Public submission

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Submission to the Independent Forestry Panel Consultation on the Future of the Native Forest Timber Industry which will contribute to the Forestry Industry Action Plan of the NSW Government Closing Date: 13 October 2024



To: Independent Forestry Panel Secretariat:

This Submission, from a group committed to the preservation of our crucial environment, details many reasons why logging of native forest timber in NSW forests must cease now and the NSW Forestry Corporation revert to 100% reliance on plantation-based timber. There is ample evidence that public native forests across NSW are being intensively logged, with the removal of trees which provide critical habitat for threatened forest dependent wildlife.

Reasons why logging of NSW public native forests must stop NOW:

- Over allocation of timber in the Wood Supply Agreements. •
- Over estimations of available timber by Forestry Corporation NSW. •
- Annual multimillion dollar losses sustained plus similar subsidies from public purse.
- Growing intensification of logging, seemingly with great urgency in the face of new legislation. •
- Weakening of environmental protections which protect habitat of endangered species.
- Declining forest ecosystem health and sustainability.
- Worsening status of several forest-dependent threatened species. •

Currently 91% of our timber already comes from plantations. There is enough available plantation timber and new non timber building products to cover the 9% coming from native forests, if native forest logging stopped.

Planning the Great Koala National Park

It is reported that the government appointed Community Advisory Panel met recently for its 7th meeting to discuss progress on GKNP assessment and planning. Initial advice was that the park boundaries would be finalised by the end of this year, but that is looking increasingly unlikely, as various reports are still yet to be presented to the 3 Advisory Panels for feedback.

The government has conducted the biggest thermal drone survey work ever undertaken in NSW. Covering over 170 plots across the 176,000 ha GKNP assessment area. The draft report estimates the koala population in the assessment area to be 12,111 koalas. The draft analysis of koala populations will now be peer-reviewed. The economic analysis is still underway with no timeline for completion available. We expect that this submission and others will be considered by the Community Advisory Panel prior to the decision on park boundaries.

Meanwhile the industry Advisory Panel has come up with its own GKNP proposal covering 80,000ha. We believe that this last-minute attempt to scale back the park has not been shown to the Community Advisory Panel nor the Aboriginal Advisory Panel. It may include areas of least value to the timber industry.

Background

• It is critical that any decisions about the future of forestry in NSW clearly distinguish between those State Forests, or portions of State Forests, that contain plantations and those that contain native forests. The NSW Forestry Corporation and forestry organisations both have a history of obscuring this critical difference to hide financial losses in native forestry operations and to give the false impression that removing logging from public native forests would end access to wood products for construction and other essential industries. /2 • We support the NSW expansion of the plantation industry. Plantation timbers already provide more than 90% of the wood used in the building and allied industries. Plantation timbers, softwood and hardwood, have the capacity to fulfil all sustainable uses for wood products.

• New plantations should only be established on degraded lands rather than through the clearance of currently intact native forests. Ther are many such possible locations available to the industry.

• All natural habitats and landscapes, including the NSW forest estate, must be managed to ensure that they continue to deliver essential ecosystem services (air and water), maximise the protection of biodiversity and provide opportunities for sustainable recreational activities.

• Permanent protection and ongoing management as National Park or another reserve category of under the National Parks and Wildlife Act is the most appropriate framework for the ongoing management of our public native forests.

Responses to focus questions which have been provided to guide submissions

1. Sustainability of current and future forestry operations in NSW

• The most recent surveys have shown that current forestry operations in areas of native forests are making a significant contribution to escalating rates of habitat and species loss in NSW.

• Moreover, forestry practices cause unnecessary and damaging disturbance to forest ecosystems. Forestry activities go far beyond the removal of vegetation, and include roading, modification of water courses and exposure and disruption of soil structure. The adverse environmental impacts of these activities range from habitat loss, reduced water quality, landscape scale habitat fragmentation, the introduction of pests and weeds to reduced capacity for carbon sequestration and storage. None of these adverse impacts can be consider 'sustainable'.

• The only viable option for a sustainable forestry industry is one based solely on plantations. All forms of forestry activities should stop in public native forests.

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

• The decline of a multitude of forest dependant species, including threatened species such as Koala, Greater Glider and Yellow-bellied Glider, can be attributed to past and current forestry practices. Even if future practices are improved in relation to their habitat, they inevitably involve the modification or destruction of the existing forest habitat, an outcome we cannot afford.

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

• The vast majority of wood products can be sourced from plantations, including for uses where hardwoods are preferred. Continued access to relatively cheap hardwood products is no justification for the loss of native forests, especially as alternatives products are already available for challenging applications such as wharfing, power poles and propping.

• The low level of demand for boutique purposes such as fixtures, furniture and veneers can be met through recycling and appropriately stocked plantations.

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

• Our preference is that no logging be permitted in any native forests, regardless of tenure.

• We strongly support a transition to complete reliance on softwood and hardwood plantations for the supply of wood products in NSW. We also support the expansion of the plantation sector provided that new plantations are established on previously degraded lands rather than by clearing native vegetation. /3

5. The role of State Forests in maximising the delivery of a range of environmental, economic and social outcomes and options for diverse management, including Aboriginal forest management models

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

• Areas of State Forests that contain legitimately established plantations should be retained as State Forests under the management of the Department of Primary Industries.

• The major and repeated breaches of environment regulations by the current NSW Forestry Corporation model demonstrates that it provides a totally unacceptable model for administering these public assets.

• All State Forests that contain native forests should be gazetted as National Park, Nature Reserve, State Conservation Area or Regional Park under the National Parks and Wildlife Act.

• We support these reserves being formally declared for Aboriginal joint management under the relevant provisions of the National Parks and Wildlife Act.

6. Opportunities to realise carbon and biodiversity benefits and support carbon and biodiversity markets, and mitigate and adapt to climate change risks, including the greenhouse gas emission impacts of different uses of forests and assessment of climate change risks to forests.

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

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

An update from monitoring teams of current logging in the GKNP assessment area reports:

The proposed GKNP covers approximately 20% of the NSW north east forestry region and yet over 45% of logging in the region is occurring within the proposed park area. NSW Forestry Corporation, with the NSW government's endorsement, is clearly targeting the GKNP as a last frantic grab before the park is declared. They are targetting the best of what's left, which is exactly where the koalas live.

Recently, within the GKNP, there were 13 active logging operations, 15 paused operations, 12 operations planned to start within 6 months and a further 15 planned for within 6-18 months. This devastating situation continues despite ongoing community opposition and on-ground direct actions. The government has refused to stop the logging, they have refused to scale back the level of logging to pre GKNP announcement levels and they have refused to apply any improved koala protection measures in logging areas. The reality is that our poor koalas are worse off now than they were before Labor was elected and made the promise to create a GKNP!

Please accept this Submission as a plea for greater consideration of the urgent need to protect the irreplaceable forests of NSW.

Dong Hewitt AM

Signed on behalf of Christians for Peace Newcastle