

Native forest harvesting on public land.

To: Clarence Valley Council, Biodiversity Advocatory Committee
Attn: Reece Luxton, Natural Resource Management & Projects Coordinator
Date: Friday 25 August 2023
From: Forestry Australia

Subject: Response to Call to Phase Out Native Forest Logging On Public Land
Motion from Biodiversity Advisory Committee

Who we are

Forestry Australia is an independent professional association of forest scientists, managers and growers who work in native forests, plantations and in the provision of environmental services across both public and private land. We acknowledge Traditional Owners, as Australia's 'first foresters' and their long-term custodianship of Country. Forestry Australia's approximately 1,200 members have extensive experience in forest and fire management through roles as land managers, employees of emergency service agencies, and as volunteer fire fighters.

Forestry is the science and craft of creating, managing, conserving, using and caring for forests, regardless of tenure. It is this perspective that we bring to this submission. Forestry professionals now work in the public and private sectors, including with Traditional Owner groups and in the management of parks and reserves. We advocate balanced land use that meets society's needs through ecologically sustainable management of forests, including for timber supply and biodiversity conservation, while addressing the fire and conservation issues arising from a changing climate.

Forestry Australia is committed to the principles of sustainable forest management and applying these principles to generate environmental, economic and social outcomes in all types of forests, on all tenures. This includes conservation of biodiversity, provision of sustainable and equitable livelihoods, and the management processes, systems and practices which translate these principles into sustainability outcomes. When we refer to forests, we are applying the definition applied through the Regional Forest Agreements (RFAs), which includes the land and forest environment within parks and reserves as well as the private and public land forest estate.

Introduction

With this submission, Forestry Australia addresses the forestry science, environmental, economic and community impacts and opportunities for native forest management in NSW. We frame this through a series of questions that we propose the Clarence Valley Council should seek to answer prior to forming any position regarding changes to management of public forests in NSW. This due diligence is required to ensure policies do not precipitate unintended negative consequences for forests and the communities who rely on them.

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In Australia, native forests and plantations are harvested and regenerated to provide forest products with multiple flow-on benefits and to meet a range of society's needs. On public land, this activity occurs on a relatively small, discrete and well-regulated area of forest, with the majority of forest areas formally or informally reserved for the protection of biodiversity, cultural, social and spiritual values. In the North-East RFA area 69% of native forests are in formal conservation reserves and a further 16% is protected through informal reserves in State forests¹. Sustainable forest harvesting is not deforestation, because of the key requirement to regenerate harvested areas. Deforestation occurs when forests are converted to other land uses. Compliance with legislation, regulations and Codes of Practice, the implementation of strategic and operational management plans, and independent third-party forest certification schemes all provide assurance that harvesting practices in Australia are managed sustainably.

The 1992 National Forest Policy Statement established the vision of achieving ecologically sustainable forest management of all of Australia's forests: public and private native forests and plantations; which requires maintaining ecological processes and biodiversity within forests and optimising the benefits to the community from all forest uses within ecological constraints. In Australia, forested landscapes are likely to have been actively and adaptively managed by Aboriginal and Torres Strait Islander peoples for over 60,000 years.

The United Nations Forest Instrument defines sustainable forest management as a dynamic and evolving concept that aims to maintain and enhance the economic, social and environmental values of all types of forests, for the benefit of present and future generations. This requires analysis of data on all forest uses and values to determine a balanced but sustainable management regime for forests. At the national level, Australia uses the international Montréal Process Criteria and Indicators for Sustainable Forest Management to measure how well our forests are being managed. At the local level, production forest managers can demonstrate sustainable forest management through accreditation and regular audits under independent internationally recognised forest certification systems. Likewise, the managers of protected and conserved forests can become certified under the IUCN Green List Standard thereby recognising that these areas are managed for people and nature in a fair and effective way.

It is also worth noting that Australia has a growing balance of trade deficit in forest products (currently sitting at a deficit of more than \$4 billion AUD). Local demand for timber and wood products is increasing. Australia's current timber shortage is adding considerable cost of living pressures and driving up the cost of construction projects across the country. The Grafton area is the home of three of NSW's most innovative value-adding hardwood timber manufacturing plants, Big River Timbers, Marshall-Notaras Hardwoods and Koppers, each of which rely on timber harvested from State forests in northern NSW. Together these three companies produce many of the decorative and structural Australian hardwood timbers, that are so valued by many Australian households and the developers of modern sustainable buildings, as well as much of Australia's hardwood electricity poles.

¹ Australian Government 2018 *State of the Forests Report*

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Position

Forestry Australia considers that calls to end native forest harvesting in NSW State forests would not act to support climate change mitigation or address biodiversity decline, and would result in a range of unintended, negative flow on consequences. Most concerning for members of Forestry Australia is the apparent lack of consideration about the future management of State forests, and the risk of losing extensive regional capability for forest and fire management that would occur if native forest harvesting ceases. Without a clearly defined vision for forest management and retaining regional capability, decisions to end native forest harvesting will have serious consequences for NSW's capacity to effectively manage the future health and resilience of NSW's native forests and all forest values that depend on healthy forest ecosystems. Further, without an achievable vision for alternate wood supply options a position to end native forest harvesting would not only exacerbate existing shortages and cost of living pressures but disproportionately disadvantage rural and regional communities.

We urge the Clarence Valley Council to provide leadership and help create a positive vision for NSW State forests, with the capacity to maintain and enhance their important values, including producing sustainable wood supplies to meet local community needs.

Having a long-term vision for the management of State forests and the right regulatory framework can support long-term beneficial forest, climate and biodiversity outcomes through active and adaptive forest management. There are many opportunities to attract national and international capital to build an innovative forestry sector that can contribute to active management of State forests that is targeted towards maximising forest health, carbon and biodiversity outcomes, and expand the forest estate using native tree species. This includes biochar, biofuels and value-adding to native and plantation timber to produce innovative structural and appearance timber products. A limited vision of simply ending native forestry, that focuses largely on shutting down one industry sector, creates a negative policy environment for future investment and reduces the professional, contractor and timber processing capacity needed to realise future opportunities. This is likely to drive potential investors in NSW forests and regional industries away to other places where policy is more supportive.

Key Questions for the Clarence Valley Council to consider:

1. **What are the biodiversity benefits arising from ending native forestry in NSW? How will this decision enhance conservation at the landscape scale across NSW?** From 2019 to 2022 the NSW Natural Resources Commission from 2019 to 2022 has overseen research into the responses of koalas to native forest harvesting on the NSW north coast (contained within the proposed Great Koala National Park area). The research, carried out by eminent scientific researchers from the Australian National University, Western Sydney University, and the Department of Primary Industries Forest Science Unit, assessed koala and habitat responses to selective harvesting in north coast State forests. This is the most comprehensive research conducted to date in NSW on how koalas and their habitat respond to harvesting. The researchers worked in collaboration to investigate koala movement, occupancy, density, diet and the nutritional quality of koala habitat on north coast state forests. Overall, the research found selective harvesting did not adversely

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impact koala density, nor the nutritional quality of koala habitat and that koala density was higher than anticipated in the surveyed forests. This suggests the koala protections and wider landscape protections codified in the Coastal Integrated Forestry Operations Approval (Coastal IFOA) are effectively mitigating the risks from selective harvesting to date at the research sites.

Thinning is often a desirable management practice in dense regrowth forests to support and recover forest health, grow bigger trees quicker and reduce the risk of wildfire, drought deaths and insect attack, while providing a source of forest and wood products. Excluding harvesting from native forests limits the toolkit of management activities that can work to benefit biodiversity and does not guarantee protection or enhancement of conservation values that are under increasing threat from bushfire, climate change and invasive species.

- 2. What are the costs of ceasing native forestry (direct and indirect, including social and mental health impacts)? Do the benefits outweigh the costs?** Native forest management as practiced in NSW state forests encompasses a comprehensive approach that integrates Environmental, Social/Cultural, and Economic factors (ESG). It ensures the responsible use and conservation of forests, focusing on maintaining ecological balance, preserving biodiversity, and mitigating environmental impacts. Socially and culturally, it upholds the rights and well-being of local communities and indigenous peoples, fostering engagement and respecting cultural values. Economically, it promotes viable forest operations that generate lasting benefits, supporting livelihoods and contributing to economic growth. Harmonizing these ESG elements ensures forests are managed holistically and sustainably, striking a balance between ecological integrity, social inclusivity, and economic prosperity for present and future generations.
- 3. How does the NSW Government ensure active and adaptive management of NSW's forests, across public land tenures?** Given increasing threats from climate change, invasive species and severe bushfires, active forest management approaches supported by strategic and long-term investment, will be needed to support forest health and resilience into the future. Active forest management includes programs to mitigate invasive species, strategic planned and cultural burning, strategic firebreaks, maintenance of access tracks, landscape-scale monitoring and using silviculture to enhance forest resilience. By maintaining sustainable timber harvesting in small areas across the much larger forested landscape, the tools, skills and options remain available to conduct the various active management that will be required. The current contribution of the forestry sector to these important active management works is often overlooked or underestimated.
- 4. What are the impacts on bushfire management capacity, particularly maintaining access to the fire-related skills of forestry staff and the equipment and expertise of forestry contractors?** Science tells us that the bushfire conditions experienced in the Black Summer of 2019-20 will become the normal situation and in the driest summers we can expect bushfires to be much worse than those of 2019-20. Our forests and the biodiversity they support, be they in National Parks or State forest will suffer enormous impacts, as will the communities that live in proximity to these public lands unless we expand our capacity to improve the management of fire on public lands. As above, the current contribution of the forestry sector to bushfire prevention and response is often overlooked or underestimated.

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5. **What are the implications for Traditional Owners and their cultural, social and economic aspirations and their capacity to harvest and sell forest products, including timber if they choose, as part of their Country plans?**
6. **What are the implications for NSW's Regional Forest Agreements, if native forestry is ceased? How does it affect the Commonwealth's accreditation of NSW processes for Matters of National Environmental Significance and exports of forest products? How will this affect other forest operations, including plantation timber growing and harvesting?**
7. **Why move out of step with the rest of the world in supporting sustainable forestry and the use of wood products to tackle climate change and a circular bioeconomy?** Many other developed and developing countries have recognised the value of sustainable forest management and integrated forest operations in natural forests to meet their sustainable development objectives, including mitigating the impacts of climate change.
8. **Where will hardwood timber products used by NSW residents come from? Are we simply transferring the impacts to other places, including those with lower environmental protection measures to those applied in NSW?** Australia is heading for a timber supply crisis. Most house building and internal fitting depends on a ready supply of timber at an affordable cost. Australia's population is expected to increase from 21 million in 2011 to at least 30 million by 2035. Unless urgent action is taken now to develop domestic supplies of timber for this increasing population, Australia will need to import an increasing proportion of its timber needs. Imported timber is subject to price fluctuations/increases and competition from emerging economies, particularly China and Southeast Asian countries. Imported timber is often produced from areas which do not have the same rigorous standards of forest practices as Australia and has associated carbon costs of transport. Australian domestic softwood timber supply is expected to remain relatively static for the next decade and beyond, based on current policies, and growth in the area of plantation that produces timber for housing has not kept pace with population growth or timber demand over the past 15 years. Australian domestic hardwood timber supply is decreasing and expected to continue to decline due to continuing removal of native forests from commercial timber production, especially State-owned forests. Alternatives to wood for building materials, including concrete and steel, do not contribute to greenhouse gas emissions mitigation as well-managed forest do and sawn timber from plantations takes at least 25 years to grow.

Native forest harvesting provides an important source of wood products that are not able to be sourced from plantations and can deliver flow-on benefits through active forest management and silviculture to support forest health and resilience.

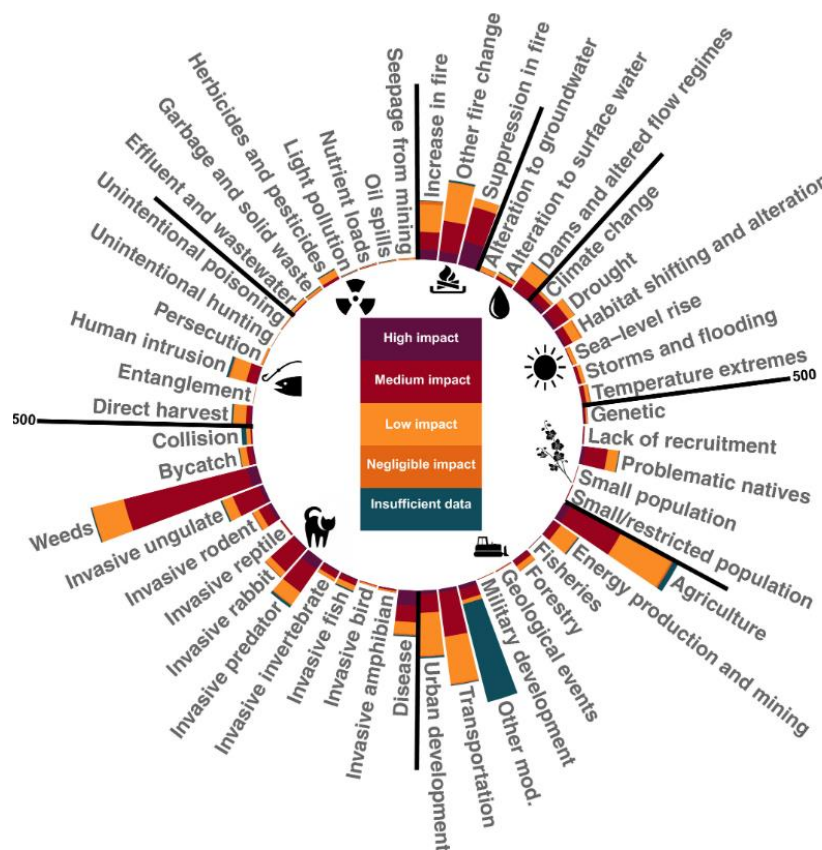
Additional considerations:

9. Sustainable timber harvesting in small areas of State forests has underpinned the development of an extensive road network and other infrastructure that has provided vital access to the whole forest estate for recreation, silvicultural works and fire management and protection. If sustainable timber harvesting was to cease, **substantial additional recurrent costs** will be incurred in actively managing State forests, including maintaining the extensive road network.

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10. **Well-managed timber harvesting is not a major threat to forest biodiversity in NSW.** The most important threats are urban expansion, feral animals (particularly deer, dogs, pigs, foxes and cats), climate change and altered fire regimes. At its current scale, the effects of timber harvesting on forest biodiversity can be readily managed compared to these other threats². [Figure 1](#) below shows the relative impact of threats from human activities on Australian biodiversity and forestry is insignificant in comparison to invasive species, urban expansion and agriculture.
11. **The evidence presented by ANU researchers, Professor Lindenmayer and colleagues, that timber harvesting makes forests more flammable is highly disputed by other scientists.** Fire scientists have long known that shorter trees are more likely to be severely burnt in bushfires than taller trees and evidence from the Black Summer bushfires clearly shows that many regrowth forests were severely burnt, regardless of whether they originated from timber harvesting or a previous bushfire. Ceasing timber harvesting in native forests will not reduce the risks from bushfires. For example, the Gospers Mountain fire in NSW burnt more than 500,000 hectares on public lands where timber harvesting is not permitted.

Figure 1: Number of threatened Australian taxa and relative level of impact for each subcategory threat, nested within the corresponding broad-level threat class.



² Australian Government 2018 State of the Forests Report
 Ward, M., Carwardine, J., Yong, C. J., Watson, J. E., Silcock, J., Taylor, G. S., ... & Reside, A. E. (2021). A national-scale dataset for threats impacting Australia's imperiled flora and fauna. *Ecology and Evolution*, 11(17), 11749-11761.

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12. **Ending native forestry negatively impacts on the NSW Government's Climate Change Adaptation Strategy.** It will reduce the State's capacity for forest carbon capture and storage in actively growing forests and harvested wood products and potentially increase use of non-renewable, emissions-intensive building products. This will also diminish Australia's capacity to meet the challenges posed by climate change to our forest estate, and in providing low carbon materials to society.
 13. **Ending native forestry impacts on a broad range of forest user groups.** This includes apiarists, fossickers, foragers, campers, horse riders, mountain bike riders, hunters and fishers. These groups access multiple use State forests that currently provide important values for the community that cannot be provided by national parks and other conservation reserves.
 14. **Ending native forestry is likely to increase risks to water yield and water quality.** Forests provide water to rivers and the catchments of many smaller rivers and communities. These values are best managed by actively managing catchments, maintaining diverse forest age structures, enhancing stream reserves and filter strips of vegetation along water ways, and managing feral animals. Reduced capacity to manage broadscale wildfire also has implications for long term water yields and water quality.
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