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Submission ID: 204335

Organisation:	N/A
Location:	New South Wales
Supporting materials uploaded:	N/A

Submission date: 10/12/2024 8:21:45 AM

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

Logging public native forests, the forests we all own, is not sustainable and has not been sustainable for scores of years.

The days of foresters walking into logging compartments with chainsaws are long gone. A staff of three in massive mechanical harvesters can clear hectares of forest in a day.

There is a strong case to make that native forest logging has not been sustainable for over a hundred years, since tree fellers had to labour with axes and cross cut saws (perched on spring boards cut into the base of trees), transporting the logs out of the forests with bullock teams. And nobody is presently logging red cedar commercially (Toona ciliata, formerly known as Toona australis). According to the Kiama Library the cedar getters over cut this species (by hand) over a 40 year period on the south coast up until the 1850s. It is now commercially extinct.

This would be the first rebuttal of the simplistic statement by logging entities that "the trees grow back."

If you watch the road to the Eden chip mill, as conservationists regularly do and register a truck count, there are scores of logging trucks, delivering over a thousand logs, every working day. The regular and serious breaches by Forestry Corporation are significant.

An expert in regulation Graeme Samuel said there was an ‘ingrained culture of non-compliance’ while a 2024 Land and Environment Court judgment stated that FCNSW ‘has a pattern of environmental offending’. (Breaches, M. Pepper, 2024)

One only has to look at the area designated for the Great Koala National Park and see the speed at which contractors are extracting logs to degrade the values of the proposed reserve. It's outrageous.

Native forest logging on public land should be phased out as it has been in Victoria and Western Australia.

FCNSW should have nothing to do with native forests and only have responsibilities for softwood plantation harvesting / planting. This is a proper industry, commercially viable, profitable, producing value added products that meet the needs of the construction industry.

NSW Auditor-General, studying native forest logging, concluded last century that Forestry is cutting down trees faster than they are growing.

The Natural Resources Commission came to the conclusion that state forests couldn't continue to protect the environmental vales AND supply the current quota stated in the wood supply agreement. What happened? The logging rules, the IFOA, got changed in the logger's favour and stream bed reserves, where some of the most moist soils are found and therefore the largest trees, were now available for logging.

Wood Supply Agreements and Regional Forest Agreements are routinely rubber stamped, not properly assessed at the required intervals, even after twenty years. The original RFA, drafted before climate change impacts had any real consideration in government budgets and plans, are completely out of date. The increase in threatened species means that the RFA exemptions for forest management should also be reviewed.

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Little attention is paid to the slow growth of trees on dry ridge tops (often where trees are logged for ease of road access)

An old sleeper cutter, working on our property in the 80s said, 'David, you don't have enormous trees on your property but you would be surprised how old these larger trees are. They are very slow growing on these dry, bony soils.'

Some species, like the south coast preferred koala feed tree, *Eucalyptus longifolia*, are very slow growing. So are ironbarks. You can see this on our property where young trees under a metre in height are basically little taller after 30 years. Surviving but not growing with vigour.

But before the panel endorse the simplistic 'trees grow back,' conclusion also consider this:

The regeneration of forest post logging is very patchy,

The massive impact of the mega fires of 2019/20 on wildlife and wood supply,

The current and future impacts of climate change.

The widespread consensus is that industrial scale logging has made our forests younger, removing older, larger trees.

Younger forests provide fewer hollows for shelter and breeding,

Younger forests provide less nectar and seed,

Younger forests deliver less water in catchments

Younger forests are more fire prone.

The public native forest logging industry is not sustainable because areas that are logged and later grow back as even aged trees are more flammable, contributing significantly to fire risks (Lindenmayer and Zylstra 2024).

I have been a volunteer firefighter with the RFS for over 20 years.

The Currawan Fire started in logging slash (ie. debris left after logging).

While working with a strike team in the Nelligen area in 2019 our RFS maps of the Batemans Bay area had a "Safety Note: High fuels loads-forestry slash."

So contrary to the deputy Premier at the time and many radio commentators who thought (without evidence) that more logging meant more roads and access for fire trucks, and therefore enhanced fire mitigation, the opposite is true.

More logging and roading means more disturbance, more drying out of the bush and higher fuel loads. Forest left to mature will self thin and be moister, being more fire resistant. Firefighters witness the fire resistance of mature forests routinely during fire events and hazard reduction operations.

With a changing climate, the incidents of more severe fires means that native forest logging becomes even less viable than it is now.

So public native forest logging is not sustainable and will not be sustainable into the future.

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

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I am a wildlife photographer & Independent filmmaker.

I have exhibited in Wildlife Photographer of the Year, the world's oldest, largest and most prestigious competition / exhibition as well as the Nature Photographer of the Year.

Our rural property, completely covered by forest / woodland, has a Voluntary Conservation Agreement. I have lived and recorded in my own forest for over 30 years. As a citizen scientist, through my own observations, I have developed a range of skills and understandings.

Many of our iconic species are largely nocturnal so I have walked, photographed and videoed the Australian bush at night, weeks at a time, for decades, recording threatened species including owls and gliders.

I have conducted surveys on a professional basis

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My work has been published/purchased by the Natural History Museum, London, The Australian Museum and various conservation NGOs. I have been contracted by various government conservation departments.

I produced a documentary film on the campaigns to reserve the South East Forests. In UNDERSTOREY (2016) we explored the theme: "How do you value a forest? The forest we all own." The film recorded accounts from local people, scientists, farmers, teachers, about their concerns for the water catchments in the Tantawangalo Forest and beyond.

During the campaign there was much dialogue with foresters.

Concerns of conservationists last century were discounted. The public were reassured by the logging interests with the generalisation, 'The trees grow back.' In other words, nothing to see here, move on

Eucalyptus seiberi (silver top ash), is preferred by the wood chip mill. It's fast growing and good for paper pulp. When we put it to professional foresters that there was a dominant emergence of seiberi post logging, they denied that the south coast forests were changing, becoming less diverse.

They don't deny it today.

Logging can cause changes in plant communities by directly removing species (Keenan & Kimmins 1993; Felton et al. 2010) ,

Eucalyptus sieberi responds particularly well to disturbance (Bridges 1983; Raison et al. 1983, Boland et al. 2006).

The EPA has had to issue numerous stop work orders in state forests such as Tallaganda for FCNSW.

State Forests managed to find hardly any greater glider den trees in several logging compartments. It then emerged that surveys were being conducted for a nocturnal species during the day time. The public were incredulous but the environment movement, as a whole, were not surprised.

This added to the stories of non-existent 'researchers' and non-existent 'research' supposedly conducted in the past.

The lack of ethics across the logging entities Australia wide, has seen logging on steep slopes, on land that was not even forestry land and private detectives paid to gather incriminating evidence on prominent environmentalists.

Citizen scientists found two den trees in Tallaganda State Forest in less than an hour. I recorded greater gliders emerging from their hollows with infrared cameras and lights.

A desktop audit by South East Forest Rescue later found that FCNSW were largely not complying with a later EPA requirement that survey for gliders be made within an hour of sunset, when gliders would be coming out of their dens.

Forestry Corporation, and its earlier form, the Forestry Commission, have routinely not acted in the public's interest, or in the interest of the environment, but as largely logging brokers, acting mostly in the interest of contractors.

There are skilled people within FCNSW, but the leadership and overall culture gives no confidence that the environmental and cultural interests of our public native forests will be properly protected into the future.

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

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The entities involved in native forest logging: the NSWFC, contractors and various associations, continually collate both hardwood and softwood jobs. They are not separated as they would show how few jobs are actually now involved in native hardwood logging. This is not transparent.

Frontier Economics put a figure of 332 for south coast forestry jobs.

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The other gross misrepresentation that is frequently raised in support of native forest logging is the need to supply timber for housing.

Housing is a pressing problem that rightly is of strong concern to most people.

To conflate housing and native hardwood logging is simply dishonest. Less than 5% of hardwood from public native forests goes into housing, usually in flooring.

The vast majority on the south coast goes down to the chip mill. The rest is mainly firewood.

There are viable alternatives for the use of hardwood in construction, mining, transport and retail.

Anyone seeing the condition of wooden pallets full of nails in an often vain attempt to keep the structure together would know that plastic pallets, especially for lighter loads, are more durable and hygienic.

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#### **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 vast majority of our forest products are already sourced from plantations the government should be supporting this activity, a true industry with value added products.

This should not be supported through any more clearing of native hardwood forests, but rather through careful selection of land that is also not prime agricultural land.

As Land Services is the responsible entity for supervising Private Native Forestry, it is vital that LS is sufficiently staffed so that proper supervision of logging takes place. That is, habitat trees are not removed, logging doesn't take place on steep slopes or next to stream beds.

Anecdotal evidence is widespread of logging taking place on private property without the knowledge of neighbours.

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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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Native forest logging has little social licence in a survey conducted by the industry. This is true for both regional and metropolitan areas.

If the native forest logging "industry" was sustainable, ask yourself, why would government agencies such as the NRC and Auditor-General make public statements that the environmental outcomes could not be protected and that trees were being cut down faster than they could grow?

Wood Supply Agreements and Regional Forest Agreements are routinely rubber stamped, not properly assessed even after twenty years.

Even after the mega fires, it was pretty much business as usual. Many roadside trees were felled, even in national parks. This was supposed to "make safe" the roads. There was evidence that many sound trees were also felled in reserves.

There were more infractions from FCNSW when contractors felled large trees and numerous trees with valuable hollows (against EPA guidelines when so many arboreal mammals had lost their homes in the mega fires).

Many of the hardwood jobs are transferable to softwood harvesting and transporting, as happened after 2020 when the pine plantations, badly affected by fire, had to be harvested before the plantations succumbed to fungal attack. Other jobs in support of national park reserves, fire mitigation and feral pest control would be readily applicable.

**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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Native forest logging on public land should be phased out, as it has been in Victoria and Western Australia, without reference to commercialisation of carbon. The underlying benefits for the community are cleaner air, healthier soils, enhanced water catchments, (in time) less fire prone forests, greater biodiversity, storage of carbon and climate refugia. These benefits are real, not abstract, and should be accounted for but not commercialised.

The roting of offsets and carbon credits makes the public wary of going down this path. Meanwhile, as the Government ponders this carbon mechanism, the delay in the Great Koala National Park gazetting means that the potential park assets, the trees meant to protect the well being and very existence of the koala, are getting felled in great numbers.

This cynical exercise by Forestry is akin to the treatment of the Coolangubra Forest last century when conservationists were advocating for the reservation of this wilderness area with high environmental values. Forestry bulldozed the Wog Way road through the heart of the forest so then, technically, it could not be classified as a wilderness. The Coolangubra had some of the highest densities of arboreal mammals globally.

Today, because of its geographical location, these south coast forests have been identified as vital refugia for threatened species such as greater gliders (that are heat sensitive), as the climate continues to warm and impact wildlife.

Continuing to log in native forests, compounds the impacts of climate change.

Preserving native forests is the cheapest form of climate change. At the stroke of a pen, governments could meet our 2030 targets through the retention of native forests, including those ones degraded by logging by allowing them to be restored over the next several generations.

The historical government handouts could then be applied to:

- proper supervision (through increased staffing) by land services for private forestry,
- effective fire mitigation, forest restoration and feral animal control,
- maintenance of visitor infrastructure such as lookouts and bridges.