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South East Timber Association Submission to the Portfolio Committee No. 4 – Industry Inquiry into the Sustainability of the NSW Forests Products Industry Overview

South East Timber Association (SETA) members support government policies that are committed to ensuring public forests are available for a range of commercial and recreational activities and expect land management policies and practices will maintain environmental values in the long term.

SETA expects the government to commit to ensuring forest and related policies strike an appropriate balance between social, environmental and economic outcomes, while minimising adverse impacts of policy changes on regional communities.

With the wide scope of the inquiry into the long term sustainability and future of the timber and forest products industry, the SETA evidence will focus largely on Part 1(b) of the terms of reference, including fire, regulatory structures, habitat protection and local, state and federal policies affecting these issues.

Timber and all other forest products produced from natural forests and plantations, are currently the most sustainable materials we can use for building, communication papers and a host of current and emerging uses, if the overall forest estate is managed sustainably.

SETA has the view that we cannot have a sustainable timber and forest products industry, unless the forests and plantations that supply the industry are managed sustainably over the long term. Given the interconnective relationship of forests across the landscape, sustainable forest management must be viewed across both public and private land, including the conservation reserve system.

Sustainable forest industries must have a sustainable land base. Since the "Comprehensive, Adequate and Representative (CAR) Reserve System was established as part of the Regional Forest Agreement (RFA) process, there has been an ongoing erosion of the State Forest land base available for timber production. Reservation levels of NSW tall forests, under the RFAs exceeded international benchmarks.

A Terra Nullius Conservation Regulatory Framework

The terra nullius approach to environmental management of harvesting operations and adjacent "environmentally sensitive areas" in NSW, is emphasised by the language of preservation, rather than conservation. Terms include "permanent protection," "permanent retention," "long undisturbed patches" and "wilderness."

In June 1972, an early terra nullius opinion was voiced in the NSW Bush Fire Bulletin by two botanists from the Royal Botanic Gardens and National Herbarium in Sydney.

With regard to the ecological effects of high intensity summer bushfires compared to the ecological effects of low intensity fires in other seasons, the botanists expressed the opinion that: "*These (regular planned low intensity fires) will be damaging to flora and fauna (using any definition of "damage").*"

Natural fires generally (if not always) occur during hot, dry, windy weather in summer, or at least the hotter months. It is this regime to which our plants (and animals) are presumably adapted. To state or suggest that winter hazard reduction is a substitute for, or equivalent to, summer wildfire is quite ludicrous. Most plants and animals have growth rhythms which



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reflect seasonal conditions and to superimpose a completely alien fire regime may well be more devastating than the occasional "10 year" crown fire.

These botanists seem to have denied Aboriginal burning over the past 50,000 years (plus or minus) was not confined just to the summer months and has shaped the evolution of the Australian biota. They gave no evidence of understanding that more frequent fires of low intensity (less than 500 kilowatts/metre) covering a percentage of the planned burn area, have much more subtle effects on biodiversity than high intensity bushfires emitting 5,000 to 80,000 kilowatts per metre of fire line and covering the whole of tens of thousands of hectares.

Fifty years later, a number of fire and ecology experts continue to have what might best be described as a poor understanding of fire intensity under varying fuel loads and weather conditions and the consequential impacts on biodiversity.

Much of the key NSW regulatory framework is written from a terra nullius view of the NSW natural environment. The current natural environment regulatory framework purports to protect scrubbed up forests, in declining health, that are an artifact of more than 200 years of European neglect. The authors of this framework exhibit a failure to understand the effect Aboriginal fire management has had on ecological development in NSW.

The Wilderness Act 1987 underpins the principle of forest being "preserved in its natural state" and supports the terra nullius view, rather than active management practiced by Aboriginal people.

The NSW environmental law must be rewritten to facilitate an active and adaptive approach to conservation management.

Is 80 Percent of Available Public Land Enough to Deliver Sustainable Conservation Management, Supplemented by Non-reserve Public and Private Land

The NSW parks and reserves system current occupies 80 percent of the public land base potentially available for reservation. State Forest, including areas reserved from harvesting make up the remaining 20 percent. Ongoing activist campaigns to eliminate all native forest harvesting in NSW and the failure of the reserve system to fully deliver protection of biodiversity, has resulted in successive NSW governments continuing to erode the land base available for timber production.

On page 2 of the NSW NP&WS September 2021 Zero Extinctions Report, it states: "*There is evidence that the overall decline in biodiversity in NSW is occurring even in the national park estate.*"

Despite up to a century of timber production, biodiverse State Forests continue to be transferred to national parks, to shore up conservation objectives, including koala protection. When will government and conservation bureaucrats ask, if multiple use state forests are delivering conservation outcomes to the same or higher level than national parks, why is there a need to change land tenure?

In July 2016, the NSW assessment of the conservation status of the Southern Brown Bandicoot (SBB) population report (Ben Hope) was published. The introduction on the Environment NSW website notes: "*southern brown bandicoot (eastern) has likely undergone*



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a severe reduction in numbers of at least 50 percent over the past 10 years, and the causes have not ceased and are not well understood..."

The report noted that in the period from 1999 to 2008, the SBB populations in the Ben Boyd National Park had declined by 44 percent and Nadgee Nature Reserve population by 47 percent.

Due to increasing populations on state forests in the Eden area, in 2014-16, FCNSW handed over both Long-nosed Potoroos and Southern Brown Bandicoots to staff from Environment Australia, Taronga Zoo and the ANU. These animals were used to repopulate the Booderee National Park near Jervis Bay, where these species have been locally extinct for more than 100 years.

Fire in Forested Landscapes.

To protect and improve the forests, all forests must have active and adaptive management, that recognises the Australian biota has evolved under active Aboriginal management for tens of thousands of years. Prior to European arrival, much of the Australian environment was not "long undisturbed." Fire was a primary agent of disturbance and much of the Australian vegetation and many plant, bird mammal and reptile species are dependent on regular disturbance by low intensity fire, rather than irregular, catastrophic disturbance by mega fires.

Aboriginal landscape scale use of fire must be reinstated, if the ground and understorey fuel levels are to be managed. NSW is currently on track to subject more and more public and private native forest to a catastrophic mega fire cycle, which regardless of changing CO2 levels, would not occur if Aboriginal people had continued to manage the forests.

The NSW mega fire record over the past 18 years has confirmed that the supposed "protection" of biodiversity, by simply transferring public land from state forest to national park, has been a false and misleading political position and a deeply flawed conservation policy position.

The RFS and the Bushfire Co-ordinating Committee.

The NSW bush Fire Co-ordinating Committee (BFCC) has responsibility for planning in relation to bush fire prevention and coordinated bush firefighting. It also advises the Commissioner on bush fire prevention, mitigation and coordinated bush fire suppression.

Fuel reduction burning is a key component of any bush fire mitigation program. From 2015-19, the NP&WS target for fuel reduction was set at 1.9 percent of the gross area and for FCNSW, one percent. Private property targets were typically around 10,000 hectares each year. No targets were reported for the past two years.

These figures provide totally inadequate mitigate high intensity bushfires effects at a landscape level. These figures do bring into question as to whether the BFCC has a membership with the necessary skills to fulfil its statutory obligations.

Based on figures from the Rural Fire Service (RFS) annual reports, the average area of annual FRB over the past 17 years, is almost 70 percent lower than the average for the first four years of the 21st century. More than 50 years of research and field experience have confirmed that about eight percent of the forested landscape needs to be fuel reduced annually, to provide a reasonable level of bush fire mitigation.



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The current arguments put forward by fire research academics that fuel reduction burning should be concentrated adjacent to human assets give no thought to mitigating the bushfire risk on the state's biodiversity assets. Consequently, it is these assets, protected by legislation, but in reality, undefended from mega fires that pay the ultimate price for our failure to undertake adequate levels of bush fire mitigation.

Ecological Benefits of Frequent Low intensity Burning.

Farmers have long understood the role of soil chemistry in determining the success or failure of farming operations. Soil pH (acidity) and overall fertility are key issues that must be addressed, to grow healthy crops and pastures. Farmers know that increasing levels of available aluminium, manganese, copper and zinc, with increasing soil acidity, means unhealthy or dead crops.

In the case of natural ecosystems, much less research has been done to understand the impact of changing soil chemistry on the underlying health of Australia's native forests. Many public land managers and university academics seem to presume that the soils in a "natural" ecosystem are a constant. It is noted that dieback has markedly increased since the recorded level of low intensity burning in NSW dropped by an average 70 percent in the years since 2004.

Research published by, Turner et al 2008 Research published by, Turner et al 2008¹ found: *"The combined data indicate that changes occur in forest soils when there is a long period of exclusion of fire. It is suggested that these changes generally lead to secondary changes, such as in pH and availability of other elements such as aluminium."*

High Intensity Bushfire Impact on Water Quality and Catchment Water Yield.

Following the 2003 wildfires, CSIRO scientists undertook research to determine the potential impact of the bush fires that burnt 700,000 hectares of forest in North East Victoria. The study did not include the water yield impact of bush fires, which burnt over a million hectares of the main range in NSW and the ACT at the same time as the Victorian fires.

Dr Richard Benyon stated *"The worst case scenario is by the year 2020, there will be a reduction in water yield from that area of about 80,000ML (80,000,000,000 litres) each year. We didn't take into account the affect of change, if there is any change in climate . . . then reductions could be increased."*

The regeneration from these fires would take up all of the water projected to be returned to the Murray River, as a result of Victorian water saving initiatives over the 20 years from 2003. Despite this advice, there has been no management of this regrowth, or the regeneration resulting from the 2007 high intensity bush fires that affected additional areas of the Murray River catchment. Water quality in high intensity fire affected catchments is degraded for years, when all ground cover from ridge lines to riversides is removed. Thinning of regrowth whether it comes from high intensity bushfires or harvesting, is essential for improving ecological, fire mitigation and catchment water yield outcomes.

NSW must take a lead in altering the course of the current mega fire Titanic, if we are to avoid another wave of faunal extinctions. Any future climate variability is another reason to act, not a reason to do nothing or continue to implement the same failed ecological and forest management policies.

