

Providing homes for hollow-dependent animals.

Supplementary submission to the Inquiry into the long term sustainability and future of the timber and forest products industry

Dailan Pugh, North East Forest Alliance Inc, April 2022

In 2019/20 NSW suffered record drought and extreme fire conditions, from August 2019 until February 2020 wildfires burnt around 5 million hectares of public and private land across the coastal regions of NSW, including 64% of native State forests. The ecological impacts were severe, billions of animals were killed, four animal and 61 plant species had more than 80 percent of their known localities impacted, and ecological carrying capacity was halved.

Heavy rainfall in January and February 2020 following the wildfires resulted in extensive erosion of soil and ash into streams, causing fish kills in the hundreds or thousands, extending down to the estuaries of some rivers, such as the Macleay.

The standard logging rules (CIFOA) were not designed to cope with the dramatically increased environmental impacts and vulnerabilities. There followed an ongoing dispute between the Environment Protection Authority (EPA) and Forestry Corporation (FCNSW) about how to modify logging to reduce the compounding impacts of logging in a heavily disturbed landscape.

To resolve the dispute the Government directed the Natural Resources Commission (NRC) to report on adjustments to logging of State forests in response to 2019/20 wildfires. In June their report, 'Final report Coastal IFOA operations post 2019/20 wildfires, June 2021' was presented to the Ministers for Forestry and Environment with recommendations for urgent implementation.

The NRC identified the standard logging rules (CIFOA) "*was not designed to mitigate the risks of harvesting in severely fire-affected landscapes like those from the 2019/20 wildfires*". Rather than revising the logging prescriptions, the NRC's general approach was to require increased retention of unburnt and partially burnt forests for 3 years post fire, according to the assessed risk on a broad Management Area (MA) basis.

The NRC identified 3 Management Areas (MAs), Narooma and Nowra on the south coast, Taree on the north coast, with "*risk of serious and irreversible harm to environmental values from the cumulative impacts of fire and harvesting*" where "*harvesting must be temporarily suspended for three years from the time of fire*".

FCNSW helped prepare the NRC report, but on 26 July started logging 1,187ha of Yarratt State Forest (SF) in the Taree MA, under an old logging plan, in full knowledge of the extreme *risk of serious and irreversible harm*. And they are still logging there now.

The only long-term change to the logging rules recommended by the NRC was:

The Commission has proposed temporary additional measures relating to hollow-bearing trees and recruitment trees for medium and high-risk zones. However, the Commission considers the following measures could also enhance the standard Coastal IFOA prescriptions:

- *retain a minimum of eight hollow-bearing trees per hectare where they exist (as per the requirement in the standard Coastal IFOA prescriptions)*

- *if hollow-bearing trees are not available, then retain suitable substitutes, in priority order being, potential future hollow-bearing trees, the largest mature tree in the stand or a regrowth tree that is not suppressed*
- *retain two recruitment trees per retained hollow-bearing tree*

It is clear that the NRC consider that this change should be permanent and applied across all native State forests.

The NRC recognised:

The Coastal IFOA standard prescriptions do not provide effective retention of feed and habitat trees, including recruitment trees in timber harvest areas of state forests, to support the persistence of species dependent on these resources in a severely fire-affected landscape

The hollows provided by old decaying trees provide essential homes for a plethora of native species. In NSW at least 46 mammals, 81 birds, 31 reptiles and 16 frogs, are reliant on tree hollows for shelter and nests, of these, 40 species are listed as threatened (NSW Scientific Committee 2007). (see section 3.2. Maturity Matters of NEFA's submission for a discussion of the importance of mature and oldgrowth trees).

Once a eucalypt tree is over 120-180 years old they may start to develop hollows in their branches and trunks and it is only once they are over 220 years old that they develop the large hollows required by many species. They are therefore not quickly replaced, unless there are retained large trees old enough to develop new hollows.

The NRC recognise:

... there is evidence that trees retained on logged sites have higher rates of mortality and collapse than trees in comparable unlogged sites and the mortality and collapse of trees retained in logged sites increases with logging intensity and the severity of post-logging fire.

Hence the need to retain 2 large old trees as potential recruits for each hollow-bearing tree.

Almost a year later the NSW Ministers for Environment and Forestry have done nothing, and have still not responded to the NRC recommendations.

Should they adopt this essential change for the survival of the multitude of hollow-dependent animals, it will have a significant impact on timber resources. This is in addition to the loss of trees from the fires, droughts and Bell Miner Associated Dieback as documented in my previous submission to the inquiry (see 2. Sus Yields, drought: 1.3. The Struggling Forests, fire: 2.4. 2021 Yield Review, Bell Miner Associate Dieback: 3.4: Bell Miner Associated Dieback).

The NSW Government is now intending to extend existing Wood Supply Agreements covering 77% of sawlog commitments for 5 years from 2023 to 2028 at current volumes based on dubious modelling, without duly accounting for the current, and potential future, loss of resources due to the fires, droughts and Bell Miner Associated Dieback, or any changes needed to accommodate the NRC recommendations for increased retention of habitat trees. Once again these guarantees of public resources from public native forests will be given to sawmillers for free, with no open tendering process, and expose taxpayers to more massive compensation claims if the commitments are unable to be met.

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