19th Dec 2016

Director, Planning Frameworks
GPO Box 39
Sydney NSW 2001
Online submission to: www.planning.nsw.gov.au/proposals

Dear Sir/Madam,

Submission to the Review of SEPP 44 Koala Habitat Protection
Timber Communities Australia (TCA) makes this submission on behalf of NSW timber communities which are directly affected, and keenly interested stakeholders, on the matter of koala habitat protection.

The mission of TCA is to represent and act in the best interests of communities which are associated with forest and timber sectors in Australia; and to foster a healthy and sustainable future for those communities and their associated forests. Most of our members live in, work in or have a direct association with the forestry communities for whom we provide a voice.

Many of our members have farm forestry plantations. Australian Forest Growers is an affiliate member organisation of TCA.


Among our TCA members are families who have lived in forestry regions for generations, they have a great love of their landscapes and environment and have a vast wealth of current ‘on the ground’ knowledge and historical knowledge about koala populations in their localities.
Forest families take their social good obligations seriously. They operate under stringent regulations and they must be integrally involved in the engagement process for any changes that are being developed which impact on their private native forest (PNF) operations.

Our comments follow:

1. Consultation process
   At the outset we must express dissatisfaction and disappointment about our exclusion as a stakeholder. TCA was not notified or consulted in the process of drafting your review. We had been unaware of the review at all, until it came to our notice at the 11th hour through another party.

   TCA operates a part-time secretariat and due to being unaware of your review until late last week, our submission could not be completed by Friday 16th December. We trust therefore that you will accept this submission.

   As far as we can tell, other key stakeholders like Australian Forest Growers were not notified or consulted, nor Timber NSW, nor other regional based groups within our networks. With respect, this appears to be a serious breach of public service obligations.

   Our three organisations are key stakeholder groups of your initiative and as our members are taxpayers of the NSW jurisdiction we expect to be accorded the respect of inclusion.

2. Timber NSW Submission endorsed
   We understand that Timber NSW made a submission last week. Having had the opportunity to review the submission, TCA conveys that our organisation supports it in its entirety and commends the submission to you.

   It is particularly important that any proposed changes to SEPP 44 within the Dept of Planning are in full alignment with the NSW government’s upcoming review of PNF.

3. Evidence based policy
   It concerns TCA that the premise that the state’s koala populations are in decline is not based on strong evidence.

   Noting the brief time we have had to prepare our submission, our reading of the Chief Scientist & Engineer’s Report of the Independent Review into the Decline of Koala Populations in Key Areas of NSW, Dec 2016 (The Report) is that the evidence is limited to a handful of case studies which have shown mixed results. The case for urgent action or new policies to extend koala habitat protection is not at all clear. This is major issue to be examined transparently with all stakeholders at the outset.

4. Independent third party audited forestry certification
   TCA urges your officers to familiarise themselves with the two independent third party verification (known as forestry certification) systems that are embedded in our modern and responsible forestry sector. Certification requires strict adherence to
best forest management practices, including native fauna habitat protection, in addition to the very strict NSW PNF laws and regulations.

Your review team may not be aware that most NSW native forests (certainly all state owned) are certified under the Australian Forestry Standard, which is approved by the internationally regarded PEFC. The other prominent certification system available in Australia is under the Forest Stewardship Council. This is also is internationally recognised.

TCA understands that some smaller areas of private native forests are AFS and/or FSC certified in NSW.

These existing and highly respected certification systems further support the protection of koalas in the small area of remaining working forests (i.e. the small area left) that is able to be harvested for timber and regenerated; and which provides some remaining source of hardwood timber for the use of our society in construction, flooring, furniture and some paper products.

The trend is for more forest areas to be certified. This provides a rigorous verification to consumers of wood products (which is every single one of us in Australia) that the forest, where the raw material was grown, are managed in a holistic and sustainable way.

We are concerned that your team has full understanding of the voluntary certification processes that modern forest operations use.

If you are not familiar with the two certification schemes, TCA would like to offer to facilitate a meeting between your team and the CEOs of these two certification schemes. We are an active member of both and you will find both of them respected and very progressive schemes.

5. The strategic approach

How the planning arm of government strategically approaches new steps around the protection of koala habitat is of fundamental concern to TCA members.

Going back to basics – the government’s purpose is to serve all the people of NSW. Not only is a ‘whole of government’ approach needed on any matter that impacts on our essential industry (koalas is but one) but a ‘whole of community’ approach is also needed. Active outreach to the relevant stakeholders from the word go, will be far more likely to produce sensible outcomes and avoid perverse outcomes, which our industry has seen time and again.

The NSW Forestry Industry Roadmap, released just a few months ago by the Ministers’ for Environment and Agriculture, contains several specific commitments to provide more certainty for the forestry industry. We trust that the Department of Planning will proceed in a way that is 100% aligned with that.
Our next set of comments relate to the wider context of timber production and koala habitat protection; and the need for a genuine whole of community involvement.

a. Population growth and timber’s environmental advantage for society

There is a rising realisation that, far from being somehow environmentally or socially undesirable, an active and successful and sustainable timber growing sector will help Australia to achieve the lower net carbon emissions future which we desire.

NSW’s population is growing. As reported on your website, it is projected to reach 9.9 million by 2036 which is a 37.5% or 2.71 million increase on 2011 population.

The NSW community will need even more homes, schools, sporting facilities, transport, packaging, paper in order to function.

Being prepared to house, and meet other needs, for a much larger population means NSW will have to have a much smaller carbon footprint per head of population than ever before.

Your website shows the number of dwellings is projected to rise by a massive 30% in the next 20 years - from 3.28 million in 2016 to 4.27 million dwellings by 2036. This will mean NSW consumes more and more building and other materials.

Once upon a time, NSW carried its own weight – growing its own timber supply. In the past twenty years we have gone rapidly backwards. Now, we import more hardwood timber products than we produce ourselves and alarmingly our reliance on tropical hardwood from developing countries continues to grow.

Given the desire of the Australian people to be leaders in reducing global warming, it is poor that Australia doesn’t pull our own weight in timber production. We are not self-sufficient. This is, at best, ironic, and, at worst, a dismal outcome from successive governments’ policies.

Sustainably grown timber has a proven ability to assist in mitigating carbon emissions, yet, in our advanced first world country, production falls short of meeting our own peoples’ needs. Australian farmers grow enough food to feed about 3 times our own population and help feed the world. However, we rely upon other generally poorer countries to provide much of the materials to build our shelter and other timber derived products used every day.

Your website says “We exist to make people’s lives better by making NSW a great place to live and work. We help to provide homes and services, build great communities, create jobs and protect the environment.”

When sourced responsibly, wood can play a big part in helping tackle climate change. This is because wood is a low carbon option for building.”

PLANET ARK
http://planetark.org/campaigns/make-it-wood.cfm
friendly timber materials will be needed between now and 2036. Our NSW public servants and parliamentary representatives alike must consider this fully in carrying out their duties to the people of NSW.

According to Planet Ark, “timber is the only major building material that helps tackle climate change. It is both a naturally renewable and abundant resource.” (Source: http://makeitwood.org/wep/).

It is a policy imperative that our local supply of timber needs to rise. This indeed is one of the pillars of the NSW government’s Forestry Industry Roadmap launched in 2016.

Globally Australia compares favourably as one of the leading countries in terms of being able to produce timber in a sustainable way. In contrast, our publicly owned hardwood estate in NSW has progressively shrunk under so called ‘environmental policies’, including ones aimed to protect koalas.

A successful PNF source of timber is clearly of strategic importance to make up at least some of the lost ground.

SEPP 44 is a complex instrument and we need to encourage existing private native forest owners to continue because their timber is so important for our society and timber takes decades to be ready for harvest.

b. Co-existence is enlightened policy

Contrary to the expectations of some, the creation of more national parks has not ‘saved’ koalas. All the same major threats to them have continued if not escalated – namely bushfires, dogs and road kills with urban encroachment a major threat to prime koala habitat. Bushfires are a particularly sorry tale in National Parks where the build-up of fuel loads and lack of maintained access roads are well known to have contributed to some truly terrible losses of native flora and fauna.

Forestry operations are obligated by law to look after koalas and fire management is very obviously a high priority. They invest considerable time, effort, money and expertise to encourage koalas’ residences and, anecdotally we feel this seems to be paying off.

In stark contrast to the public’s fears, that are a favourite focus of the media, we often hear of ‘good’ koala stories through our network. Being mobile creatures, koalas seem to vote with their feet and are frequently choosing forests where timber harvesting occurs with all the required protections in place. Our assessment is that they are afforded all the privileges of honoured residents and guests, in accordance with our strict regulatory obligations and in accordance with a modern industry committed to do the right thing by society.

TCA does not have funds for our own research, but we have access to a wealth of expertise amid our members and industry networks. We are confident that with higher tech means now available, koala populations and movements will be more reliably monitored throughout the landscape, irrespective of land tenure. As we have better technology, the temptation by government officers to add yet more layers of complexity to land and fauna management should be avoided until and unless there is a clear need to do so.
We have a challenge then. As the NSW urban populations grow rapidly we need more locally produced timber from PNF. This is because the state native forest estate has been progressively removed from harvest access. And we need koalas to be catered for. This dual goal can be achieved and this philosophically must be the starting point for the koala habitat protection planning framework to be progressed.

Locally produced timber has a raft of social good benefits – firstly we have top class farmers in Australia who are quick to adapt and as timber demand is growing, there is potential for more farmers to embed a long term native tree growing element to their business. It can be good environmentally for their farm, can enhance the welfare of their livestock (more shelter etc.) as well as native fauna (such as koalas) and can provide a long term ‘tree crop’ that also produces income which helps sustain farming families and regional communities.

A clever balance will be required to manage the multiple factors.

More than ever before community, industry and government stakeholders all need to be active in the thinking and involved in the solutions. To provide for 10 million people in less than twenty years’ time, NSW needs a thriving, environmentally sustainable private native forestry industry alongside its publicly owned forests.

We raise this because it would be a grave planning mistake if ‘the left hand doesn’t know what the right hand is doing’.

The point is, that in protecting our koala habitat, we have to find a means which is compatible with providing timber resources. This is going to be more important in the coming twenty years than ever before.

As cited on the Timber NSW website, the last twenty years has seen about 50% of all NSW State (i.e. publically owned) forests transferred into National Parks. In 2016 about just 10% of public native forest area remains available for rotational harvesting. This means an increasing importance of the native forest timber resources in private ownership (PNF).

The need for timber materials in NSW is escalating and our State’s ability to be self-sufficient collapsed under prior government interventions. It is a perverse outcome that our own industry was cut in half by deliberate government policies and NSW residents have lost choices to ‘buy local’. Through enacting policies that decimated our own highly regulated, sustainable timber producing regions

“… our wood products offer the nation significant benefits. Our sustainably managed production forests provide important environmental outcomes. For example, sequestering atmospheric carbon and using wood products contribute to a low-carbon economy by displacing fossil fuel-intensive materials and providing carbon-neutral fuel. The forest industry also makes an important socio-economic contribution in many regional communities.”

Forest Industry Advisory Council (FIAC), May 2016
Transforming Australia’s Forest Products Industry Report
and communities, NSW policy makers have created the outcome that consumers are increasingly forced to buy imports.

Timber demand will keep growing. Our houses are filled with imported timber products. The regrettable fact is that, in too many cases, these are not environmentally certified and are produced in a way that is nowhere near as environmentally responsible as Australia does. When you consider the carbon resource then attached to the process of shipping into Australia, it’s a poor state of affairs.

The Australian building code recently changed to allow construction of much higher timber buildings. Lend Lease’s new Sydney skyscraper, the Barangaroo gateway building, is Australia’s newest and most prominent timber skyscraper.

c. Consultation process

To balance the needs of koalas with NSW’s housing and population pressure – your department must seek meaningful input from every relevant stakeholder the whole way through the process.

It is rather disturbing that The Report’s section 1.4 “Community Concerns” discussion refers only to one form of community group – that is koala protection groups. This is a very narrow and very one-sided examination of the NSW community. Our TCA community members are vast in number and have a deep commitment and concern for our iconic koalas. They are involved on a daily basis and seek to ensure a healthy habitat. It is a flaw at the outset to have excluded any views whatsoever from any forest industry stakeholders, as though they are excluded from the definition of ‘community’ in The Report. We urge you to remedy that flaw.

TCA is optimistic about our industry’s ability to be a constructive stakeholder in your planning process. This is because:-
   - the timber producers are highly motivated to protect our community’s iconic species;
   - researchers, our industry and regulators have far better real-time technology for monitoring koalas than in the past;
   - we have a well-regarded Koala Code of Practice for private and public forests, developed by experts through the NSW Forest Industries’ Task Force.

Concluding comments

Australian governments are decades behind the more enlightened thinking and public policies in many OECD countries. For example, across Europe and North America the place of timber is well understood by society and government. People want to grow more timber not shrink their self-sufficiency as Australia has done.

Timber production from PNF and koalas populations can co-exist. This philosophy must be the starting point of policy review given the reality of the human population growth challenge happening in our State. Society wants more timber production and koalas. There is ample proof of successful co-existence.

We would be happy to assist with coordinating a joint introductory meeting with your team together with other forest industry stakeholders. I think you will be pleasantly surprised to see the wealth of commitment to seeing thriving koala populations.
Please do not hesitate to contact me if you have queries about any matters raised in this submission.

Yours sincerely,

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cc
Australian Forest Growers
Timber NSW
Institute of Foresters’ of Australia NSW Chapter