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

**Organisation:** Colong Foundation for Wilderness

Date Received: 10 June 2021

# To: The Secretary, Portfolio Committee No.4 -- Industry

Inquiry into the long-term sustainability and future of the timber and forest products industry

Thank you for providing the Colong Foundation for Wilderness with an extension of time in which to make a submission to this inquiry.

Our submission is heavily focused on term of reference 1(g) but is also relevant to 1(b), (d), (e), (f) and (i).

#### About the Colong Foundation for Wilderness

The Colong Foundation for Wilderness is one of the oldest conservation organisations in New South Wales. It has been engaged with Government and industry at the forefront of advocacy for forest conservation, the extension of national parks and the protection of wilderness since 1968.

Our members believe that the future of the forests and wildlife of New South Wales are, at this time in history, held in the balance. The actions of Government and the community now will determine to what degree we face the future risk of catastrophic fire, the loss of countless animals and birds, and even the extinction of species that have been integral to the natural world in Australia.

#### Context: The Need to 'Build Back Better'

Most Australians were deeply shocked by, and many are still suffering trauma from, the devastation to human life, property, and wildlife from the never before experienced 2019/20 bushfires.

The crisis for Australian wildlife with the death, injury, and displacement of an almost unimaginable number of animals and birds, has left a legacy that, if not addressed, will have profound implications for the health and resilience of our native forests and the ecosystem services on which the vast majority of the Australian population rely.

The fires also created a crisis for wood supply from both our native forests and the plantation estate – a crisis that requires a new approach to wood production and a climate resilient recovery plan.

Whether for wildlife or wood supply, recovery planning must look to the future. We have witnessed the impact of 1.1°C of global temperature rise. Even if we limit warming to 1.5 degrees, IPCC modeling suggests the impacts will be 4 times worse than at 1 degree (IPCC, 2018: Global warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty [V. Masson-Delmotte, P. Zhai, H. O. Pörtner, D. Roberts, J. Skea, P.R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J. B. R. Matthews, Y. Chen, X. Zhou, M. I. Gomis, E. Lonnoy, T. Maycock, M. Tignor, T. Waterfield (eds.)]. In Press).

Securing the future for wildlife is linked to securing the future for all the ecosystem services our forests provide – notably fresh water supply and stable carbon storage. It has never been more important to understand the functional role of biodiversity in contributing to the integrity and stability of ecosystems, the services they provide and the well-being of Australians.

Decisions made now will determine the future of half Australia's wildlife species and not just the viability of the timber industry. But these are not the only considerations. Climate resilience for many other businesses and livability on the east coast of Australia will be shaped by the outcomes of this review.

## Climate change, fire and interaction with native forest logging

Evidence of the interaction between past logging, fire risk and severity and climate change was first published in 2018 ('Hidden collapse is driven by fire and logging in a socioecological forest ecosystem', Lindenmayer & Sato, PNAS 2018).

Following the 2019/20 fires, a bushfire recovery project led by Griffith University and ANU prepared five reports analysing all the relevant peer reviewed literature on critical issues affecting future management of our forests. Each report is relevant to this inquiry. They can be found at <a href="https://www.bushfirefacts.org">www.bushfirefacts.org</a>

Of particular relevance to this Inquiry are Reports Nos. 1 and 3 which examine the role of climate change (No.1) and the links to past logging and fire risk and severity (No.3). Report No. 4 examines the impact of post fire logging. Report No. 5 examines the efficacy of prescribed burning as a bushfire prevention tool and Report No. 2 examines forest recovery.

The scientific evidence is clear. Fire risk and fire severity is greater in young forests (10- to 30-years-old) than in long unlogged and old growth forests.

Preliminary citizen science work undertaken as part of the GU/ANU bushfire recovery project tested a new app to assess post bushfire condition and recovery. This preliminary work revealed a number of sites where all other factors were equal except forest age. At these sites fire severity dropped from canopy consumption in the younger forests to well below canopy level in the long unlogged/old growth forests.

#### The Fate of Australia's Wildlife

Catastrophic fires, coming on top of decades of habitat loss from logging and clearing, have created an almost unimaginable crisis for Australia's wildlife. Post the 2019/20 fires, remaining habitat is scarce and disconnected. Less than 10% of the fire affected forests are unburned (www.bushfirefacts.org)

Logging native forests, together with inadequate feral, pest, fire and weed management has left an extinction debt that must urgently be reversed. Post fire logging adds insult to injury when around 3 billion animals have been killed or injured, and countless others cling to survival in unburned or lightly burned refuges

that are desperately needed to sustain them in the short term but are too small to sustain them in the longer term.

Successful wildlife recovery depends on reducing all threats and developing a multi-tenure, long-term recovery plan that also reduces the risks to communities of future catastrophic fire. Securing the future for wildlife that utilise or depend upon our native forests requires increased protection, reconnection and restoration of habitat across their natural range. Adaptive capacity and resilience can only be achieved if recovery plans aim to restore the natural distribution and abundance of species.

Vanishing older forests provide irreplaceable food, nesting and other habitat resources for what's left of our forest dependent wildlife. Planting new trees cannot restore habitat provided by old forests for decades to a century or more! Allowing existing forests, especially the oldest of those scheduled for logging to keep growing is the fastest and lowest risk pathway for wildlife recovery and long-term resilience.

### World Heritage Areas at unacceptable risk

Australia's globally significant rainforest heritage includes the Gondwanan Rainforest World Heritage Area. Forests once buffered and protected by ancient, tall wet eucalypt forests are now exposed to unprecedented fire risk. Irreplaceable global heritage has been damaged perhaps beyond repair. Inherent weaknesses in the design of the Gondwanan Rainforest WHA have been known since its inscription and were shockingly revealed by the 2019/20 fires.

The high boundary to area ratio, inadequate buffers, in-holdings of cleared land and wood production forests and lack of connectivity have long been recognised as threats to the WHA and their globally significant rainforest heritage.

Recommendations to extend the boundary to include crucial areas of State Forest have been ignored. Increased protection and restoration are now an urgent

priority. The tourism benefits (and value) alone from improving the protection of this global asset far outweigh the wood value.

#### Adapting to climate change

Successful adaptation to already locked in and likely future climate change will depend on maintaining and enhancing biodiversity across the native forest estate. Diversity within and between species is essential to ensure a sufficient genetic pool for species to adapt and persist under changed climatic conditions (IUCN Policy on primary forests including intact forest landscapes (IUCN PF-IFL) 2020). Sadly, genetic diversity in forest ecosystems has been adversely affected by more than a century of removing key forest species and superior trees from our native forest ecosystems.

# Inherent tension between ecological imperatives and economic drivers of wood production

Tension has long existed between protecting biodiversity and the ecological integrity of native forests and economic pressures to reduce unit costs of wood production to compete with plantation supply.

It is important to note that timber supply reviews have always favoured protecting the industry over the environment, resulting in increased loss of key habitat resources, and helping to push a suite of species ever closer to extinction. The strain of looking for ways 'to have your cake and eat it too' has resulted in tinkering at the edges in the hope species will somehow cling to survival and not go extinct on our watch!

The difficulty of adhering to even modest environmental prescriptions in wood production native forests has been evident for decades. Until very recently it has been left to communities to find the people and resources to monitor logging operations. Whenever communities have monitored logging operations, serious breaches of environmental prescriptions have been found. Very few of those breaches have ever been prosecuted.

Post the 2019/20 fires the EPA has stepped up – developing tighter prescriptions in recognition that "fauna populations surviving in fire refugia in State Forests are at risk of elimination by timber harvesting under normal CIFOA which could prevent recovery, and cause catastrophic population decline in species such as the Koala, Greater Glider and Yellow-Bellied Glider". While these prescriptions were helpful, they are far from all that is required for wildlife recovery. Even so they proved too much for FCNSW.

FCNSW refusal to abide by these new requirements is not mere 'bloody mindedness'. It reflects the harsh reality that native forest timber production cannot afford to lose even more wood supply or bear increased environmental costs.

As we consider the future of native forest logging and the timber industry, it's worth remembering that markets have always determined the way forests are logged (Fashioning Australia's Forests, John Dargavel (ANU School of Forestry) 1995). A good example is the introduction of export woodchipping in the 1970s which led to the introduction of clear fell logging – a practice that greatly increased habitat loss.

The search for markets for trees not suitable for sawlogs was done, in part, to cross-subsidise saw log production. This rapidly became the key product by value and volume from native forests in southern NSW and an increasingly crucial subsidy in the North. Today the native forest sector is searching for a new market based on otherwise non-merchantable trees to prop up an industry in terminal decline.

# Post Fire Status of the Timber Industry

Both the plantation estate and native forest production forests were severely impacted by the 2019/20 fires.

Fires burnt 831,439 hectares of native forest as well as 5,252 hectares of hardwood plantations, amounting to about 50% of the native forest estate and 15% of

hardwood plantations. 52,000 hectares, or 25%, of the total softwood plantation estate was burnt, with the biggest impact around the south-west slopes and southern NSW, where half of softwood plantations are located. Around one third of plantations in Tumut and Bombala were fire affected (Forestry Corporation Annual Report 2019-20).

In native forests, fire impacts on harvestable areas differed substantially across the State. On the North Coast, an average of 44.3% of the net harvestable area was burnt, with supply zones 1 and 2 (from Coffs Harbour to the Queensland border) having over 60% of harvestable areas burnt. In the Southern and Eden RFA regions, an average of 80% of the harvestable area was burnt, with 85% burnt on the South Coast, 79% burnt in the Eden region and 69% burnt in the Tumut region. Specifically, in the Batemans Bay area of supply, a shocking 96% (78,868 hectares) of the area was burnt (NSW Parliament, Budget Estimates responses, March 2020).

The fires have had major implications for the financial viability of the native forestry sector, particularly the harder hit South Coast forests. While the full extent of impacts remain to be seen, as an indicator, the Forestry Corporation half-yearly financial report for the year ended 31 December 2020 posted an operating profit/EBIT loss of \$10.4million for the Hardwoods Division as a result of the bushfires (Forestry Corporation, Half-Yearly Report, 2021).

# Native forestry a pre-existing financial burden on the NSW Budget

In NSW, native forest wood production has long been subsidised by taxpayers – subsidies that have never been sufficient to enable the sector to compete with far more cost-effective plantation wood production.

The Forestry Corporation receives annual Community Service Obligation grants from the NSW Government of approximately \$17million (<u>Forestry Corporation Annual Report 2019</u>-20). This is to fund the provision of services – largely in public native forests – related to recreation and tourism, road maintenance and fire-

fighting. This results in a degree of cross subsidisation for the sector, particularly in relation to road maintenance.

The Forestry Corporation also avoids paying local land taxes, despite having significant impacts on roads and local infrastructure. For instance, Bega Valley Shire estimates that Forestry Corp avoids \$6.4million in annual rates (<u>Australian Institute</u>, '<u>Money doesn't grow on trees'</u>, 2016).

The Far South Coast REDS Impact Review noted that of the 14 industries assessed, forestry and logging had a gross value added of \$18million and sawmill manufacturing at \$11million, employing 107 and 121 people respectively, and ranked by both value and employment 13th and 14th.

Additionally, there is significant conjecture around how Forestry Corporation's Softwoods Division may provide cross-subsidisation opportunities for the Hardwoods Division, making Hardwoods appear more profitable than reality. These claims have arisen due to the opaqueness of Forestry Corporation financial accounts and the unclear division of staff and resources across the Softwoods and Hardwoods Divisions.

The above financial burden of the native forest sector on the NSW Budget is further compounded by the fact that even before the fires, the Hardwoods Division historically operated at a loss (<u>Australian Institute</u>, '<u>Money doesn't grow on trees'</u>, <u>2016</u>). Only in more recent years has native timber made the most marginal of profits. In the 2018/19 financial year, the Hardwoods Division contributed just 1.5% of Forestry Corporation's annual profit (\$1.1million from the Hardwoods Division and \$73million from the Softwoods Division).

As mentioned, in the 2019/20 financial year the fires further exacerbated this situation, with the Hardwoods Division contributing just 0.3% of Forestry Corporation's annual profit (\$0.4million from the Hardwoods, and \$59million from the Softwoods Divisions) (Forestry Corporation Annual Report, 2019-20).

It is worth noting that there have been substantial subsidies and reimbursements to both Divisions as a result of the fires (<u>SMH</u>, 'Forestry Corp facing massive revenue drop after record bushfire season', 22 Jan 2021).

#### Existing pre-fire timber supply issues

Markets for hardwood have been in decline, which will get worse as softwood engineered products become more prevalent and consumer awareness of the environmental impacts of the native forestry industry increases, as can be seen in the public vitriol at post-fire logging.

The impact of this is compounded by a serious resource scarcity issue, particularly for high quality timber on the North Coast. Wood supply has been plaguing the native forestry sector for years, yet the implications remain largely unaddressed by the Government. In 2014, the NSW Government made a failed attempt to address the issue by buying back 50,000 cubic metres of Boral's timber contracts over nine years at a cost of \$8.55million (ABC, State Government to spend \$8.5 million on north coast timber buyback', 24 June 2014). However, the impact of this decision to free up wood supply was negated by the decision of former Minister for Primary Industries, Katrina Hodgkinson, to simultaneously extend Boral's contract by 5 years.

Despite knowing the tenuous state of timber resources, in 2016, as part of the Forestry Industry Roadmap process, and major reform to the Coastal Integrated Forestry Operations Approval (IFOA), former Minister for Primary Industries, Niall Blair, committed to no reduction in wood supply and no erosion in environmental values (NSW Forestry Industry Roadmap, 2016). A fanciful commitment given that every attempt at wood supply sustainability has patently failed!

In more recent years, the Government has tried to open up further supply by engaging the Natural Resources Commission to 'remap' old growth forest and rainforest to enable logging of currently protected areas. However, this project was met with significant community opposition, particularly after the bushfires, and

was abandoned (SMH, ''Great result': Old-growth forests get reprieve from forestry', 25 June 2020).

Ignoring the wood supply crisis, which has been enormously exacerbated by the 2019/20 bushfires, will see mills close and jobs lost without any support or transition. The current wood supply agreements largely favour Boral, who receive the majority of the high-quality resource, while smaller players are sacrificed. Non-Boral contractors will be the first to feel the impacts of dwindling wood supply and quality – issues that will only be worsened as the impacts of climate change and increased weather extremes, such as drought or fire, inevitably arise

#### Employment in native forestry compared to plantations

Reliable employment data on the forestry industry in NSW is lacking, and we urge the NSW Government and the Forestry Corporation to act in good faith and supply this Inquiry with accurate employment figures, with sector, job type and regional breakdowns.

In any case, it is worth comparing approximate employment in the plantation sector to the native forestry sector.

It is widely understood that the native forestry sector employs less than 1,000 people across the entire estate. Recent documents show that in the Eden, South Coast and Tumbarumba regions combined, there are 180 processing jobs and 110 harvest and haulage jobs. On the North Coast, there are 400 processing jobs and 160 harvest and haulage jobs. This is a total of 850 native forestry jobs in NSW coastal forests. Native forestry employment in the North Western forests and the Riverina Red Gum forests would be marginal.

# The ecological and economic imperative to focus on plantations

The inherent competitive advantage of producing wood from plantations results from lower costs per unit of production, centralised supply close to manufacturing facilities, superior and consistent wood quality, greater predictability and lower

risk of wood supply and scalable manufacturing opportunities. Importantly the plantation sector offers superior, long-term job opportunities – already employing the majority of timber workers.

A substantial injection of public money into the timber industry is required to facilitate change and increase timber industry resilience in the face of climate change.

Assuming we wish to ensure NSW has a climate resilient and internationally competitive timber industry, and that we wish to ensure the health and well-being of our forests, wildlife and communities, it's important to assess where any public investment would best ensure forest and wildlife recovery; support climate resilient industry recovery; and contribute to other community needs, aspirations and expectations.

Native forest wood production is a significant drain on the State budget. Money that is desperately needed to support recovery of forest health, resilience and wildlife.

It would make ecological and economic sense to focus wood supply recovery on the plantation sector.

Recovery planning for this sector should include improvements in design and increased resources to manage and suppress fire. Designing defensible hubs for wood supply and manufacturing capacity and improving fire-fighting capacity to protect resource and manufacturing hubs would be far easier to achieve than attempting to protect wood resources in native forests.

# The role of forests in climate mitigation

For decades it has been assumed by most policy makers that logging native forests is carbon neutral. This scientifically debunked assumption persists in some quarters – ignoring the scientifically established reality that previously unlogged

forests store substantially more carbon than logged forests (IUCN PF-IFL). The substantially higher carbon stock in old growth forests (on average 50% more than the average stock in a native wood production forests) illustrates the opportunity cost associated with failing to allow forests to recover their natural carbon carrying capacity.

Confusion about the role of forests in climate mitigation has been compounded by carbon accounting practices that encourage a focus on additional sequestration through growing trees rather than prevention of emissions from existing forests. Even more misleading is the focus on **rates** of sequestration (higher in younger forests) ignoring the far greater **amount** of carbon that is sequestered in older forests (80 years+) at a landscape scale. Myths that old forests stop sequestering carbon have been scientifically defunct for over a decade ('Evaluating nature based solutions for climate mitigation and conservation requires comprehensive carbon accounting', Science of the Total Environment, Keith et al 2021).

Protecting all remaining big old trees is as important for climate as it is for biodiversity. The bigger the tree the more carbon stored in it. Big old trees can store as much as 90% of the carbon in a landscape (IUCN PF-IFL). Scientific understanding is shifting again as we increasingly appreciate the links between climate and biodiversity and that biodiversity plays an important functional role in the integrity and stability of ecosystems, and thus the provision of all ecosystem services including stable carbon storage. This re-consideration has been triggered by realisation that the biodiversity crisis is as serious a threat to life on Earth as the climate crisis, that losing biodiversity degrades ecosystems and increases the release of GHG to the atmosphere – an important consideration given that ecosystems store more carbon than in known fossil fuel reserves.

The UN Secretary General, and many others, now recognise that the two crises are entwined and must be tackled together (The Nexus Report: 'Nature Based Solutions to the Climate and Biodiversity Crises', Barber C.V, R. Petersen, V. Young,

B. Mackey, C. Kormos, F20 Foundations, Campaign for Nature and SEE Foundation, 2020).

Each crisis is amplifying the other. This downwards spiral can be reversed by improving the protection and restoration of natural ecosystems – and crucially Earth's natural forests.

The only comprehensive assessment of the carbon recovery potential from shifting from wood production to forest protection in native forests in Australia was published by ANU in 2008. The study utilised an old growth data set compiled from more than 400 plot sites. A significant number of plots were in NSW. ('The role of natural forests in carbon storage', Keith et al, ANU E press, (http:epress.anu.edu.au/green\_carbon\_citation.html) 2008). The method used was peer reviewed and published in PNAS in 2009 ('Estimating carbon carrying capacity in natural forest ecosystems across heterogeneous landscapes: addressing sources of error', Keith et al, Global Change Biology,2010). Further regional assessments were conducted in southern NSW and Victoria. The findings that conservation is a superior climate mitigation strategy to logging + harvest wood products were clear and published in ('Managing temperate forests for carbon storage: impacts of logging versus protection on carbon stocks', Keith et al, Ecosphere 2014).

Moreover, a study in 2019 noted that the carbon benefits from harvested wood products and product substitution had been substantially overestimated by 2-100 fold. ('Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions', M.E. Harmon, Oregon School of Forestry, Environmental research letters, 2019).

In Australia, examination of this issue revealed that protection from logging provided superior climate mitigation benefits to all wood production scenarios. ('Under what circumstances do wood from native forests benefit climate change mitigation?' Keith et al 2015, PLOS One)

The quantum of additional carbon sequestration and storage if logging ceased in NSW native forests over 10-, 30- and 100-year time frames needs to be comprehensively assessed. Even more importantly the emissions avoided by withdrawing logging also need to be assessed. Emissions avoided plus additional sequestration (from allowing forests to grow past their scheduled logging age) creates a double plus in terms of what the atmosphere sees.

The potential benefit for the State's carbon account is illustrated by Tasmania – the first State to reach 'net zero' thanks to withdrawing logging from a substantial portion of the State's public native forest estate.

In 2020 the report on the Greenhouse Gas Inventories of Australia's States and Territories revealed that by 2018 net emissions had declined by 111.2% compared to emissions levels in 2005, mainly due to reductions in native forest logging. As a result, Tasmanian emissions fell below net zero!

#### Beware false climate solutions

Burning wood for power is the favoured choice to prop up a native forest wood production sector in crisis – falsely promoted in the name of climate mitigation.

Created by a loophole in international carbon accounting rules, scientific concern about the adverse impact of this new industry for climate and biodiversity are mounting. The consequences for wildlife are devastating (any tree is suitable for biomass wood production). And as the attached scientific publications indicate, substituting wood for coal has a negative impact on climate change.

Arguments that burning wood for power are carbon neutral ignore crucial facts. Whatever age a forest is logged and burned is the time it would take to recover carbon released to the atmosphere. Forests sequester more carbon (at landscape scale) in the last two thirds of their life than in the first third. The opportunity cost of allowing forests to keep growing to their biological carbon carrying capacity is

never assessed. And, burning wood is more emissive per unit of energy than burning coal (<u>Biomass Basics</u>, <u>Biofuelwatch</u>).

#### Support for other forest-based growth sectors

A recent study by the University of Newcastle found that converting wood production native forests on the north coast of NSW into a Great Koala National Park would create almost 10,000 full time jobs and increase total economic output for the region by \$1.18billion over 15 years (<u>University of Newcastle, 'Great Koala National Park Economic Impact Assessment And Environmental Benefit Analysis', Feb 2021</u>).

Burgeoning interest in citizen science 'tourism' in southern NSW points to the importance of fostering nature-based experiences in forested regions close to towns and villages.

Recovery of walking tracks and other appropriate tourism infrastructure would create many other job opportunities.

#### No Social License for logging Native forests

In 2018, a report commissioned by Forest Wood Products Australia was leaked that outlined "Community perceptions of Australia's forest, wood and paper industries & implications for social license to operate". The report was written by leading researchers at Canberra University, Jacki Schirmer, Lain Dare and Mel Mylek. However, the report was never publicly released.

"The 'acceptability' level of social license was assessed through asking survey participants how acceptable or unacceptable they found each of these three activities on a seven-point scale:

· Native forest logging was considered unacceptable by 65% of rural/regional and 70% of urban residents across Australia, and acceptable by 17% of rural and 10% of urban residents. Eleven per cent of rural/regional and 9% of urban

residents found this neither acceptable or unacceptable, and 8% and 11% respectively were unsure whether it was acceptable.

- Tree planting for wood/paper production on good agricultural land was considered unacceptable by 29% of both rural/regional and urban residents, and acceptable by 47% of rural/regional and 43% of urban residents, with the remainder (24% and 28% respectively) either neutral or unsure.
- Tree planting for environmental purposes on good agricultural land was considered unacceptable by only 12% of rural/regional and 9% of urban residents, and acceptable by 72% and 73% respectively, with 16% of rural/regional and 18% of urban residents unsure or neutral.

There are therefore much lower levels of social license for native forest logging than for producing timber using plantations. Additionally, views were very strong about the unacceptability of native forest harvesting, with most of those who indicated it was unacceptable choosing the response of 'very unacceptable' rather than moderately or slightly unacceptable."

#### Conclusion

We are at an inflexion point for our forests, wildlife, and the timber industry. It is within our power and capacity to speed up a naturally occurring transition to 100% plantation wood supply and focus management of our forests on recovery for wildlife, climate mitigation, adaptation, biodiversity protection and ecological recovery.

It beggars belief that anyone continues to support logging our native forests when we have witnessed decades of failure to achieve sustainability and hundreds of millions of dollars poured into propping up a small part of an industry incapable of competing with the more efficient, and job rich, plantation sector.

Surely we have the commonsense to direct support for jobs, manufacturing capacity and transformational change to the plantation sector. We can 'build back better' by supporting jobs and recovery in that sector while at the same time supporting the recovery of our irreplaceable native forests for wildlife, water, carbon sequestration and storage, and community well-being.

Our actions now will determine the health of our forests, risk of future catastrophic fire and the death or survival of countless animals and birds including the extinction, or not, of species that play an important role in maintaining the Nature of Australia.

The fate of our Koalas is just the tip of the iceberg and loss of our precious and irreplaceable forests and wildlife will not be forgotten or forgiven.

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10 June 2021