



1 December 2016

To: The Hon Mark Speakman, Minister for the Environment and Heritage.  
office@speakman.minister.nsw.gov.au

cc: Ms Shabnam Gill, Acting Director Forestry, Environment Protection Authority.  
Ms Jackie Miles, Manager Strategic Regulation and Reform, Forestry, EPA.  
jacquelyn.miles@epa.nsw.gov.au  
Ms Paula Lustri, EPA. Paula.Lustri@epa.nsw.gov.au

From: Great Southern Forest (GSF) Team <contact@greatsouthernforest.org.au>

Dear Minister Speakman,

Re: Correspondence to the Hon Mark Speakman, Minister for the Environment–MD16/4020

Thank you for your email of 10<sup>th</sup> October 2016 regarding the Great Southern Forest; a proposal which presents a climate sensitive way to create jobs and protect the public forests of south east NSW.

We respond to sections of your letter as we view them from our environmental protection perspective.

#### Murrah Flora Reserve

The local community, conservationists and the Biamanga Board of Management welcomed creation of the Murrah Flora Reserve. We attach an article regarding it, published in the National Parks Association's magazine *Nature NSW* <sup>1</sup>. We applaud your indication that the forests will be managed "utilising evidence-based and scientific landscape management principles and rigorous monitoring of outcomes". The principles of the Great Southern Forest proposal complement this initiative for over 400,000 ha of the public forest estate. We also strongly support the opportunities afforded by both these initiatives to get Aboriginal people back on Country and involved in forest landscape restoration.

However, we also note that the exclusion of logging from the Murrah Flora Reserve's forests in order to protect koalas and 25 threatened species is an admission that logging compromises environmental values.

#### Carbon

Your pilot project in three National Parks, a wetland and a reserve shines a positive light in recognition of the role which stored carbon plays in helping to address climate disruption and, through the evolving carbon economics system, fund forest restoration and eco-tourism industries.

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Your statement: "The project involves planting more than 200,000 trees in over 520 hectares of national parks and reserves over five years, which will result in almost 80,000 tonnes of carbon dioxide being sequestered from the atmosphere over 10 years" is worth comparing to the easy option of immediate carbon dioxide sequestration by simply just stopping logging over 400,000 ha of the Southern Forest Region's State Forests.

Economists advise that ceasing to log the Southern Forest Region could save up to 2,000,000 tonnes of carbon dioxide emissions per year<sup>2</sup>. If these reductions were eligible to earn carbon abatement credits from the Australian Government's Emission Reductions Fund, say, at a price of \$10-20 per tonne of carbon, such credits could earn NSW a gross income of \$20 to \$40 million a year<sup>3</sup>. The Australia Institute reports that "that native forestry doesn't provide any economic value to the state of NSW, and that citizens of NSW would be \$40 million per year better off if native forests were left alone rather than logged"<sup>4</sup>. Additionally, the environmental benefit would be incalculable.

We note that the forestry industry has successfully muddied the waters in regards to carbon dynamics in logged native forests by claiming that logged forests absorb more carbon than intact forests. However, peer-reviewed literature by researchers at Australian National University clearly demonstrates that this is not the case<sup>5</sup>. So-called 'grey literature' should not be given the same weight as rigorously reviewed research.

We are quite alarmed at the suggestion that the contradictory concept of 'sustainable forest harvesting' and 'avoided forest harvesting and improved forest management' is considered to be an integrated option. The misleading jargon of 'sustainable forest harvesting' obfuscates the truth. The damage wrought to habitat, water and topsoil is inestimable in dollar terms—they are priceless elements of the natural capital asset. A regenerating logged forest could perhaps recoup old growth status, habitat, water and topsoil in about 500 years. It takes at least 100 years for tree hollows to form for gliders, owls and other forest dwellers.

### Economics

Your National Parks pilot project echoes the principles of the Great Southern Forest proposal in respect that carbon could fund jobs in forest landscape restoration, wildlife protection, fire preparedness and nature-based tourism and help Australia meet its carbon emission reduction targets. The Australia Institute's 2016 research<sup>6</sup> found that Forestry Corporation of NSW lost \$79 million over the past seven years. This proves that Forestry Corp. is not economically trustworthy for future successful forest management initiatives. The logging sector for woodchips is unprofitable and, like koala pelts and whaling, has had its day. It is imperative to show responsibility to our obligations under the Kyoto and Paris protocols and to conserve our natural environment.

We suggest that the State Government develops an entirely new strategy for native vegetation management across the State. Experts and scientists from the organisations who endorse the principles of the Great Southern Forest would certainly like to be a part of this conversation. In the meantime, we recommend an immediate halt to native forest logging in the Southern Forest Region until a strategy is determined to protect climate and iconic wildlife, and create jobs using the natural capital asset of stored carbon in forests which is daily being destroyed: it's like throwing money away.

### Regional Forest Agreements

The RFAs were primarily wood supply agreements and environmental considerations were always secondary. They have failed dismally in all of their aims—including economic security—and should not be renewed<sup>7</sup>. It serves no-one's interests to simply ignore the evidence of failure and, with minor concessions, renew the RFAs.

RFAs are an outdated framework for forests. The RFA process was negotiated before general recognition of climate change and carbon economics. In the increasingly urgent context of climate disruption, forests are a vital living dynamic for drawing down atmospheric carbon dioxide, sequestering it as terrestrial carbon while generating oxygen. These three actions are relevant in our current times, for the nation and for the planet.

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[contact@greatsouthernforest.org.au](mailto:contact@greatsouthernforest.org.au)

What is called for is a completely new framework for managing our public native forests. A framework which prioritises carbon sequestration, and supports the role forests play for a stable climate and for the many natural, cultural and social benefits.

Can you please advise us of the Commonwealth Government's response to the NSW Government asking that priority be given to developing new Emissions Reduction Fund methods related to forestry?

We have seen the destruction with our own eyes. We have seen Forestry Corp. logging bury wombat burrows, destroy glider and owl habitat, and fell koala trees. We have seen an Aboriginal man being penalised for trying to protect sacred land, we have seen community members from all walks of life gather to protest against the destruction of our public forests. We have recorded breaches committed by the logging sector and we know of the economic and environmental loss of logging our forests for woodchips.



yellow bellied glider deceased from logging.



logged tree hollow wildlife habitat. photo B Somerset



blocked entrance to wombat burrow. photo B Somerset

The Great Southern Forest team welcomes this opportunity to present our preliminary case for how our forests should be managed. The community views forest management from the ground and is implicitly and deeply affected by these issues. Forest destruction as we have seen, damages the human spirit. Environmentally conscious Australian citizens need to be assured that current 'business as usual' is at an end.

In our shared concern for the south east public forests, we welcome further discussions with you. Please email us at: [contact@greatsouthernforest.org.au](mailto:contact@greatsouthernforest.org.au)

Kind regards,

Dr Bronte Somerset & Dr Rosemary Beaumont, Great Southern Forest

Daisy Barham, Campaigns Director, Nature Conservation Council

Kevin Evans, CEO, National Parks Association NSW

Brief: [http://www.greatsouthernforest.org.au/media/GSF\\_Brief.pdf](http://www.greatsouthernforest.org.au/media/GSF_Brief.pdf)  
Resource materials: <http://www.greatsouthernforest.org.au/resources.html>

<sup>1</sup> Somerset, B. (2016) *Murrumbidgee Reserve Protects Koalas: but at what cost?* National Parks Association Nature NSW 60:2 pp. 8-9.

<sup>2</sup> Perkins, F., Macintosh, A. (2013). *Logging or carbon credits*. The Australian Institute. Technical Brief No. 23, June 2013, ISSN 1836-9014. <http://www.tai.org.au/content/logging-or-carbon-credits>

<sup>3</sup> Perkins, F. & Macintosh, A. (2013). <http://www.tai.org.au/content/logging-or-carbon-credits>

<sup>4</sup> Campbell, R & McKeon, R. (2016). *Money doesn't grow on trees*. The Australia Institute. <http://www.tai.org.au/content/money-doesnt-grow-trees>

<sup>5</sup> Keith H, Lindenmayer D, Macintosh A, Mackey B (2015) *Under What Circumstances Do Wood Products from Native Forests Benefit Climate Change Mitigation?* PLoS ONE 10(10): e0139640. doi:10.1371/journal.pone.0139640

<sup>6</sup> Campbell, R. & McKeon, R. (2016). <http://www.tai.org.au/content/money-doesnt-grow-trees>

<sup>7</sup> Sweeney, O.F. (2016). *Regional Forest Agreements in NSW: have they achieved their aims?* The National Parks Association Inc of NSW, Sydney.

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