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To: General Manager and all Councillors

Development Application (10-2020-81-1) Timber Optimisation Hub by South East Fibre Exports Pty Ltd / Allied Natural Wood Exports (ANWE, now Allied Natural Wood Enterprises), for reconsideration by Council on 14 September 2021.

I herewith state my opposition to this Development Application (10-2020-81-1) which the Council approved on 04/09/2020 then was declared invalid by the Land and Environment Court. The DA seeks approval for additional native forest wood processing facilities at the Eden woodchip mill.

I base my case on why this subsidiary Application should not be approved for the reasons SERCA indicated in its previous submission to Council regarding this application ¹, and, on these facts which are implicit in any decision regarding management of our public native forests.

- The quality and quantity of native forests has changed
- Wildfire likes logged forests
- Our Australian scientists agree: logging should stop
- Wood chipping is a dead loss
- The value of woodchips has plummeted

THE QUALITY AND QUANTITY OF NATIVE FORESTS HAS CHANGED

Forestry Corp. is responsible for management of the State Forests and published that, in the Southern and Eden Regions, around 85% and 80% respectively of the area available for logging was impacted by fires in the summer of 2019-2020 ².

The native forests and all they contain are very different now in quality and quantity to what they were before 2019-2020 bushfires when the chipmill operated as usual. Given the devastation, our public native forests need a change of management which provides for their complete protection. It is illogical and economically and environmentally unwise to think of managing any asset, such as a whole forest, in the same way as one would manage the very little of it that was left intact.

WILDFIRE LIKES LOGGED FORESTS

Intensification of wildfires around the globe has led to consideration of cause, coping and recovery and future mitigation. These fires have impacted lives, livelihoods, homes and the natural environment. It sent chills up my spine to reread an account, and see footage, of the Dunns's Road, Green Valley's and East Ournie Creek's merging blazes, which raged at a catastrophic level last summer on the NSW-Victoria border, and rapidly burnt through some of the most heavily logged forests in Australia. By 11 January 2020, these three fires formed into a 'mega fire' and burnt 800,000ha ³. The names of these places will inevitably remind us of that frightful event and of our reliance on *Fires Near Me* during that terrible time, and of our evacuation to safe places.

In Australia, forest management practices have been queried as a result of our 2019-2020 wildfires. Evidence confirms that these practices are a risk to the community. For the future of Australia's natural landscape and all it contains, it is important to know if logged forests exacerbate wildfire. Yet this is not even **the** most important question to be asked in terms of the impact of climate and extinction emergencies in this, the driest inhabited country on earth.

Natural sciences research inevitably impacts research into the human sciences. So, research is very valuable in terms of our understanding of how we manage the landscape and in turn, how that affects the way we live and manage our own existence.

While driving from Bega to Bateman's Bay recently, roadwork stops gave me the opportunity to actually look right into the forests through which I was travelling. At one stop, the shaded lushness and richness of the vegetation below a thick canopy made me think it may take a handful of heat beads to try to ignite a fire there. Alternatively, the spindly regrowth of logged areas looked to be far more susceptible to wildfire. With a thin ineffective canopy, common sense told me that the amount of moisture this new growth would take from the soil would make the understory drier than older forests with dense shady canopies.

OUR AUSTRALIAN SCIENTISTS AGREE: LOGGING SHOULD STOP

The reputable methodologies of research studies, such as those used by Dr Taylor⁴ and Professor Lindenmayer, to explore the hypothesis that logged forests burn, or do not burn, more easily than unlogged natural native forests led the Lindenmayer team to make the valid conclusion that 'Logging of native forests increases the risk and severity of fire and likely had a profound effect on the recent, catastrophic Australian bushfires'⁵.

Researchers such as those from the University of Wollongong⁶ also attest that: 'Native forest logging makes bushfires worse—and to say otherwise ignores the facts—that the Black Summer bushfires burned far more temperate forest than any other fire season recorded in Australia'.

Researchers such as Michelle Ward⁷, whose work is devoted to understanding our condition in a far more scientific way than by simply staring out of a car's window, actually answers **the** most important question: Why log native forests anyway? She said it was time for the Government to act.

'We urge policy makers to recognise and account for the critical values of intact, undisturbed native forests, not only for the protection of biodiversity, but for human safety. Let's act strongly and swiftly for the sake of our communities, the species they house, our climate and Australia's wild heritage.'

Her comments strengthen the position of the South East Region Conservation Alliance Inc., and my case, that logging of the native forests of NSW must stop. Developing infrastructure is out of step with the current state of the forests and the public will. Resources would be better directed into and managing hard and softwood plantations and supporting workers' transitions into these related industries. Thus, this DA for additional infrastructure which would herald further native forest destruction should be rejected.

WOODCHIPPING IS A DEAD LOSS

The environmental damage from native forest logging alone is severe and extensive. It destroys beauty, and fragile and unique ecosystems, disregards the interdependence between soil, carbon, water and habitat. Tree hollows only begin to appear in eucalypts over 100 years old, yet logging destroys over 70% of hollows in high conservation value native forest areas and the number of hollows-dependent species such as Greater Gliders, Sugar Gliders and White-throated Nightjars has been reduced. Native species' loss is exacerbated by logging of their roaming corridors, and koala numbers are at crisis point here in south east NSW.

Yet, absurdly now, logging of even our burnt forests for woodchips continues; the governments continue to ignore the conclusions and implications of rigorous research. Science and empirical evidence show that, as they regrow, our native forests need to be carefully managed for trees to form the lush dense canopies which will, apart from other environmental advantages, help to disable wildfire.

Conservation organisations in NSW have the same priority: to save Australia's native forests from being logged for woodchips for Asia and for the sector to transition to plantations. It is a travesty that the governments have condoned logging for woodchipping for over 50 years. Scientific and empirical evidence, which find in opposition to the malpractice of wood chipping, are owed respect.

Logging exacerbates more than wildfire. It intensifies the species extinction crisis, soil loss, water loss, canopy loss, and destroys the potential for carbon capturing. At what point, before we can no longer identify the qualities of primitive natural native forests, will the governments outlaw wood chipping?

THE FALLEN VALUE OF WOODCHIPS HAS PLUMMETED

In 1965, the District Forest Director, Ray Hammond, determined in his initial estimate the cost of woodchips should be 7/6d. (75¢) per 100 super foot from saw mill timber waste, and forest waste which was defined as tree heads and butts and damaged or hollowed timber felled for sawmill logs. Fifty years later, this calculation proves that the native forests of NSW are now being sold at 90% less than they were in 1965.

Then, the woodchip industry was founded on the premise that only the leftovers (waste) of sawmill logs would be used. But the demand for chips was not able to be met if the orders for sawlogs didn't provide enough waste. So then, it became a free for all and everything logged was up for grabs as chip, and still is. Chips are worth 90% less now than they were 50 years ago.

Is 50 Years of Woodchipping Enough? Bronte Somerset. 03.12.19.
<https://www.serca.org.au/research/2019/50years.pdf>

The calculation for 2019 follows:

Assuming eucalyptus has a mean wood density of 650kg/m³, if the 1965 cost of eucalyptus sawmill timber was 7/6d (75¢) per 100 super foot, how does that price compare to the Southern Region's record low price for pulp logs of \$3.72 a tonne paid to Forestry Corp. today? The result shows that, in 2019, pulp is earning only 10% of its original 1965 price.

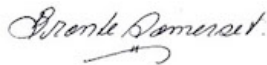
<p>1965: 0.75 ¢/sft (1965 currency)</p> <p>0.75 ¢/sft ÷ 0.002359737 m³/sft x 8.05 ¢2019/¢1965</p> <p>= 2558.55 ¢₂₀₁₉/m³ ÷ 650 kg/m³</p> <p>= 3.94 ¢/kg (2019 currency)</p>		<p>2019: 3.72 \$/t</p> <p>= 0.372 ¢/kg</p>
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Calculation: Kiri Mitchell, 2019.

This confirms that the woodchip industry has been in economic free fall for years and it would long since have ceased to operate if it was a commercial enterprise without government subsidy. That state and federal government politicians continue to support this 'welfare case' industry from the public purse, is irresponsible at least.

The contested practice of logging native forests for woodchips is a conundrum of national importance as the predicted inherent failings when the woodchip industry in southeast NSW was established, align with the present situation which is still neither economically nor environmentally sustainable and works in opposition to the public's moral conscience which demonstrates a need to protect, not destroy.

May the Council apply its collective wisdom and reject this Application to ensure Development, not Destruction.



Dr Bronte Somerset, Secretary, South East Region Conservation Alliance Inc.

<http://www.serca.org.au>

12 September 2021

¹ Attached

² Forestry Corp., 2019-20 Wildfires, NSW Coastal Hardwood Forests Sustainable Yield Review. Dec. 2020, p.6. Table 3: Mapped fire extent on native forest areas available for timber production by RFA region and sub-region.

https://www.dpi.nsw.gov.au/_data/assets/pdf_file/0004/1299388/fcnsw-sustainable-yield-report-2019-20-wildfires.pdf

³ *The mega-blaze: How did it happen and what does it mean?* Janek Drevikovsky. SMH. 12.01.2020.

<https://www.smh.com.au/national/nsw/the-mega-blaze-how-did-it-happen-and-what-does-it-mean-20200111-p53qnr.html>

⁴ Dr Chris Taylor, Research Fellow, Fenner School of Environment and Society, ANU. The study was undertaken by a team from ANU, Macquarie University, University of Queensland, and the Wildlife Conservation Society. *The Conversation*. 25.08.2014. <https://theconversation.com/victorias-logged-landscapes-are-at-increased-risk-of-bushfire-30611>

⁵ Professor David Lindenmayer, Fenner School of Environment and Society, ANU. Lindenmayer has written, or been published in, 765 books, chapters in books and journal articles. ANU, 16.08.2021.

<https://www.anu.edu.au/news/all-news/logging-increases-risk-of-severe-fire>

⁶ Philip Zylstra, Grant Wardell-Johnson, James Watson, Michelle Ward, University of Wollongong. 21.05.2021.

<https://www.uow.edu.au/media/2021/native-forest-logging-makes-bushfires-worse--and-to-say-otherwise-ignores-the-facts.php>

⁷ Michelle Ward, PhD Candidate. University of Queensland, School of Earth and Environmental Sciences. 21.05.2021.

<https://www.uow.edu.au/media/2021/native-forest-logging-makes-bushfires-worse--and-to-say-otherwise-ignores-the-facts.php>