Submission No 102

INQUIRY INTO LONG TERM SUSTAINABILITY AND FUTURE OF THE TIMBER AND FOREST PRODUCTS INDUSTRY

Name: Mr Robert Bertram

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Submission to the inquiry into the long term sustainability and future of the timber and forest products industry

Thank you for the opportunity to provide a submission to the inquiry into the long term sustainability and future of the timber and forest products industry. With regard to perceptions of sustainability, since the introduction of integrated logging in the Eden RFA region the question has always been how long the native forest logging industry would last.

As indicated in one of the initial reports on integrated logging at Eden (1) the productive future of the industry after the first logging rotation (all alternate coupes logged) depended on the frequency and size of fires, adequate regeneration and its association with the degree of 'nutrient drain' in logged areas.

As a result of logging in the Murrah and Mumbulla forests during the early 1990's and the proposal under the Timber Industry Interim Protection act to log the majority of remaining unlogged coupes. Local residents engaged a soil chemist who undertook detailed analysis of soils in three compartments.

Consequently the compartments were not logged and in 1996 the notion of soil dispersion was introduced into the new Environment Protection Licence. Unfortunately the licence conditions, as time has demonstrated, resulted from collusion between Forestry corporation and its regulators to misrepresent the soil analysis and the inevitable outcomes. That was also to be the year soil landscape mapping for the area was to be published, but this was delayed for another year, apparently to ensure Forestry and the NPWS could ignore this science and the longer term impacts of their management on soils.

By that stage the number of Bell-miner colonies in gullies and along streams had greatly increased. On the property where I live, the bellminers first moved into a small gully on State Forest and within a couple of years had spread onto private property where, despite being removed on two occasions, they remain. However, the broad scale negative impacts of soil dispersion didn't appear until 1998 when the first extensive canopy dieback event occurred in the Southeast corner bio-region.

In 1999 CSIRO research in the Murrah river catchment (2) found most of the post European sediment in the lower reaches of the catchment had been deposited after 1960, rather than as previously assumed after clearing for agriculture in the upper catchment in the mid to late 19th century. This outcome is consistent with a reduction in soil fertility that increases the rate of soil erosion and dispersion, reduces the germination of many tree species and the growth rates of all trees.

The second extensive canopy dieback event, as indicated in the review of Forestry's limited growth data, occurred during the 'Millennium Drought' when thousands if not millions of trees died, particularly integrated logging regrowth but also many more mature trees in ares both intensively and previously selectively logged.

There have been several occasions when forests have been on the verge of wilting and browning since that time and the fact that government agencies continue to ignore this issue led to me nominating extensive canopy dieback (3) as a Key Threatening Process with the already listed Bell-miner associated dieback (BMAD) in 2019.

While it took the NSW Threatened Species Scientific Committee (TSSC) 6 years to reject my previous nomination to list the last remaining south coast koala population as endangered. If nothing else it acknowledge extensive canopy dieback is a threat to koalas. On this occasion it took only six weeks for the committee to decide (4) that extensive canopy dieback associated with dry weather and drought is a

result of all threatening processes. The decision was not published and I believe it was fundamentally flawed outcome that meant the agencies could continue to ignore extensive canopy dieback as they do with BMAD. It may be coincidence that on both occasions forestry koala experts were represented on the TSSC.

The end of the first rotation in the Eden region means the end of the sawlog log industry. The notion that logging regrowth will ever reach the dimensions required for high quality sawlogs is unrealistic. Even if trees were to grow at the rate forest growers prefer, the given impacts of stress on trees is most likely to result in internal defects in the logs, recurring with every stress event. However much people would like to think otherwise, there is no credible information to suggest these forests will ever be capable of producing anything other than pulplogs and very low quality sawlogs under current management.

Fire has long been acknowledged as a significant threat to regrowth forests in the Eden region. Even though there is an absence of credible information on tree mortality and 'dead topping' resulting from the 2019-2020 fires, particularly the Border fire. It is difficult to see how the woodchip industry can survive beyond the short term.

The claim in the review of forestry's resource data that ". . , It is likely that the transfer for four commercial forests into conservation tenure in the Eden region is a significant contributing factor to the requirement to harvest regrowth forests well before their optimal to meet yield flow constraints." Tends to ignore unplanned tree mortality and other information in particular the "indication that the regrowth forests of Eden may be growing slower and producing lower quality products than previously modelled." At the time of the RFA's forestry data indicated around 24,000 m^3 of sawlogs in the Murrah Flora reserves. More recently forestry have claimed there could be 40,000 m^3 of sawlogs. Either way the volume would not have kept the industry going for long.

The fact is there has only been one legal logging operation in the Murrah Flora reserves since 1996 and it was postponed. This is because logging these forests has been and continues to be difficult for forestry because they are well aware of the community opposition to further logging and the costs involved, even when they are successful with legal action aimed at stopping this opposition. A further complication is that taking local residents to court again could lead to unintended consequences regarding forestry's broader operations. While it is apparent the NPWS have every intention of pushing the last koalas to extinction, this is unlikely to reduce the opposition to further logging.

Despite the role of the government in addressing key economic, environmental and social challenges to the industry, the requirement for commercial trees to grow is the greatest impediment to any future for the native forest logging industry. The fact that more than 20 years have passed since the RFA's identified the need for forestry to implement a credible forest inventory and this has been ignored does not improve the situation. However one expects forestry cannot believe that their regulators and indeed the conservation movement, show no concern about forests moving from carbon sinks to massive carbon dioxide sources.

Regrettably the future of plantations is in a similar situation because the soil resource cannot sustain them indefinitely.

With regard to 'the operation, effectiveness and outcomes of the implementation of the NSW Forestry Industry Roadmap' the document refers to Ecologically Sustainable Forest Management (ESFM). According to the National Forest Policy Statement " . . . The Governments recognise the unique nature of Australia's biota and that the natural inter-relationship between native flora and fauna is essential for the health of the forest ecosystem."

However our local federally funded attempts to reintroduce native fauna into a cross tenure predator free exclosure were rejected by forestry, unless they could log the remaining coupes first and the NPWS because they have no interest in ESFM and seemingly couldn't care less about the obvious decline in forest health,

associated tree mortality, poor eucalyptus regeneration and slow growth. While forestry did initiate a dog and fox baiting program in 2004 the NPWS have abandoned the program.

In 2017 community comment was called for on a draft final working plan for the Murrah Flora reserves, produced by Forestry Corporation and the National Parks and Wildlife Service/Office of Environment and Heritage. No report on comments was produced and rather than being made publicly available, all submissions were suppressed.

Unlike state government agencies that make their own rules and get politicians to go along with them. Governments should have a duty of care to the whole community and the environment that supports them. In what many like to think of as a 'clever country' it would be reassuring to know that some politicians understood that ecologically sustainable forest management and thinking outside the square is required to achieve that outcome.

Robert Bertram

former - Nature Conservation Council representative, Forest Resources and Management Systems technical committee for the Eden and Southern RFA processes.

(1) Bridges, R. (1983) *Integrated Logging and Regeneration in the Silvertop Ash-stringybark Forests of the EdenRegion.* Research paper No.2 Forestry Commission of N.S.W.
https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0009/389556/Integrated-Logging-and-Regeneration-in-the-Silvertop-Ash-Stringybark-Forests-of-the-Eden-Region.pdf
(2) Evidence of Massive Landscape Change Unearthed – CSIRO press release on outcomes of sediment studies in the Murrah River (1999) http://bertramr.files.wordpress.com/2011/12/wallbrink-1999.pdf
(3) Nomination to list Dieback associated with dry weather and drought (DADD) as a key threatening process (2019) https://bertramr.files.wordpress.com/2019/08/daddktp.pdf
(4) NSW Threatened Species Scientific Committee decision -2019
https://bertramr.files.wordpress.com/2019/09/ktp-dadd-nsw-tssc-response-september-2019.pdf