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The Australian Department of Agriculture

<https://haveyoursay.awe.gov.au/national-farm-forestry-strategy>

SUBMISSION

on input into the formulation of a National Farm Forestry Strategy

Introduction

The Clarence Environment Centre has maintained a high-profile presence in the Clarence Valley region of northern NSW for 35 years. The conservation of Australia's natural environment, both terrestrial and marine, has always been a priority for our members, and we believe the maintenance of healthy ecosystems and biodiversity is of paramount importance to the survival of humans in earth.

During that time our various members have engaged in and contributed actively and pro-actively to ensuring the protection of native forests, while encouraging programs that help provide a sustainable supply of timber for society's needs. In that respect forestry, and the unsustainable practices that have occurred over the past 200 years, which have led to the situation we face at this point in history, has been an enormous concern.

Summary.

We see the proposed preparation of a National Farm Forestry Strategy as an opportunity to make a significant contribution to Australia's aim for net zero carbon emissions, while enhancing critically important biodiversity. To achieve this, we need to change cultures that have developed over the past 200 years, which have led to unsustainable forestry practices that have devastated biodiversity across the country. We therefore believe:

- Farm forestry should not be solely about timber production, Alternative income streams, carbon sequestration perhaps, must be created that encourage reforestation.
- The Strategy should look at ways to protect remaining native forests for wildlife habitat, and biodiversity enhancement. After all, biodiversity provides us with everything we eat, much of what we wear, and many of the medicines we humans need to survive. Forests also provide the oxygen we breathe, and the clean water we drink, the two essential elements for life on earth.
- Genuine sustainability must be at the core of the strategy.

- Plantation establishment must never be at the expense of native vegetation as is currently allowed.
- Where monoculture plantations are established. Clear-fell operations must be staged, using strip harvesting across the land contours to avoid erosion.
- Timber must not be grown for the purpose of burning, i.e., biomass.
- Best practice soil conservation practices must be established, and enforced.
- Where cattle grazing and private native forestry coexist, measures must be in place to exclude livestock from waterways to avoid stream bank degradation, erosion, and diminished water quality. Livestock must be removed in times of drought, before all ground-cover vegetation is stripped away by over-grazing.
- Fire management is crucial. All possible measures should be employed to exclude catastrophic fire, but not through regular hazard-reduction burning which we now know increases the flammability of forests, increases erosion, and reduces soil quality. Fire management needs to be a whole of government approach, using a highly trained, professional fire-fighting force, with rapid response capability, backed by all the latest available technology. Never again can we afford to allow fires to run out of control as they did in 2019-20.
- Governments also need to take the lead to reduce the demand for timber. Fence palings, decking, board walks, and many similar structures, can be constructed using alternative recycled materials. Timber recycling should also be prioritised, rather than it being burned or tossed into land-fill.

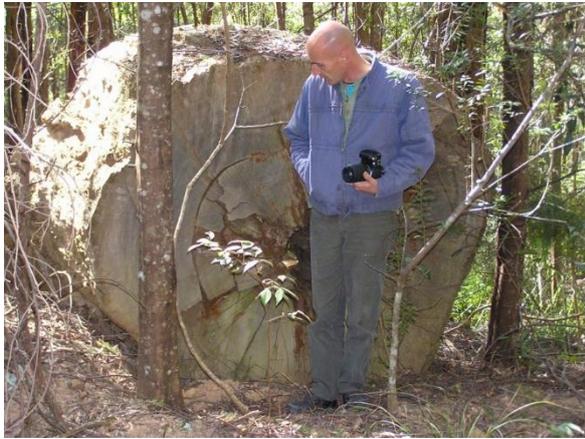
Preamble.

In this region, that history of unsustainable logging began in the 1840s with the lure of Red Cedar. It took the industry just 50 years to reduce that species to virtual extinction, and the current tenuous position from which the once majestic Cedar is unlikely to ever recover.

The following 50 years saw the industry repeat that onslaught on dry rainforest communities across the North Coast, this time targeting the giant Hoop Pines for box wood! Today, those once magnificent lowland rainforests have declined to the point where they are now listed as endangered at both state and federal levels.

Following the invention of cardboard cartons after the second world war, the timber industry turned its attention to Australian hardwoods, the tall Eucalyptus forests which once dominated the north coast. Those early years saw the logging of forest giants up to 3m diameter, that were likely a thousand years old, all the time claiming that what they were doing was sustainable, pointing out that trees grow back.

Up until recently, before the climate change driven bushfires destroyed most of the evidence, an observer could trace the history of logging from old stumps and discarded off-cuts, gradually declining in diameter from those 2-3m wide weathered remnants from 80 years ago down to the 40-to-50-centimetre saplings that are routinely logged today.



These images provide evidence of what was logged in the past, compared with the saplings available today.

The industry's response to accusations of bad forest management will be that this all happened in the past and is no longer the case today. However, the reality is that even after the signing of the Regional Forests Agreements in 2000, which was supposed to lead to sustainable native forest logging, the carnage has continued.

Financial losses incurred by Forests NSW, and latterly by Forestry Corporation, has forced a huge reduction in forest maintenance in fields such as thinning and weed control, to the point where forests have become a bushfire flash-point. **Given the wealth of scientific evidence now available, we all must acknowledge that forest mismanagement was a major contributor to the horrific 2019-20 bushfire disaster.**



Not only did those fires take toll of human lives, livelihoods and habitation, and obliterate millions of wild animals in the process, but large swathes of forest are now dead. However, even that has not been enough to dissuade the industry, which, once again, has returned with a new 'saviour' in its sights - biomass, turning unmerchantable "defective" trees into a new income stream.

Since 2000, all public forests have been logged unsustainably, initially through interpretation of rules that were not in the spirit of the regulations (e.g, calculating average logging rates across a compartment, then only logging half the area, but doubling the logging rate, leaving a devastated landscape akin to a clear-fell operation. In most cases the other half of the compartment was treated similarly within the decade.



Virtual clear-felling at Wedding Bells state forest under single tree selection protocols

This heavy logging in Wedding Bells State Forest was allowable (permissible), with logging in the other half of the compartment delayed, enabling the logging rate across the entire compartment to average under the allowable 40%

When this manipulation of regulations became too blatant, State Government revised the Integrated Forests Operation Approval to include approval to actually clear-fell some forests and relax other measures so logging areas could be expanded, such as by reducing buffer zones along drainage lines and water courses. This in turn has had a significant negative impact on water quality in the Clarence Valley. In early 2021 the Coffs Clarence Regional Water authority was unable to extract water from the Nymboida River for several months due to turbidity problems.



Tall forests of the Dorrigo Plateau have largely been spared the impacts of catastrophic fire until now, so dead trees survive for many decades. When viewed from afar, they can be seen towering above the canopy, silent sentinels, providing evidence of where the forest canopy used to be, 10m-20m above where they are today. This clearly demonstrates the unsustainable nature of logging practices which must change.

And so it continues; and now, “*The National Farm Forestry Strategy is being developed to help build Australia’s future wood resources*”. **It would have been good to see words like “carbon sequestration” or “biodiversity” included, but given the current government’s record on climate change action, their absence is unsurprising. Nevertheless, we earnestly urge that serious consideration be given to their inclusion.**

Private Native Forestry (PNF)

To this point we have concentrated on the historical aspect of the timber industry, focussing mainly on state forests to provide context to what is happening today. Why? Because the same, and in many cases worse, has been occurring on privately owned land. except there has been virtually no enforcement of controls placed on PNF by a code of practice a decade ago.

Added to that is the fact that many bush properties also run cattle, which have their own environmental impacts, soil compaction, creek-bank degradation, soil erosion, pollution of waterways, and the introduction and spread of noxious weeds, to name a few. Also, allowances provided to farmers by what are referred to as Routine Agricultural Management Activities (RAMAs), despite no actual agriculture taking place in many cases, is the annual burning off of bushland areas to encourage green pick for those cattle. High fire frequency alone is a recipe for extinction of many native plant species. It also effectively removes all humus from the soil, and kills off microbial activity, which should be retaining moisture in mulch and providing a barrier to rainwater run-off and erosion.

Things have to change, and the proposed strategy has the potential to provide an opportunity for this to occur. Careful consideration must be given to the needs of the wider community, including an expectation of cleaner air and water. i.e., less smoke in the air and turbidity in the water!

Firstly, the need for forests in the critical struggle to combat climate change must be placed front and foremost. No longer can we afford to introduce feel-good tree-planting exercises while still condoning broad-acre, ball and chain land clearing operations to increase the world's numbers of methane belching cattle.

Also, the Strategy must be formulated to consider the greater good; not just ways to reduce red tape for farmers who always claim to be doing it tough. Given that whatever landowners do on their land has the potential to impact on those living downstream, this means they have a responsibility to others in the community. It is, after all, those others who pay the taxes, which are now more than ever in continual demand to compensate landowners for the impacts of drought, fire, flood, mice plagues, and any other pestilence directly caused by human actions.

This is not to say landowners should not receive incentives to ensure the environmental protection that nature deserves. They should. **In fact, every possible income generating alternative to logging should be considered, or even created, as a part of this new Strategy.**

Plantations are at the forefront for consideration under the new Strategy, and no doubt the urgent need for more carbon sequestering trees will be used to justify focussing on this branch of forestry. This tactic was used by the Howard Government early this century, which allowed a 100% tax deduction for tree planting, **and what a disaster, and missed opportunity that turned out to be.**

We must learn from our mistakes. Current regulation that allows 30 year-old native forest and older-growth remnants to be bulldozed to accommodate new plantations is unacceptable, and must be changed.

Likewise, any tax-payer funded incentives must be designed to exclude rogue operators, who are sure to emerge as soon as they smell money. Again, that lesson must be learned from the Howard era debacle, that saw thousands of hectares of native forests bulldozed, millions of dollars defrauded, and trees planted that were unsuited to the environments in which they were planted, had no commercial value, and in many cases were ultimately also bulldozed and burned just to get rid of them.

Even under the current PNF code of practice, landowners are running out of timber to supply the demand, mainly due to a century and more of poor soil management, resulting in a dramatic drop in yield. We believe that tree growth rates projected by the industry, providing landowners with an expectation that single tree selection on a 20-30-year logging rotation can remain sustainable, are wildly optimistic. Add to this the surge in demand that is leading to over-logging, and PNF operators are now also looking at the biomass alternative that allows them to sell under-sized or previously non-merchantable trees, or non-timber species, because they find themselves with no alternative income stream.

This situation must be addressed by the Strategy, with a strong focus on soil health. For example, if livestock are to be part of a farming operation, creek banks must be protected to prevent loss of topsoils. Also, cattle should always be removed during drought, (i.e.,) before the land is overgrazed and before the soils are left bare. These are basic, common-sense strategies that help farming to become sustainable, but hardly anywhere is this occurring.

There is also a widespread attitude among landowners that, because they own the land, they should be allowed to do what they want with it. Many appear determined to exploit their land to take every last dollar's worth of timber, gravel, sand, bush-rock, native plants, whatever, and then sell it off to developers who will make their money subdividing it up into bush-blocks to tree-changers.

Abuse of the land, and nature, in this fashion should not be allowed. There are regulations in place that could be invoked, but the regulators are reluctant to enforce them. (Perhaps they are afraid of getting shot?)

We have to understand: We cannot continue to take, without giving something back in return. This, we believe, is the real challenge facing those tasked with formulating the National Farm Forestry Strategy.

Please do not let this become just another missed opportunity.

We thank you for the opportunity to comment.

Yours sincerely

John Edwards
Honorary Secretary