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

We must stop any further native forest logging immediately. The long term damage caused by the practices of native forest logging has been extensive, and so much harm has happened that no matter what the logging approach now, it is completely unsustainable. It is too late for approaches such as Variable Retention Harvesting (Lindemayer, 2024, Chapter 4). Our climate, biodiversity and even economics have already sustained major permanent harm. Our focus needs to be on retention of what is left, and major rehabilitation, and government funding to do so. This focus is for the benefit of all Australians.

The process of logging itself generates considerable amounts of carbon, adding to our climate crisis. Forests that are left intact store a great deal more carbon than forests that are logged and left to regrow (Moonmaw & Law, 2023).

The most egregious harm is being done to biodiversity. With the Regional Forest Agreements, the loggers in NSW State Forests do not need to notice or care for endangered wildlife or plants. Each day areas of habitat are lost to our magnificent wildlife. Too many of our endangered koalas (*Phascolarctos cinereus*) are left homeless in NSW in many locations, wander out onto roads and are killed. There has been 5 recently killed in the Coffs Harbour region. As another example, the critically endangered Scrub Turpentine (*Rhodamnia rubescens*) is trying to re-establish itself in the closed Little Newry Forest, but it will be cleared to make way for the logging trucks.

The financial loss to the taxpayer is unacceptable. Forestry Corporation has been subsidised annually to the tune of millions of dollars (estimated \$249 million in 2019-2020) and still makes a huge loss each year (estimated \$28 million in 2019-2020) (Frontier Economics, 2023). There is no deterrent for the removal of large older trees or damage to other trees with big machinery. When breaches are found, the taxpayer pays, not those who commit the act or their managers.

The Uniting Church recently launched a book called ‘Breaches’ which has reported Forestry Corporation’s contractors’ illegal behaviour in 8 NSW State forests. These breaches were prosecuted by the Environment Protection Agency and I believe there have been many more across NSW not prosecuted. ‘These breaches include failing to abide by post-bushfire conditions that were intended to help surviving wildlife to recover, logging in prohibited areas, and felling hollow-bearing and giant trees.’ (Uniting Church Synod of NSW and ACT, 2024)

Every one of our remaining native forests needs to be protected. Wildlife such as our endangered Koala need a range of particular differing native trees for food and shelter and a large range of forest in which to roam seeking mates etc. Further, native trees need to be left to mature so they can develop and in the longer term, provide hollows for breeding and safety purposes for endangered wildlife for example the endangered Southern Greater Glider (*Petauroides Volans*). At this stage, 174 species in NSW compete for hollows for dens or nests.

Wildlife is at serious risk of death from intense bushfires. Native forest logging increases the risk of, and severity of, bushfires. Logging dries out the soil in a forest and new trees absorb a lot of water as they grow. The myth that logging making fires less likely is exposed as untrue in David Lindenmayer’s research, outlined in ‘The Forest Wars’ Chapter 4.

Mass tree removal on slopes (that is happening in several sections of the proposed Great Koala National Park), is causing considerable erosion. Water ways are being polluted, causing harm to creatures such as the Near Threatened Platypus (*Ornithorhynchus anatinus*).

Weeds easily establish when canopies are removed. Lantana has quickly established in many previously logged areas. Loss of native understory leads to loss of food for wildlife (such as the seeds of *Allocasuarinas* (Casuarinaceae) for the Vulnerable Glossy Black Cockatoos (*Calyptorhynchus lathami*)) and the establishment of die back from Bell Miners discouraging other birds.

Frontier Economics (2023). Public native forest logging: a large and growing taxpayer burden. Frontier Economics, Melbourne, Victoria.

Lindemayer, D, (2024). The Forest Wars, Allen & Unwin, Crows Nest, NSW.

Moomaw, W.R. & Law, B.E. (2023). A call to reduce the carbon costs of forest harvests, *Nature*, 620, Pages 44-5.

Uniting Church Synod of NSW and ACT (2024). New book profiles logging breaches by Forestry Corporation, Insights Magazine website <https://www.insights.uca.org.au/new-book-profiles-logging-breaches-by-forestry-corporation/>

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

Many unique and endangered species now depend on remnant native forest areas for their survival. For example, the Endangered Rufous Scrub-bird (*Atrichornis rufescens*), an ancient relic of a bird, one of the oldest descendants of the earliest song birds still in existence, now lives only in scattered areas in New South Wales and Southern Queensland, due to loss of habitat. Some of its current remnant habitat is in the Oakes and Roses Creek forests in NSW. These forests have both been recently scheduled for logging but luckily this logging has not proceeded as yet. The Rufous Scrub-bird was rated in 2014 as the 24th highest conservation priority amongst the birds of the world (Jetz, 2014).

The Rufous Scrub-bird is only one of many endangered species who live in our forests and are threatened by loss of habitat through logging.

Our climate is in trouble, meaning we are in trouble. In much of our coastal areas in NSW, our native forests are responsible for giving us oxygen, plus they cool our air and land. Our intact native forests generate rainfall, clean our streams, and provide water for our reservoirs. The removal of sections of our forest will impact all these features that are essential for our very existence.

The less that tall mature canopied forests exist, the worse our climate will be. We have already changed the landscape dramatically. It is crucial for our survival that we maintain what is left and work to increase rewilding of our land.

For thousands of years before 1788, our First Nations people cared for our landscape and continue to feel intimately connected to the land and the forests and the wildlife. So much has disappeared since 1788 and been changed forever. Sadly current logging practices destroy parts of the indigenous culture and spiritual connection to the land of their ancestors.

Jetz, W., Thomas, G.H. Joy, J.B., Redding, D.W., Hartmann, K. and Mooers, A.O. (2014). Global distribution and conservation of evolutionary distinctiveness in birds. *Current Biology* 24: 919-930.

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

There may be a demand for logging products but the situation has become so dire for our native species, the climate and hence ourselves, that we no longer can do what has always been done, i.e. just take what we like from what remains of our native forests, to satisfy the 'demand'.

The focus should be on developing genuine plantations on degraded land for timber use. Most of the wood for houses is apparently already being sourced from plantations.

When a compartment of native forest is clearfelled, a few large trees are removed for wood use, but much is left on the forest floor and burned. Our trees are turned into pallets or tomato stakes, or other low grade uses. Some is turned into woodchip and sent overseas. The damage far outweighs any benefit to mankind.

Alternatives are being found and we must continue to prioritise the finding of alternatives for whatever demand there is. Essential Energy has found alternatives to power poles made from our native wildlife habitats. We must recycle more paper and make paper products out of a resource that is not harming our biodiversity or climate.

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

Plantations for our log production need to be genuine plantations on degraded land, not from cleared native forests, whether public or private. Apparently 91% of Australia's log production is currently derived from plantations.

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

Unlogged State forests and forested National Parks offer:

1. rain, water and clean streams for wildlife in the waterways and for clean reservoirs for human use;
2. a major essential and easy carbon sink. Left alone they will aid to ward off climate disasters, saving mental health and money;
3. clean air, oxygen and forest bathing for mental health. As a clinical psychologist, working with people suffering from Depression, I often recommend walking in our native forests to improve mood and a sense of wellbeing;
4. far less financial harm to our economy. The NSW tax payer has paid a great deal of money in subsidies to Forestry Corporation which has been of no economic benefit in return. The future financial harm brought to us from climate change is incalculable.

It is outrageous that a government department be financially supported to destroy habitat and drive our precious wildlife to extinction.

Apparently since Victoria banned native forest logging, VicForests have advocated 'Cultural thinning' and 'Forest Gardening'. This practice suggests that forests are 'overgrown' and hence more flammable. This is not supported by empirical evidence and indeed thinning will increase fire risk and damage Country. It will also reduce moisture in the soil and shelter opportunities for our wildlife. I have witnessed thinning in a coastal area close to my home and since seen an absence of large lizards and a reduction in ground dwelling birdlife. Apparently First Nations people are divided on this proposal. (Murray, 2024)

Murray, G., J. Everett, C. Taylor, and D. B. Lindenmayer. 2024. Logging by another name , forest gardening. Perals and Irritations: September 6 2024.

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

Carbon offsets increase emissions if they lack integrity, and in 182 projects investigated by Andrew Macintosh and colleagues, and published by the CSIRO, they found 'limited evidence of regeneration in credited areas' (Macintosh et al, 2024).

To date, the research undertaken by Senior Lecturer, Megan Evans at the UNSW and her team have found that biodiversity offset schemes have the intended outcome of maintaining a 'declining trajectory' (Maron. 2015) and '...it is unclear how well threatened species are conserved within protected area networks..' (Watson, 2011). It is extraordinary that a habitat for a threatened species can be equated to a monetary figure.

As an example, a Southern Greater Glider habitat cannot be equated to a monetary figure. If someone deliberately, or even inadvertently, destroys a Southern Greater Glider habitat, that habitat is gone for over a hundred years, by which time the Glider will be extinct. In this case, habitats cannot be regenerated in time. In the Bongil Bongil National Park, there are no Southern Greater Gliders, as in times prior to establishment of the park, in 1995, the forest was logged. According to annual survey results of the Bongil Bongil National Park, Koalas are responding to being left alone and their numbers are slowly increasing there. But they are also being killed on the neighbouring highway as they need a greater protected area (the bridge of Pine Creek with Bindarri NP) in which to roam and find food.

Tragically NSW Forestry Corporation are at the present time logging or planning to log Southern Greater Glider habitat in 3 locations where the Gliders have been identified on the Mid North Coast.

Ending native forest logging in NSW completely would have a huge impact on carbon abatement as trees are the best carbon sequestrators we will ever have. Far too many PhDs in this country have been awarded to candidates researching carbon sequestration with little result and only very expensive options. Older larger trees store large amounts of carbon. Native forest logging releases this carbon, estimated as 3.6 million tonnes per year, especially if the residual is burned as biomass or on the forest floor. Soils are also depleted of carbon in this way. (Keith et al. 2014) It is well past time but we must end native forest logging, whether public or private, so as to allow previously logged forests to regain lost carbon, and allow what is left to continue to store carbon and provide valuable habitat. It is extremely important to follow the science. Governments must take responsibility for this, not allocate responsibility to private businesses, or allow companies to clearfell in exchange for saving other habitat that exists. We need both. This action would make a significant contribution to Australia's emissions targets and prevent biodiversity loss.

Keith, H., D. B. Lindenmayer, B. G. Mackey, D. Blair, L. Carter, L. McBurney, S. Okada, and T. Konishi Nagano. (2014). Managing temperate forests for carbon storage: impacts of logging versus forest protection on carbon stocks. *Ecosphere* 5(6):Art. 75. [online] <http://dx.doi.org/10.1890/ES1814-00051.00051>.

Macintosh A et al. (2024) Noncompliance and under-performance in Australian human-induced regeneration projects. *The Rangeland Journal* 46, RJ24024. doi:10.1071/RJ24024

Maron, .M, Bull, J.W., Evans, M.C., Gordon A., (2015) Locking in Loss: Baselines of decline in Australian biodiversity offset policies, *Biological Conservation*, 192, Pages 504-512

Watson, JEM, Evans, MC, Carwardine, J, Fuller RA, (2011) The capacity of Australia's protected-area system to represent threatened species, *Conservation Biology*, Volume 25, Issue 2, Pages 324-332, Blackwell Publishing