

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

**Organisation:** Friends of the Forest (Mogo)

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## Long term sustainability and future of the timber & forest products industry



*Canopy destroyed in breach incident at Mogo State Forest compartment 144 in 2018*

Dear Chair, Deputy Chair and Inquiry Committee members,

Thank you for the opportunity to contribute to this landmark inquiry. On behalf of the local community group Friends of the Forest (Mogo) I wish to offer the following observations gleaned from over 5 years of monitoring logging operations on the NSW South Coast in the southern region.

### **Back Story**

Our group formed following the distress of local residents to the logging happening on their doorstep in Mogo State Forest immediately behind residential areas of Batehaven and Surf Beach and around the headwaters of the Tomaga River.

We met with Forestry Corporation ecologists on site who revealed that during the scant pre-logging faunal surveys they were not permitted to enter the forest at night except on vehicle tracks because of workplace health and safety protocols. Hence they had not detected the presence of the endangered Greater Gliders, Yellow Bellied Gliders or the wombats living in the harvest zone. We spotlighted that night on mountain bike tracks and recorded Greater Gliders and Yellow bellied Gliders. The local WIRES group located the active wombat burrows.

It was right then that we realised that we couldn't rely on Forestry Corp to determine what precious fauna and flora existed in compartments due to be logged. **The community had to step up.** With the advent of the new CIFOA the requirement for FCNSW to undertake field survey was removed altogether. Furthermore fauna records more than 10 years old are not even taken into account. We started to track where logging was about to occur with a view to conducting our own pre-logging surveys.

We had to rationalise our efforts and decided to focus on compartment 517 at the back of Buckenbowra State Forest which was surrounded by Monga National Park which we campaigned unsuccessfully to be incorporated into the National Park despite our cameras capturing Greater Gliders and Spotted Tailed Quolls within the compartment.

### **Community Compliance Monitoring**

We started to monitor compliance of logging operations, a massive undertaking considering the complexities of the then IFOA and the large and distant areas involved. We quickly realised that Forestry Corp couldn't be relied upon to manage their contractors to operate within the IFOA.

We began reporting breaches by the contractors to the EPA who would eventually go and investigate for themselves. We have kept a record of some of these incidents which you are welcome to visit at

[https://drive.google.com/drive/folders/1RQHHNURp-DB05PV\\_o2Aqtqe4LFfQ\\_A1?usp=sharing](https://drive.google.com/drive/folders/1RQHHNURp-DB05PV_o2Aqtqe4LFfQ_A1?usp=sharing)

This year the Nature Conservation Council of NSW have started their own version of this Breach Patrol.

We have concluded that both the IFOA and its successor the CIFOA are worded in such a way that there is usually enough wriggle room for the FCNSW and its contractors to avoid consequences of any transgressions we have detected.

However in March 2021 the EPA decided to fine FCNSW for negligence in 3 of our local forests in 2019 in relation to Swift Parrot provisions. Refer to

[https://www.epa.nsw.gov.au/news/media-releases/2021/epamedia210301-forestry-corporation-fined-\\$33k-for-failing-to-keep-records-endangering-parrots](https://www.epa.nsw.gov.au/news/media-releases/2021/epamedia210301-forestry-corporation-fined-$33k-for-failing-to-keep-records-endangering-parrots)

There are also these examples to cite but few:

<https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia201008-epa-prosecutes-forestry-corporation-for-alleged-breaches-in-koala-exclusion-zones>

<https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200723-epa-orders-stop-work-on-forestry-operations-in-south-brooman-state-forest>

<https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200718-epa-orders-stop-work-on-forestry-operations-in-wild-cattle-creek-state-forest>

[https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200427-forestry-corporation-fined-\\$31100-after-epa-investigation](https://www.epa.nsw.gov.au/news/media-releases/2020/epamedia200427-forestry-corporation-fined-$31100-after-epa-investigation)



<https://www.nature.org.au/media-releases/2013/07/nsw-forestry-corporation-convicted-for-environmental-breaches-yet-again/>

These are not the hallmarks of a responsible industry operating sustainably. They are demonstrations of a corner-cutting industrial harvesting sector willing to do whatever it takes to stay afloat even with the loss of social licence so starkly shown in the industry-initiated survey of 2016 which showed even 5 years ago 65% of respondents found native forest logging unacceptable:

<https://www.smh.com.au/environment/sustainability/bush-turns-its-back-on-support-for-logging-native-forests-20181113-p50frc.html>

### **Post-fire Experience**

There is a long list of fines or prosecutions for breaching on the South Coast (list supplied on request). However since the 19/20 fires the rate of breaching has increased exponentially. In fact in NSW Parliamentary Estimates earlier this year EPA CEO Tracey Mackey indicated that there were still 16 outstanding penalties or prosecutions related to logging operations in NSW in 2020 alone.

We can confirm this as community members entered the forest in April 2020 shortly after post-fire logging recommenced in Mogo and South Brooman State Forests finding hollow bearing trees scattered all over the forest floor and 3 giant trees felled. 2 stop work orders were issued in an attempt to ensure that both contractors and FCNSW alike operated within the Site Specific Operating Conditions imposed by the EPA. However when logging resumed again breaching resumed, demonstrating the complete inability of the contractors and FCNSW to comply. They knew they couldn't comply and yet they continued to operate, knowingly and willingly committing breaches.



*Hollow bearing tree – one of over 100 felled in South Brooman State Forest compartment 58 in 2020*

It was a 3 way failure:

- 1 Failure of the contractors (eg to leave all hollow bearing and giant trees standing)
- 2 Failure of FCNSW to monitor compliance of its contractors
- 3 Failure of the EPA to monitor the operation in a timely fashion

It took the community reporting of over 100 incidents in South Brooman and over 75 in Mogo State Forest to prompt the EPA in action which was at best only halted the breaching for a period of time. **It shouldn't be up to us to do this work.** We are the only actors in this sector who are **not** paid and yet every else is on a wage or salary and they have variously failed in their remit.

This is one reason we believe that it is long overdue that logging our native forests should cease, and that they should be sustainably managed for values other than timber production. These values would recognise our trees are more valuable left standing for instance as carbon sinks, threatened species habitats, clean water catchments, ecotourism and human recreation opportunities in an increasingly urbanised world.

Over the past decades we have observed that logging gradually has resulted in simplified and younger forest ecosystems with diminished biodiversity. The unsustainability of this ecological dimension is exemplified by many threatened species including the decline of the Swift Parrot population which is now considered to be 300 individuals. Our South Coast native forests provide a crucial nectar source in winter for this bird especially between Ulladulla and Merimbula, a nationally recognised Key Bird Area. You would think every effort would be made to preserve every potential tree for the Swift Parrot yet contractors need only save 5 nectar trees per hectare in the current operation in compartment 180 in Mogo State Forest where more and more trees are being felled now as I type (24<sup>th</sup> May). And so its slide towards extinction proceeds. On our watch. In our backyard.

### **Tree Retention Protocols**

Another key reason why the industry is not ecologically sustainable is the tree retention protocols in the CIFOA. Under the existing rules the harvest plans set aside 8 trees per hectare as Habitat trees. This in recognition of the 140 or so native species which use tree hollows for roosts, nests and shelter for survival some of which are already listed as threatened or endangered. Under this regime over time we will end up with no trees old enough to develop hollows as the middle aged trees on their way to hollow development will be "harvested" before they have a chance to develop hollows. The old hollow bearing trees will gradually die out and without replacements the forests becomes a no-go zone for hollow dependent species. This is a massive blow for biodiversity and patently unsustainable.

### **Threatened Species Case Study**

For threatened species the native timber industry is bad news. As a case in point witness the **Swift Parrot** now estimated to be down to 300 individuals. The CIFOA



recognises the vulnerability of the critically endangered Swift Parrot by specifying the requirement to retain 5 nectar trees per hectare during operations.

So in Mogo SF compartment 180 (currently being “harvested”) which has a net harvestable area of 208 hectares a “reasonable person” would expect to see 1664 (208 x 8) trees retained as habitat trees and 1040 (208 X 5) trees retained as nectar trees. However in this compartment there are very few nectar trees marked for retention.

This fact was reported this to the EPA in April 2021 and the verbal ruling came back that FCNSW were allowed to double up by deeming that 5 of the 8 retained habitat trees per hectare as also nectar trees. It effectively means that **up to an extra 1040 trees** can be felled and in this case depriving a critically endangered species of food. And that is just in one compartment!

This interpretation of the CIFOA is totally against the spirit of the document but more to the point it is another nail in coffin for a threatened species. Unsustainability exemplified.



*Greater Glider survivor of the 19/20 fires on the South Coast*

## **Trust the Science**

Of course when it comes to the advisability of logging forests severely impacted by fire Professor David Lindenmayer world renown forest ecologist is in no doubt. He has repeatedly said that to move in and log fire-impacted forests can set back their recovery by 200 years. This is a clear indication of the long term unsustainability of the native forest industry since 85% of the “resource” was burnt in the huge 19/20 fires, the worst naturally destructive event on the planet in recorded history. Hear David talk in this clip: <https://www.youtube.com/watch?v=bt-WDa-ZKE>

The 19/20 fires did change everything and provided an ideal opportunity to transition out native forest logging altogether as I have pointed out in this article: <https://newbushtelegraph.org.au/a-golden-opportunity-to-pivot/>

## **Unsustainable Economics**

Other submissions will deal with the unsustainable economics of the native forestry sector in NSW. It only survives with public subsidies which is ironic and shameful given that the public overwhelmingly rejects the whole concept of continued logging of our native forests. One equivalent would be public subsidies going to prop up the tobacco industry. Clearly ridiculous. I believe a major accounting firm is currently undertaking a privately sponsored review of the economics of the sector. However it is worth mentioning recent work done by David Shoebridge MLC. Analysis of Forestry Corporation’s own figures obtained by his office show the profit from native forest logging in 2019/20 was a just \$28.03 a hectare. He asserts that over the last five years native logging profits have declined from a high of \$225.85 per hectare in 2016/17 to a fraction of that. This means an average profit of less than 20 cents for each mature tree logged. Hardly sustainable in anyone’s language.

## **Conclusion**

This is the perfect time to draw a line under the demonstrably unsustainable native forest logging industry in NSW, and transition to a 100% plantation based resource. The public support for the sector is at an all-time low so the political cost of justly winding back the industry will be minimal. An exit strategy could easily involve the re-deployment of all existing logging dependent workers on both the North and South Coasts. It just takes a little vision and courage.

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