Public submission

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

Native forest logging is not sustainable by any stretch of the imagination both economically and ecologically speaking. Most shockingly, the native forest logging industry runs at an immense loss despite enormous subsidies from the government to prop up this flailing industry. Despite the Forestry Corporation of NSW receiving a whopping \$246.9 million in grants, the hardwood native forest logging division still managed to run at a loss of nearly \$30 million in the two years between 2020-2022. It is unfathomable that any enterprise running at such a loss should be allowed to continue operating. Particularly when the costs continue to rack up owing to the criminal court cases and fines for illegal logging operations with penalties reaching more than \$1.1 million for more than a dozen instances of unlawful activity in fewer than five years, including seven criminal convictions - also sponsored by the unwitting taxpayer.

It is clearly apparent that the economical costs are unsustainable but even more crucial to this debate is that native forest logging is ecologically most unsustainable. Our native forests are priceless. They have taken millenia to establish and cannot ever return to their former state once they have been logged - this is largely due to the introduction of invasive flora species which take over the landscape as well as impacts of climate change such as high-severity fire. Logging native forests removes old-growth, hollow-bearing trees which have taken hundreds of years to form, particularly those large enough to support fauna species like the endangered Greater Glider, Powerful Owl and Glossy Black Cockatoo, and without which, cannot breed and their species shall be condemned to extinction. The diversity of trees available to species such as the endangered Koala is also critically important for feeding, resting and shelter, particularly in extreme weather conditions of which we are seen more and more. There are also many endangered migratory species such as the Swift Parrot and Regent Honeyeater (which both currently have governmentfunded recovery programs) that depend on the blossoms of mature eucalyptus species to survive. The long-term survival prospects of our endangered species hangs on a knife-edge and the ending of native forest logging is a key aspect to ensuring they have a sustainable future. The fact that the current Regional Forestry Agreements (RFAs) allow the Forestry industry to bypass Federal biodiversity assessments shows that our endangered species are not being taken into account and decisions being made at both state and federal level are not founded on the latest scientific knowledge on climate and the state of our forest ecosystems. These deals with Forestry are essentially allowing industrial logging of public forests with full exemption from Commonwealth environment law.

Not only have the 2019/20 fires made this situation much more urgent and serious but it has also highlighted the dangers that logging creates and how it can exacerbate the already increasing risk of high-severity fire. Logging disrupts the humid micro-climates of forests, cloud formation and rainfall. The destruction of the canopy also dries out the forest floor and the thinning of forests create wind-tunnels. These factors combined make for forests much more flammable than those left in-tact.

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

At this critical time when we are facing the dual climate and biodiversity extinction crises, it is imperative that citizens, government and industry alike work to protect and preserve habitat. New research (Ward et al. 2023) shows that NSW has lost forests and woodlands equivalent in area to the landmass of New Zealand since colonisation - approximately 29 million hectares. Of the 25 million hectares of forest and woodland that remains in NSW, 9 million hectares is degraded. Only 16 million hectares (30% of pre-European colonisation forest and woodland) is intact. There are 244 threatened species, already affected by historical deforestation and degradation, that continue to have their habitat logged in NSW. Of these 244, 25 are listed as Critically Endangered, 79 as Endangered, and 140 as Vulnerable. Seventy threatened species impacted by continued logging, now have 50%, or less, of their habitat remaining. The NSW Labor Government made an election promise to create the Great Koala National Park to

protect the rich environmental and cultural heritage of the mid-north coast. It is unfathomable that rather than placing a moratorium on logging whilst area assessments are made, the region has been intensively targeted for native logging with operations increasing to be four times greater within its boundaries than anywhere else in NSW. Over 18,800 hectares of core koala habitat is currently being logged or is scheduled for logging. The heart of the Great Koala National Park will be ripped out before its implementation.

The cultural heritage in the area of the proposed Great Koala National Park is also highly significant. Gumbaynggirr Man, Mr Michael Donovan's statement to the NSW Upper House Inquiry into Koala Populations and Habitat.

Coffs Harbour, NSW, 4 Feb 2020:

'Dunggiirr (Koala) are very sacred to our People, Culture, and to the landscape of the Gumbaynggirr Nation itself. The Knowledge of Dunggiirr has played a vital role in Gumbaynggirr Creation Stories, Laws & Customs, Spirituality, core values, and our identity.

They have survived alongside our People for countless generations through many climate changes, catastrophes, cataclysms and extreme Earth transformations. Despite their population decline due to intensive logging, land clearing, and the recent damaging fires, the colony within the Gumbaynggirr Nation are now the most significant.'

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

As a structural component in housing construction, hardwood has long been replaced by LVL (laminated veneer lumber) and glulam (glued laminated timber) made from plantation softwood. Native timber has long been out of use for transport such as railways with sleepers being replaced with concrete. Power-poles too are now being made from fibre composite products which are strong, long-lasting, corrosion and fire resistant and lighter than hardwood.

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

The future of the forestry industry in NSW is in plantations. It is unspeakable to be burdening taxpayers with ever-increasing costs to destroy priceless native forest estates for waste products such as woodchip, paper pulp, pallets, even tomato stakes. Currently only a very small percentage of native hardwood is used for construction of any kind with the majority of sawn timber (around 90%) instead coming from plantations. The remaining 10% can easily be satisfied by stopping the export of unprocessed plantation wood and improving the domestic management of existing plantations.

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

New Zealand ended native forest logging 22 years ago and NZ Forestry now relies solely on a plantation-based industry with exports worth about \$6 billion a year. The New Zealand Department of Primary Industries states on their website 'The importance of forests to New Zealand goes well beyond commercial timber production. New Zealand's forests have spiritual, social, cultural, environmental, and economic importance.'

New South Wales stands to gain greatly economically and socially. A report by Frontier Economics has also shown us that the transition to 100% plantations could cost as little as \$30 million per year over ten years - approximately the same sum as what Forestry is currently losing whilst taking along with it priceless, irreplaceable native forest.

The true value of our forests is not in forestry but in their critical role in carbon storage, the water cycle, reducing fire risk, recreation, spiritual connection and providing critical habitat for an abundant biodiversity. It is imperative for our native species that their habitats remain intact just as it is important for the local community to be employed. Both of these can be achieved through transition support with jobs created for the management of protected forest areas, recreation and tourism, plantation-based forestry work, fire and invasive species management. Regarding Aboriginal forestry management models, this excerpt from an article strikes me as critical. 'Many First Nations have identified ways to restore and manage their respective Countries through land rights, self-determination and Cultural practices. Industrial forestry has extensively degraded forests and endangered many species of animals. Continued logging will only make these problems worse. On this basis, we strongly believe there are better ways to assert sovereignty on Country than logging (even when it is misleadingly labelled Forest Gardening). First Nations people need to be on Country, to reclaim Custodianship and restore forests where they have been degraded by past exploitation, control feral animals, conduct fire management, and reinstate cultural and ecosystem resilience. These are more closely aligned with healing and looking after Country. Such Traditional Custodianship would enjoy much stronger public support than continued logging.' (Gary Murray, Jim Everett-puralia meenamatta, Chris Taylor and David Lindenmayer, 2023)

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

Native forests are absolutely priceless and irreplaceable. Their value cannot be measured in digits or currency by accountants and profit-greedy exploiters but by the life they sustain. Australia is described as 'megadiverse' because over 80% of Australia's plant, mammal, frog and reptile species occur nowhere else in the world. However, Australia also holds the shockingly sad title of 'highest mammalian extinction rate in the world'. One hundred Australian endemic species are listed as extinct (or extinct in the wild) since the nation's colonisation by Europeans in 1788. The list includes 38 plants, 34 mammals, 10 invertebrates, 9 birds, 4 frogs, 3 reptiles, 1 fish, and a protist. Furthermore 86 of our native flora and fauna species are now critically endangered and under real threat of extinction with deforestation being a driving cause. As is stated on the NSW Government's own Biodiversity Conservation Trust webpage (https://www.bct.nsw.gov.au/what-biodiversity-and-why-it-important) 'Biodiversity is fundamentally important. It is considered by many to have intrinsic value: each species has a value and a right to exist, whether or not it is known to have value to humans. The undoubtable Albert Einstein once said, 'Our task must be to

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free ourselves by widening our circle of compassion to embrace all living creatures and the whole of nature in its beauty.'

All species, including humans, rely on many other species to live. Many of us were taught about the web of life at school. We need varieties of healthy and well-functioning ecosystems to support the life of all species, including humans.'

Native forests are a vital part of the life support system on Earth. In NSW they are biodiversity strongholds, they provide clean water, breathable air and as carbon stores, are essential in our defence against the worst impacts of climate change, making them of critical importance to all people in NSW. Undisturbed and mature forests are more resistant to the effects of fire, store more carbon than forests that have been logged and regrown and provide habitat to forest dependent species.

It is unconscionable to further delay an end to native forest logging in seeking to monetise forests so carbon and biodiversity markets can be explored; particularly considering that the carbon released when cutting down and processing trees would undercut any climate benefits of the carbon credits plan.

A just transition and industry adjustment has been independently costed at \$30.2 million per year over the next ten years. This would be leveraged to transition to 100% sustainable plantations which would be hugely profitable, create jobs and preserve our native forests to slow down climate change and preserve native biodiversity.

The opportunity to realise and action this critically important vision, through the ending of native forest logging, is now.