



FORESTS – COMPELLING MESSAGES

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Forests are worth more standing – for safety, economy and biodiversity

SAFETY

Logging makes fires worse. Fire moves quicker and burns hotter in logged forest because:

- large quantities of debris are left on the ground (up to 450 tonnes per hectare);
- regenerating areas have young, short, even-aged and densely packed trees;
- logged forests lack the moist parts of older forests like tree ferns; and
- logged forests are fragmented by logging coupes and logging roads making them drier.

Continued logging under the new climate-worsened fire regime endangers people. In Eurobodalla and Bega Valley shires most of the main population centres are surrounded by currently logged State forests, especially to the north and west directions from each town centre from which the worst fires come. See the maps at Appendix 1a & 1b and more information about logging making fires worse at Appendix 2.

ECONOMY

Eurobodalla and Bega Valley State native forests are worth more standing. They generate more employment unlogged as carbon sinks and in nature-based tourism.

The November 2021 report [*Comparing the value of alternative uses of native forests in Southern NSW*](#) by Frontier Economics and Professor Andrew Macintosh found that there is **greater economic benefit from ceasing native forest harvesting in the Southern and Eden forest regions of NSW than continuing the activity.**¹

1. **The benefits over thirty years of ceasing native forest harvesting are higher than the costs by \$62 million.**
2. **The annual net greenhouse gas abatement is 0.95 million (950,000) tonnes CO₂-e for the next 20 years.**²
3. **The no native forest logging scenario would generate significant abatement** estimated to be 3.4 times more abatement per year over this period than any single one of the largest existing Commonwealth Emissions Reduction Fund (ERF) projects, demonstrating its potentially significant role in emissions abatement.
4. **The current low financial return (\$2.3 million p.a. over the five years to 2020) to the public on their State native forest asset indicates the extent the profitable**

¹ Frontier Economics and Prof. Andrew Macintosh, ANU. Nov 2021. *Comparing the value of alternative uses of native forests in Southern NSW*. <https://www.frontier-economics.com.au/comparing-the-value-of-alternative-uses-of-native-forests-in-southern-nsw/>

² Ibid p.9 <https://www.frontier-economics.com.au/documents/2021/11/comparing-the-value-of-alternative-uses-of-native-forest-in-southern-nsw.pdf/>

plantation sector underwrites the costs of the native forest hardwood industry. Unfortunately, financial data relating to the native forest business alone, and in individual Regional Forest Agreement regions is not published. Greater transparency is needed about the true financial position of NSW native forest logging to support similar informed policy-making. In 2020-2021 NSW Forestry Corporation Hardwood Forest Division posted a \$20 million loss overall in its [Annual Report](#).³

5. At the current ERF price of \$17/tonne, 950,000 tonnes CO₂-e of **net abatement would be worth \$16 million p.a.** If sold on international carbon markets it would be worth many times this. The European price is 80 Euro per tonne.
6. Native forest logging employs only 0.1-1.6% of total workforce depending on LGA, and the **employment impact from ceasing to harvest native forests in the Southern and Eden RFA areas would be small**, particularly as logging contractors and drivers already work in pine plantations as well as native forests. A viable plantation industry plan as recommended in the Frontier Report would see forestry contractors working 100% in plantations. The woodchip mill also has a plantation as well as a native forest woodchip pile so can switch 100% to plantation chips. There are credible, alternative employment opportunities to increase jobs in forest management for carbon and recreation.

The argument cannot be sustained that logging is a historically nation-building therefore currently necessary industry. While acknowledging the key role that native forest logging played in building national infrastructure – piers, bridges, power poles, rail tracks, homes and larger buildings - over the last two centuries, that role is no longer there. Almost all of that previous timber requirement has been supplanted by concrete and steel in larger infrastructure and by softwood pine in domestic construction.

Nor can the argument be sustained that native forest logging is a ‘traditional’ industry and should therefore be protected. A number of traditional industries have been discontinued in Australia on environmental and/or economic grounds. Whaling and vehicle manufacture have ceased. Grazing of cattle and sheep on public alpine lands has ceased. Commercial fishing on NSW south coast has also been substantially shrunk as an industry by sensible government policy.

The Frontier Economics/Macintosh modelling of jobs benefits is consistent with earlier research.⁴

It is further bolstered in 2021 by *Great Southern Forest* (www.greatsouthernforest.org.au), who argue that jobs in logging, saw milling of public forest hardwoods and NSW Forestry Corporation services supporting these activities can be more than replaced by jobs requiring similar skillsets in carbon assessment, forest management, weed and feral animal control, wildlife preservation and nature-based tourism.⁵

³ https://www.forestrycorporation.com.au/data/assets/pdf_file/0012/1376877/forestry-corporation-annual-report-2020-21.PDF p.13

⁴ Perkins, F. Macintosh, A. June 2013. *Logging or carbon credits: Comparing the financial net benefits of forest-based activities in NSW's Southern Forestry Region*. Technical Brief No. 23. ISSN 1836-9014. The Australia Institute. <https://australiainstitute.org.au/report/logging-or-carbon-credits/>

⁵ Great Southern Forest Steering Group. 17 April 2021. Submission No. 3 to the NSW Parliamentary Inquiry into Long Term Sustainability and Future of the Timber and Forest Products Industry. https://www.parliament.nsw.gov.au/lcdocs/submissions/70976/0003_Great_Southern_Forest_Steering_Group.pdf

A key statistic driving this job creation is the strong demand for nature-based tourism with 68% of international tourists to Australia looking for a nature experience.⁶

In terms of domestic tourism, the Mogo Adventure Trail for mountain bikers would be a significant boost for nature-based tourism growth based on the experience of Derby in Tasmania.⁷ In Eurobodalla and Bega Valley shires we can expect at least as much strengthening in nature-based tourism given our proximity to large mainland populations, warmer climate and high regional natural values.

Lastly, to counter the common impression that logging State forests is a significant employer, it is useful to compare timber industry employment with accommodation and hospitality employment which is largely dependent on tourism in NSW. See Appendix 3 to evidence this statistically. Bear in mind that much of the Snowy Monaro and Snowy Valleys and some of the Bega Valley employment is associated with plantation softwood employment not native forest.

BIODIVERSITY

Biodiversity is greatest and most climate resilient in primary forests.

‘Primary forests’ include old growth forests and forests that have regenerated 100 years or more after last logging.

The authoritative *NEXUS Report* warns,

Primary forests and coastal ecosystems are the highest priority. These ecosystems play the largest potential role in climate mitigation and adaptation, slowing biodiversity loss, and reducing risk of future zoonotic pandemics. They are also the ecosystems facing the fastest rates of degradation and loss. If we lose these battles, we lose the war.⁸

Prior to the Black Summer 2019-20 fires, Australia had lost nearly 40% of its forests. In 2012, Professor Corey Bradshaw said,

The most important implications of the degree to which Australian forests have disappeared or been degraded are that management **must emphasize the maintenance of existing primary forest patches, as well as focus on the regeneration of matrix areas between fragments to increase native habitat area, connectivity and ecosystem functions.**⁹

But now the Black Summer fires have changed so many things for the worse. Threats to Eurobodalla ecosystems are now obvious to us all. In its own submission to the Australian Senate Eurobodalla Shire Council said,

⁶ Great Southern Forest Steering Group. Ibid p. 3

⁷ <https://www.abc.net.au/news/2017-12-26/mountain-bike-trails-driving-major-change-in-derby/9276384?nw=0>

⁸ Barber, C.V., R. Petersen, V. Young, B. Mackey, C. Kormos. 2020. *The Nexus Report: Nature Based Solutions to the Biodiversity and Climate Crisis*. F20 Foundations, Campaign for Nature and SEE Foundation. P. 1. <https://www.foundations-20.org/wp-content/uploads/2020/11/The-Nexus-Report.pdf>.

Note: Co-author Virginia Young is a board of *Great Eastern Ranges* (www.ger.org.au)

⁹ Corey J. A. Bradshaw, *Little left to lose: deforestation and forest degradation in Australia since European colonization*. *Journal of Plant Ecology*, Volume 5, Issue 1, March 2012, Pages 109-120, <https://doi.org/10.1093/jpe/rtr038>

The 2019-20 fires burnt approximately 80% of the Eurobodalla landmass including **90% of its national parks and state forests**¹⁰

One, let alone, repeated bushfires of Black Summers' scale and severity will accelerate already high biodiversity loss. Citing the journal *Nature* in 2017, *The Conversation* reported,

Australia is among the top seven countries worldwide responsible for 60% of the world's biodiversity loss between 1996 and 2008.¹¹

On top of earlier biodiversity loss across Australia, including in South East NSW, the Black Summer fires killed nearly 3 billion native animals and we are in grave danger of further extinctions in Eurobodalla, for example, of the Swift Parrot.^{12 13} The project to re-establish koalas in Eurobodalla is also that much more difficult owing to extensive burnt forest and continued logging.¹⁴

Given this grim situation, the NSW Environment Protection Authority (EPA) issued additional condition for logging bushfire affected forests to protect their severely compromised biodiversity and ecosystem integrity.¹⁵ Subsequent to their issue, NSW Forestry Corporation chose to side-step the new EPA rules and resume logging on its own environmentally weaker terms. The legality of this move by Forestry Corporation remains at issue.¹⁶ The recently leaked Natural Resources Commission Cabinet in Confidence *Coastal IFOA operations post 2019/20 wildfires* report recommended:^{17 18}

- Significant restriction of forestry operations in fire damaged forests on the South Coast.
- Ceasing logging for three years in the Nowra and Narooma management zones, where logging was identified as posing an "extreme risk" to environmental values.
- Protecting 75% of the forest in the Batemans Bay and Eden Management Zones, which were identified as 'high risk', through additional measures and restrictions for operations.

Yet logging continues in Mogo, Currowan and Shallow Crossing State Forests without 75% of the Batemans Bay zone protected and logging is planned in Bodalla State Forest and imminent in Dampier State Forest in the Narooma management zones.

¹⁰

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Finance_and_Public_Administration/Bushfire_recovery/Submissions (Submission No, 23)

¹¹ <https://theconversation.com/australia-among-the-worlds-worst-on-biodiversity-conservation-86685>

¹² <https://www.theguardian.com/environment/2019/mar/30/record-numbers-of-australias-wildlife-species-face-imminent-extinction>

<https://www.wwf.org.au/news/news/2020/3-billion-animals-impacted-by-australia-bushfire-crisis#gs.mmve26>

¹³ <https://www.abc.net.au/news/2021-06-01/swift-parrot-logging-ban-call/100180868>

¹⁴ <https://eurokoalas.files.wordpress.com/2021/04/draft-recovery-strategy-revised-edition.docx.pdf>

¹⁵ <https://www.epa.nsw.gov.au/your-environment/native-forestry/bushfire-affected-forestry-operations>

¹⁶ <https://www.theguardian.com/australia-news/2021/feb/17/logging-to-resume-in-bushfire-affected-forests-on-nsw-south-coast-despite-environmental-warning>

¹⁷ [Final Report Coastal IFOA operations post 2019/20 wildfires](#) NRC June 2021

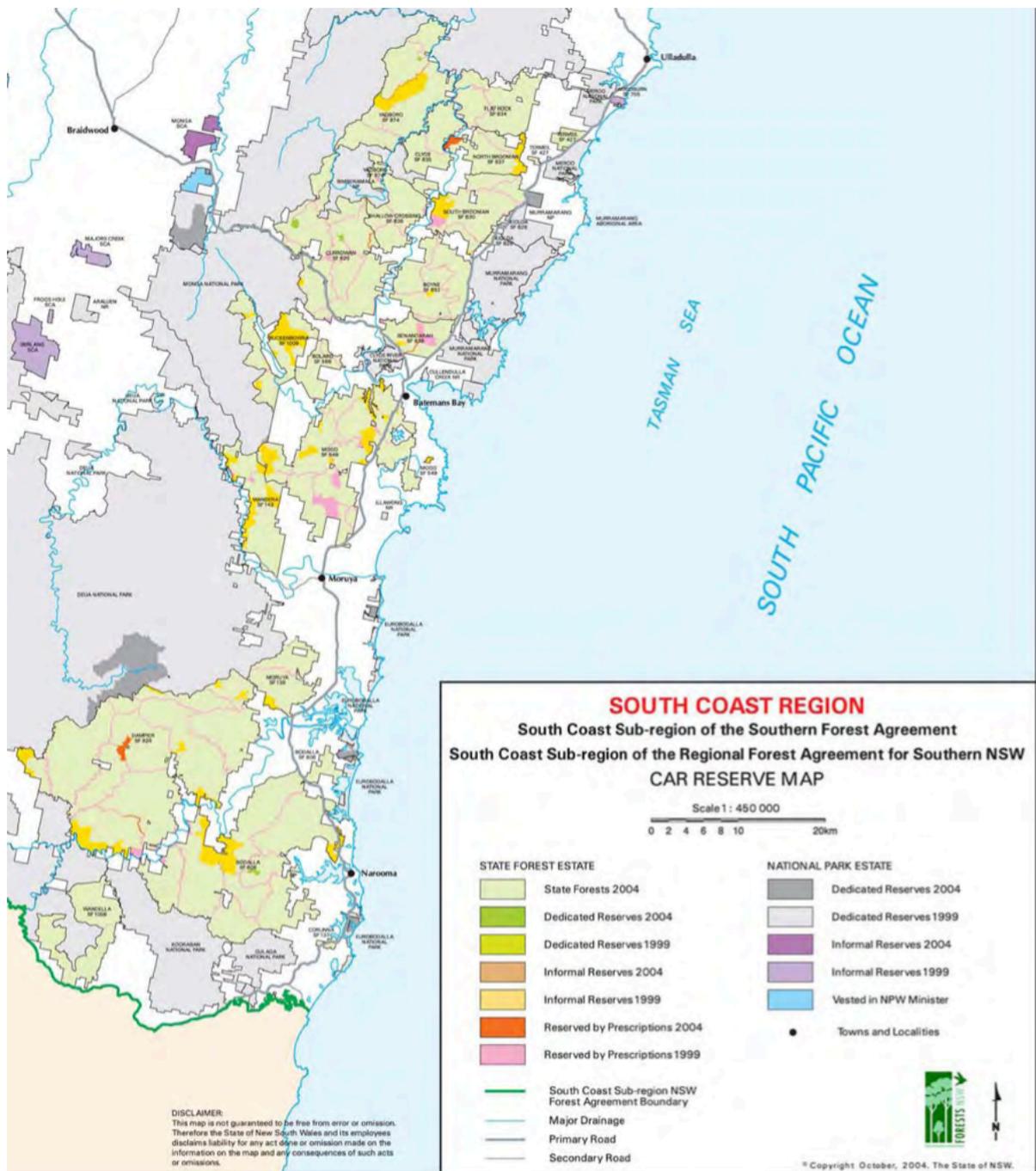
¹⁸ <https://www.beagleweekly.com.au/post/south-coast-logging-should-stop-immediately-following-nrc-report-into-logging> published 26/11/2021

We need to stop logging our native State forests to give our biodiversity the best chance.

CONCLUSION

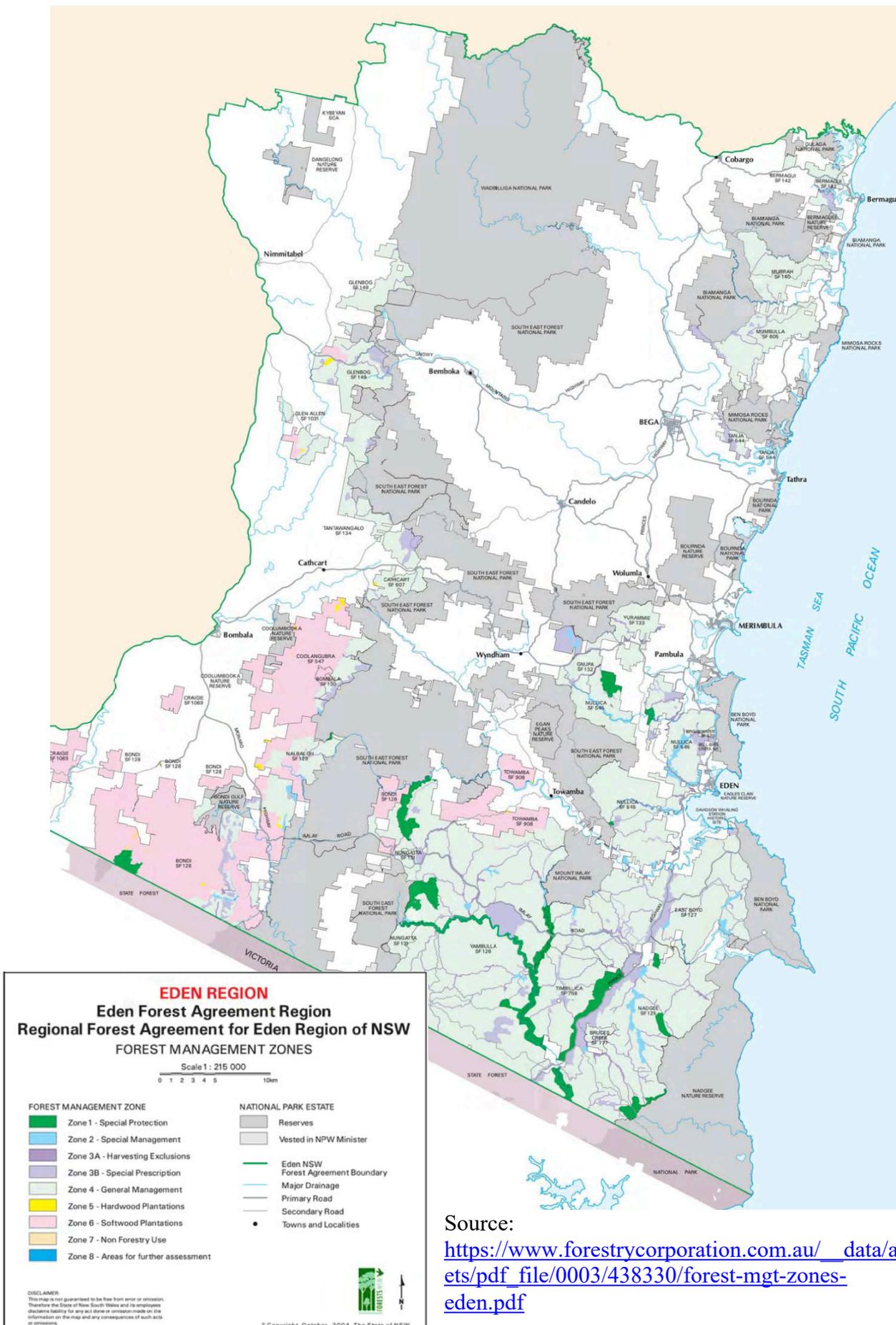
State forests are a public asset and a significant land use with 22% of Bega Valley shire Council and 31% of Eurobodalla shire being State Forest. Bega electorate constituents live close by our State native forests and what happens in them matters to our safety, local biodiversity and to our economy. Our safety will be increased, our economy stronger and the biodiversity for which we are guardians better protected if we stop logging our south east NSW native State forests.

Appendix 1a: State forests in Eurobodalla shire



Source: http://www.forestrycorporation.com.au/_data/assets/pdf_file/0009/438363/car-reserve-map-south-coast.pdf

Appendix 1b: State forests in Bega Valley shire



Source:
https://www.forestrycorporation.com.au/data/assets/pdf_file/0003/438330/forest-mgt-zones-eden.pdf

Appendix 2: Logging makes fires worse

Did you know?

Fire moves quicker and burns hotter in a logged forest. It's because:

- Large quantities of debris are left on the ground (up to 450 tonnes per hectare).
- Regenerating areas have young, short, even-aged and densely packed trees.
- Logged forests lack the moist parts of older forests like tree ferns.
- Logged forests are fragmented by logging coupes and logging roads making them drier.

Has this really happened?

Yes. Of the one million hectares burnt over 2019-20 in East Gippsland, 36% had burnt at least once before in the last 25 years. However, the moist forests native to this area should only burn once every 50-150 years.

What to do?

- Stop logging areas of native forests especially near human settlements.
- Reduce fragmentation to build resilience to future fire events.
- Protect undisturbed or lightly disturbed areas as these are fire refuges for many species.
- No post-fire 'salvage' logging that can impair recovery and make regenerating forests more prone to further fires. Repeated fires risk ecosystem collapse as young trees die and older trees fail to re-sprout or produce seed.
- To maintain employment and timber supply focus forest industries on plantations.

Logging makes fires more frequent and more severe!

Forests and Climate Change

Now is the time for policy makers to look after the critical values of intact native forests. In these forests:

- Fire severity is lowest
- Species persistence during fires is greatest
- Rates of recovery after fires are highest.

Unlogged forests are more resilient to the higher temperatures and worsening droughts brought by climate change. They store more carbon and are proper homes for the nature we love.



Sources:

Lindenmayer, David B. et al. Recent Australian wildfires made worse by logging and associated forest management. *Nature Ecology and Evolution*. 2020 July;(4):898–900
Watson, J.E.M. et al. The exceptional value of intact forest ecosystems. *Nature Ecology and Evolution* 2, 599–610 (2018)
Taylor, C. et al. Nonlinear Effects of Stand Age on Fire Severity. *Conservation Letters*, July/August 2014, 7(4), 355–370

Appendix 4: Logging, timber processing and timber manufacturing vs accommodation and hospitality jobs in the LGAs of South East NSW, 2016

 Australian Bureau of Statistics									
2016 Census - Employment, Income and Education Industry of Employment (INDP) - 4 Digit Level by LGA (UR) Counting: Persons Place of Usual Residence									
Filters:									
Default Summation Persons Place of Usual Residence									
LGA (UR)	Bega Valley (A)	Eurobodalla (A)	Kiama (A)	Queanbeyan-Palerang	Shoalhaven (C)	Snowy Monaro Regional (A)	Snowy Valleys (A)	Yass Valley (A)	Total
INDP - 4 Digit Level									
Forestry and Logging, nfd	3	0	0	0	0	3	3	0	8
Forestry	26	14	4	9	9	25	99	3	193
Logging	66	19	0	5	6	34	115	0	246
Forestry Support Services	18	11	6	0	14	12	43	4	114
Wood Product Manufacturing, nfd	3	0	0	0	5	6	22	0	30
Log Sawmilling and Timber Dressing, nfd	11	4	0	0	7	36	26	0	81
Log Sawmilling	36	17	0	20	58	40	197	0	374
Wood Chipping	0	0	0	0	0	0	0	0	3
Timber Resawing and Dressing	4	0	0	3	0	0	127	0	136
Other Wood Product Manufacturing, nfd	0	0	4	0	8	0	4	0	16
Prefabricated Wooden Building	0	0	0	0	0	0	0	0	0
Wooden Structural Fitting and Component	19	42	12	101	88	9	5	6	280
Veneer and Plywood Manufacturing	0	0	3	0	0	0	0	0	3
Reconstituted Wood Product Manufacturing	0	0	0	0	0	0	35	0	41
Other Wood Product Manufacturing nec	0	0	3	0	6	0	0	0	21
Accommodation and Food Services, nfd	8	10	4	0	12	13	5	0	49
Accommodation	411	427	167	210	752	675	108	103	2851
Food and Beverage Services, nfd	44	36	16	42	97	34	9	16	286
Cafes, Restaurants and Takeaway Food	0	8	0	5	10	0	0	0	33
Cafes and Restaurants	339	404	327	489	1001	317	74	158	3118
Takeaway Food Services	209	193	128	407	722	127	81	149	2027
Catering Services	24	20	3	93	107	24	9	13	294
Pubs, Taverns and Bars	97	59	50	143	251	97	60	54	812
Clubs (Hospitality)	275	259	125	164	555	53	55	54	1534
Nature Reserves and Conservation Parks	41	28	9	26	78	71	44	4	291
Not applicable (not employed)	20098	24254	11982	26637	63323	10353	8406	8065	173118
Total	33254	37229	21466	56027	99649	20216	14398	16143	298388

Data Source: Census of Population and Housing, 2016, TableBuilder

INFO Cells in this table have been randomly adjusted to avoid the release of confidential data. No reliance should be placed on small cells.

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