the Global Stocktake Decision ⁸ emphasizing interdependence and mutual effect of the climate and biodiversity crises. It calls for all natural forests - globally - to be protected to promote resilience so they can maintain and increase carbon uptake and storage. The deadline for conserving, protecting and restoring nature and ecosystems for emission reduction and biodiversity conservation is 2030 and is to take place with safeguards, social and environmental in line with the <u>Kunming-Montreal Global Biodiversity</u> <u>Framework</u>.⁹

For Australia this means immediately protecting native forests now so ecologically degraded from logging that their survival is at risk. You don't protect a forest by logging. You don't restore one that is already degraded by continuing to log. You end logging and then you restore, as swiftly as possible.

b Resist

- decades old false claims perpetuated by the logging lobby through the Australian Forests Products Association,¹⁰ that native forest logging is sustainable,
- perpetuation of those claims by the Strategic Forest Renewable Materials Partnership (SFRMP), the logging lobby that replaces the Forest Industry Advisory Council (FIAC) the preceding logging lobby (entrenched by legislation)¹¹ in the office of the Federal Minister for Forestry.
- understandings wrested from Federal leaders at orchestrated AFPA dinners whereby the logging lobby assesses its success as leaders agree NF Logging to be sustainable, good for climate and ongoing.¹² <u>"The Prime Minister has backed Australia's sustainably managed native and plantation timber</u>

industries role in achieving Australia's net zero emissions goal and ending global deforestation"

⁸ Cop 28 Dubai

https://www.montrealprocess.org/The_Montreal_Process/About_Us/index.shtml

¹⁰ AFPA is the peak industry body for the pulp and paper, and wood processing and resources industries. (FIAC Terms of Reference, 2014)

¹¹ via Section 11 of the controversial Regional Forest Agreement Act 2002.

¹² "The Prime Minister has backed Australia's sustainably managed native and plantation timber industries role in achieving Australia's net zero emissions goal and ending global deforestation:

the temptation to delay an outright ban on native forest logging in order that native forests remain 'open' to the carbon emission offset trading market internationally

False claims, still being echoed by Government, are that native forest logging.¹³

• is 'World's Best Practice'

Images should suffice but scientific studies proving the nature and scale of destruction abound. A recent study demonstrates 244already threatened forest dependent species still undergoing affects from contemporary forest logging degradation. ¹⁴ A paucity of tree hollows is driving mammalian extinction and biodiversity loss across the continent. Native forest logging rotations can be less than 20 years and yet tree hollows take 100-120 to develop. These are non-negotiable facts. **Appendix 1: Biodiversity, catchment, soil damage from logging native forests**

Independent audits of pubic native forest logging repeatedly uncover: lawlessness, regulatory failure by state forest agencies, potentially irreparable habitat loss through soil and catchment damage, species and ecosystem decline. The true cost of the damage to communities witnessing and experiencing the ravaging of local landscapes and its impacts on their welfare and properties has not even begun to be probed. **Appendix 1: Regulatory Failure**

• provides a sustainable source of biomass for combustion for energy and thermal heating (18/6/2020 Arena Roadmap Submission)

False and now discredited by This Federal government which **in this instance did listen to the science** and reversed legislation deeming native forest biomass combustion renewable and carbon neutral.

• is carbon positive

Patently false. Logging destroys native forest carbon stocks through the release of above and below ground carbon, and destroys or drastically diminishes the capacity of a native forests to sequester and store carbon at maximum potential rates, which in Australia are very high. There is an estimated 25.5 gigatonnes (CO2e) in a 14.5 million ha study area in south eastern Australian with an estimated recovery potential of 7.5 gigatonnes. **Appendix 1: Carbon Sequestration And Storage:** Green Carbon Part 1 (anu.edu.au)

• occurs only over a tiny fraction of forest expanse and all native forest managed by AFPA members is regenerated

Misleading and false. Even at only at 2% volume logged per annum the entire estate would be logged over 50 years, yet recovery from logging rotations for native forests is a minimum of 150-200 years owing to the necessity for tree hollows to form over that time on which multiple birds and animals are dependent. A paucity of tree hollows is driving mammalian extinction and biodiversity loss across the continent and restoration of the public native forest estate *is not undertaken* by AFPA members.

¹³ (conducted by its members, which includes state forest agencies and those companies issued contracts by forest agencies)

¹⁴<u>The impacts of contemporary logging after 250 years of deforestation and degradation on forest-dependent threatened species | bioRxiv</u>

• according to the IPCC delivers the best climate change mitigation results

False, (cherry picked) and outdated. The IPCC **now** states 'restoration of forests and other ecosystems offer the largest share of economic mitigation potential' Section 4.5.4 and 'restoring natural forestsreduces ecosystem vulnerability to climate change' (IPCC Climate Change 2023 Synthesis Report) After receiving the science the UN Secretary General pleaded 3 years ago: stop fossil fuel combustion and protect the world's native forests for maximum excess CO² atmospheric sequestration and storage. <u>https://news.un.org/en/story/2021/03/1086222</u>

Protect means exactly that - protect - stop logging them. Don't 'sustainably' cut them down.

Since global deforestation and forest degradation has resulted in about a third of total anthropogenic CO_2 emissions since 1850 it's obvious halting logging is fundamental to emission reduction and CDR.¹⁵

• is economically sustainable and provides lots of jobs

Again, false, as demonstrated by a plethora of economic analysis and examination of state forest agency financial reports.

In November 2023 economic analysis of the native forest logging sector concluded, in relation to NSW and Tasmania (as Victoria and WA have already decided to end NF logging) – that <u>"While not fully</u> transparent there is strong evidence that the budgetary burden of subsidizing NFL operations in NSW and Tasmania is significant" For figures of economic loss from native forest logging, state by state: Appendix 1: Economic analyses advising governments end native forest logging



¹⁵ Bagley, J.E. (2011) *Impacts of land cover change: energy regulation, breadbasket production, and precipitation*. Phd., Atmospheric and Oceanic Sciences, University of Winconsin-Madison.

¹⁶ The SFRMP has a legislated advisory function and mechanism to consult between the Minister for Agriculture, Fisheries and Forestry, through the co-chairs and stakeholders in the forest and wood products industry –

¹⁷ <u>Access to Australian Parliament House by Lobbyists</u>

Our forests' survival depends on how we equip them to withstand the entwined biodiversity and climate crises. Despite this being vital for survival of people and wild creatures of this continent most citizens don't even know there is a National Forest Policy, let alone it is to be reviewed. This seems scandalous given the extent of public conviction that NF Logging ends.



8. Science must be the foundation of a NFP review

If allowed to recover native forests will draw down/store excessive atmospheric carbon. The world's most carbon dense intact forests are in S.E Australia: their 'total biomass carbon density, being 1,867 tonnes carbon per ha.'¹⁸ Appendix 1: Carbon Sequestration and Storage

As native forests are the repository and (often last) essential life giving habitat for critically endangered Australian biodiversity their immediate protection, restoration and reconnection (of fragments) must occur, for catchment and soil protection, for survival of ecosystems and interactions across those ecosystems, to allow continued flow of life across this continent. This is what is at stake.

For three decades the scientific basis of the current NFP has been ignored

As a *specific objective* the current (unheeded) NFP stated: 'There should be a sound scientific basis for sustainable forest management and efficient resource use.' ¹⁹ Regarding conservation it articulates: 'Two of the principal objectives of this Statement are the maintenance of an extensive and permanent native forest estate in Australia and the protection of nature conservation values in forests'²⁰

The conservation values of an extensive, permanent native forest estate *have not* been maintained because of the failure to heed science. Failure to heed specific objective 4 of the current NFP: 'that science guide forest management' has brought us to this parlous situation below. Appendix 3: Historical Damage to Australian Forests and Appendix 2: Scientist Statements.

¹⁸¹⁸ (living plus dead) biomass, *Re-evaluation of forest biomass carbon stocks,* Heather Keith, Brendan G. Mackey, and David B. Lindenmayer

¹⁹ (NFP, 1992, Section 4: Specific Objectives)

²⁰ NFP, 1992, Section 4.1 Conservation)



LIDAR imagery shows extent of loss of intact native forest and amount degraded by 2016

- Mt Ash forests in Victoria experiencing ecosystem collapse; others at risk of such from intensive logging.
- Australia was already leading the world leader in mammal extinction, directly killing aboreal and other mammalian species with heavy logging machinery, or indirectly with habitat loss from logging – canopy, and understorey destruction: lack of food, shelter, breeding places, pathogen spread. Appendix 1: Logging Native Forest Impact: Biodiversity, Direct and Indirect Death from Logging
- A continent with an exponentially increasing extinction rate, at the epicentre of the 6th greatest, but first man made extinction crises, its logging and clearing being one of 6 main factors.

The image below from NASA's Firms mapping: <u>(Fire Information for Resource Management System)</u> shows how much of Australia was burnt in the 2019-20 fires, as of the week of January 2020

Yet, given the little left as of 2016 and the much less left after the fires burnt <u>97,000 sq. km across</u> southern and eastern Australia, native forest logging was allowed to continue



Now:

- 100 Australian endemic species are extinct (or extinct in the wild) since European colonization, representing approximately 10 percent of the world's post-1500 recognised extinctions. The actual number of extinctions is likely to be far more than those recognised in formal lists (Woinarski et al 2019).
- In NSW it's more than half native forests now lost. Approximately half a million hectares degraded by logging since 2000 alone.
- 244 threatened species being further endangered by logging
- Forests across Australia are undergoing **climate change induced tree death**, made more vulnerable by logging to exposure from canopy loss and soil desiccation

Appendix 3: Historical damage to Australian forests. See Choat Laboratory's 'Dead Tree Detective' site.

Native Forest Logging and routine hazard reduction clearing and burning are exacerbating fire severity and scale. Industrial scale logging is creating same aged stands of matchstick like forest regrowth. Lacking established canopy regrowth native forests desiccate easily creating vast flammable tracts of landscape. They lack the cooling, protective characteristics of mature unlogged forest. To ameliorate Australia's fire threat the Federal government needs to protect and restore all native forests and protect those in recovering protective canopies.

Appendix 1: Logging and Bushfire Danger, effects of NF Logging on forest flammability, hazard reduction clearing and burning

Trees within forests suddenly dying. Within forests Eucalypt species are now dying from climate change induced drought, experiencing hydraulic system failure from a lack of soil moisture. With

percentage losses (tree deaths) of up to 13% of canopy documented, the further exacerbating impact of ongoing non selective logging can only hasten and/or guarantee forest ecosystem collapse. The most drought adapted genus in the world, eucalypts, unable to withstand the intensity of impact from prolonged periods without rain leading to soil moisture decline resulting in tree dehydration are being put further at risk by ongoing logging and desiccation of forests. Professor Brendan Choat of the Hawkesbury Institute for Environment has been monitoring tree death across NSW since the 2019 drought and subsequent fires and floods. More recent intensely dry months in the late Spring and early Summer of 2023 saw more native forest tree deaths from hydraulic system failure. **Appendix 3: Historical Damage to Australian Forests: Global Tree Death from Climate Change**

9. Concluding Comments

Since the 1992 National Forest Policy (NFP) three decades of science reveals the intricacies of the ecological processes, and the carbon carrying capacity of Australia's native forests. Interacting crises, biodiversity collapse and run away climate change, each exacerbating the other, threaten life forms on the planet.

Your role as leader is to steer an emergency response, to put the safety of the people and the lifeforms for which you are responsible, first. You need to heed *the consensus of brilliant, hardworking and brave Australian scientists, and their international counterparts, that Australian, but not only Australian, native forest ecosystems are now so diminished, fragmented and ecologically vulnerable that they must all – immediately – be protected and restored.*

AFCA is aware of your previous and recently re-affirmed support for ongoing native forest logging. We understand the party you lead addresses social justice from an economic perspective and that you are subjected to industry claims that NF Logging is important to regional economies. We dispute this, arguing that protection and restoration of native forests now will provide greater economic benefit for longer than ongoing resource depletion with its multiple and far reaching negative consequences: climate change exacerbation, landscape fire traps, invertebrate depletion, and agricultural vulnerability. We ask you to reassess your support for NF Logging in the light of the science which is unequivocal.²¹

If the logging lobby prevails NF Logging will continue not just for its biomass, but as 'currency' for emission 'laundering', i.e. carbon offset trading, now utterly discredited as a mechanism for achieving emission reduction in reality – as opposed to flawed carbon accounting models. **Appendix 4:**

Australian Carbon Credit Units must not become a bargaining chip in the imperative to cease NF Logging. We have set out in Appendix 3 the fact that Australian eucalypts are already dying from climate change induced drought. Each event is weakening, killing native forests. Do you not think it

²¹ Appendix 2: Scientists' Statements

would be better to leave forests alone, not log or degrade them further, nor allow them to be traded to facilitate ongoing emissions that are already beginning to kill them?

Here is not the place to detail the positive alternative economic Proforestation alternative but we would be happy to provide information regarding its immense economic, social, climate and biodiversity benefits. See **Appendix 1: Carbon Sequestration and Storage for the immediate immense climate benefit.**

We ask you to lay aside the real, difficult, but nevertheless distracting claims of politics - and allow this NFP to be guided by science so that our native forests have a chance to survive.

Please do not allow a no longer economic, irresponsible native logging industry to add to the pressure native forest ecosystems are already under by allowing them to be logged, thinned or traded. Protection and restoration can provide a chance to survive the onslaught climate change is bringing, with exponential intensity.

When NF Logging and clearing ends, the scientific, environmental and a host of other sectors of the Australian community will unite to restore nature with all the benefits that will bestow.

Yours sincerely,



On behalf of AFCA