

## Submission to the Review of the Draft Coastal IFOAs.

By [REDACTED] NSW

I make this submission to express my absolute bewilderment at the way the NSW Government, in collaboration with the seemingly misnamed Environment Protection Authority, has sought to blatantly renew the Regional Forest Agreements and change the rules governing logging, in spite of strong and visible community and expert evidence-based responses to the contrary. These changes condone further unacceptable destruction of our publicly owned native forests. If these changes are put into practice, our future generations will condemn us for our stupidity.

The details of the IFOA remake are irrelevant as I firmly believe and have advice to the effect that it have to be scrapped altogether, given their numerous ambiguities, unsubstantiated claims and forecasts based on false facts.

Further, the original RFAs have to be allowed to expire and the timber industry transitioned into a plantation-based operation. What is even more alarming and nefarious is the deceptive ways that these processes have been undertaken, treating the general public as fools and ensuring only a very few dedicated conservationists have even some idea of the overall facts and unreported damage occurring over decades..

For example, the opening statement on your website states *"They also set requirements to achieve ecologically sustainable forest management in NSW."* This is actually a bare-faced misinformation as the EPA knows that these proposed changes spell the end of what little ecologically sustainable forest management that has been practiced in NSW over the period of the RFAs.

It is obvious that complying with the wood supply agreements established at the commencement of the RFAs is the driving force behind continued unecological, unsustainable logging practices - the term 'ecologically sustainable forest management' used in literature and media is totally abused, inaccurate and falsely representing their industrial logging as practiced for decades.

This is known to the authors of the IFOA process, by the fact that the NSW Government's Resource Management Commission (NRC) staff admitted that they have run out of sufficient resource to fulfil these agreements. Add this to the fact that over 4,000 breaches of Environment Protection and Threatened Species Licence conditions were found in their mere 187 audits of native timber harvesting operations from 2004 to 2014. Nothing ecologically sustainable about these forests operations as these breaches haven't even been declining over that period.

Later in the document follows: *"The draft Coastal IFOA is important to everyone as it balances environmental outcomes and timber production."* Another bare-faced fabrication and biased claim, another of so many being published by this government and the department that is supposedly there to look after our environment. The NRC clearly stated that *"...the Commission has determined that it is not possible to meet the Government's commitments around both environmental values and wood supply."* In the face of such official statements can the EPA put such misleading information on your website? As an agency tasked with representing environmental protection, it appears to now be a propaganda mouthpiece of a government which has lost its direction and showing total disregard for other than their own false and profit based advice. How can it not be assumed

that you openly support increased timber production ahead of protecting environmental values.

These proposed changes to the IFOAs are contradictory to best practice in forestry management across the world as they actually remove protections previously in place for threatened species and ecosystems. With one of the highest species extinction rates on this planet, adoption of this draft IFOA would ensure that this rate continues to increase. The proposed reduction of streamside buffers is probably one of the worst suggestions in the whole draft. Riparian zones are the most important for many species of birds and animals with access to water, understory and nesting sites that are critical for their survival. Greater impact on erosion threatens water quality and quantity and is completely counter intuitive and unacceptable. Reducing those buffer areas is a blatant act of vandalism to access more timber and has been declared to be criminal by experienced environmentalists.

Quite sensibly, It is time to end the heavy loss-making logging of our publicly owned natural native forests and transition to a plantation-based industry, thereby allowing our state forests to be opened up to their multitude of values when left standing. There have been many years of work put into developing the Great Southern Forest proposal here in South-East NSW and it is our belief and that of many, many other organisations that this proposal is a far more equitable and workable solution for our forests than extending the RFAs and reducing environmental protections through this IFOA remake. The Great Southern Forest (GSF) advocates that the Federal and State Governments:

1. Espouse a new, ethically responsible long-term vision based on recognition that our public native forests now have greater environmental and economic value if left standing than being logged for woodchips; and acknowledge that plantation timbers surpass our domestic and export wood needs,
2. Endorse changing management of these biodiverse ecosystems from destructive and loss-making logging under outdated, failed Regional Forest Agreement regimes to their crucial roles in the climate and water cycles, and now halt and reverse declines in their major contributions to species diversity and community well-being,
3. Develop new management arrangements by drawing on science and Aboriginal land management knowledge to empower Traditional Owners and others to participate in a highly skilled workforce in diverse regional jobs in forest restoration and adaptation, and
4. Acknowledge the respect regional communities have: for our native forests and the life they support; for their carbon sequestration and climate mitigation benefits; and for their intrinsic uniqueness and beauty.

I have attached a copy of the GSF Executive Brief for your information. Further information and the full brief is available on the Great Southern Forest website here: <http://www.greatsouthernforest.org.au/index.html>

I hereby call upon the NSW Government to stop proceeding with these changes to the IFOAs and to:

1. Recognise that the Regional Forest Agreements have failed to deliver environmental protection or industry security.

2. Recognise that the benefits of non-timber forest values are vital for the future of regional economies and ecosystems where few and diminishing jobs are provided in the native forest logging industry.
3. Seriously consider the Great Southern Forest proposal as an alternative paradigm for managing our forests in South-East NSW and take steps to bring this about without delay.
4. Commit to a Just Transition for workers out of native forest logging on public land anywhere in NSW.
5. Ensure that public forests are managed for the public good (i.e. environmental repair, education, carbon sequestration and storage, wildlife habitat, provision of clean and abundant water.
6. Properly preserve areas protected as habitat for threatened species, koalas, old growth forest, rainforest.
7. Abolish clearfell logging along the North Coast of NSW.
8. Manage forests to foster truly sustainable forest-based jobs, e.g. fire management using Indigenous practices, weed and feral animal control, regeneration, nature based tourism and more.
9. End the logging of public native forest and complete the transition of the timber industry to 100% plantations.
10. Transfer all existing subsidies from native forest logging into native forest restoration.

If these changes to the IFOAs are allowed to proceed and the RFAs are renewed as the governments are deceitfully and wilfully planning, I feel certain the public reaction will not be one of acceptance. As is documented from the commencement of the unrealistic RFAs, the public outcry was highly visible and that was prior to concerns for climate change and other more recent impacts on our environment.

Were you to admit there is need to do away with these proposed indictments of common sense you would be praised and applauded for complying with your charter and protecting our In Common resources and environmental heritage.

The letter of regulations is one thing, the practice of them another. Neither exist or operate in a vacuum, nor for any true benefit to yourselves without the spirit and concern for humanity.

It is not too late.

Stephen Colbert, satirist says: "... We are divided between those who think with their heads and those who know in their heart"

To proceed with business as usual, or even more destructive, serves no one in the long term and that is the thinking required here. To implement these short term oriented travesties simply postpones the inevitable.

Sincerely,



## **Great Southern Forest - Executive Brief**

**The core of the Great Southern Forest proposal** is to reorient management of South East (SE) NSW public native forests from industrial logging to prioritise ecological integrity of our continent, climate stabilisation, water security and carbon sequestration, thereby activating new money and new jobs in the regional economy.

**The Great Southern Forest proposal** is a widely researched, solutions-based initiative for the carbon and biodiversity dense SE NSW native forests. It offers nature-based solutions to critical national and global problems at low cost and with great benefit for climate stabilisation, environmental and economic success, increased resilience and biodiversity, regional employment, Indigenous participation and social coherence. This new model of forest management is relevant and transferable nationally. Implementation of the proposal can reduce forest fragmentation enabling the connectedness and resilience to withstand and ameliorate a disrupted climate.

### **Great Southern Forest proposal recognises that:**

- forests are vital for climate stabilisation of the planet;
- existing mature plantations can meet Australia's timber needs;
- while the Regional Forest Agreement process provides a timely window of attention on native forests, its assumptions and outcomes are clearly outdated in the light of scientific evidence and the recognised importance of forests on climate and water cycles;
- the present system of management of SE native forests for timber extraction has overseen large environmental, economic, social and employment losses with inestimable damage to soil, water, biodiversity, wildlife, habitat and canopy thus drying out the forests.

**The Great Southern Forest vision**, in a new and ethically responsible way, recognises that public native forests have more significant values than their present use as a source of wood which can now be met by plantations. This vision entails changing management of these biodiverse ecosystems from destructive and loss-making logging under the failed RFA regimes to prioritise their crucial roles in the climate and water cycles, and to their major contributions to species diversity and community well-being.

New forest management arrangements can draw on the best current scientific advice, Indigenous knowledge and successful overseas models; train a highly skilled workforce for diverse new regional jobs in forest restoration; maximise carbon sequestration and climate mitigation benefits; share the value and respect regional communities have for the beauty and uniqueness of our native forests, and safeguard the conditions for Life for all their living creatures. Importantly, this is not a proposal for further reserves although this may be appropriate for some areas.

### **Great Southern Forest recommendations for the NSW and Commonwealth governments are to:**

- 1 Implement a timely re-orientation of management of public native forests in SE NSW from timber extraction to ecological integrity, climate stabilisation, water security and carbon sequestration;
- 2 Cease logging and woodchipping in SE NSW state native forests;
- 3 Enact the full transition to plantations for wood supply;
- 4 Terminate the Eden and Southern Regional Forest Agreements, reinstate full Commonwealth environmental protection and pilot this new model of forest management in SE NSW;
- 5 Ensure implementation of a Just Transitions program for SE NSW timber workers;
- 6 Extend Indigenous partnership in management and employment;
- 7 Prioritise forest preservation and restoration in the 432,575ha of SE public native State forests.

# GREAT SOUTHERN FOREST: AN ECONOMIC ANALYSIS OF CHANGING FROM LOGGING NATIVE FORESTS TO FOREST PRODUCTS OF MORE INTRINSIC AND WIDER VALUE

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This paper analyses economic advantages of systemic transformation in the management of south east NSW public native forests from logging to perpetuating patterns of ecological integrity, climate stabilisation and carbon sequestration. The native forest timber sector is declining financially and for employment while the plantation sector of the timber industry is on the increase; this far more efficient sector sees growing profits and increasing employment while addressing Australia’s timber needs and export opportunities.

In contrast to the declining state of native forest logging in SE NSW, the Great Southern Forest proposal offers feasible options for these public forests which can bring steady profitability, hundreds of new full-time jobs and strengthened ecological resilience while opening the forests for greater benign use, social cohesion and community well-being.

## PRESENT CONTEXT OF NATIVE FOREST LOGGING

Native forest logging in the State Forests of NSW is both uneconomic and environmentally damaging, and the longer it goes on the worse the outcomes will be.<sup>1</sup> It is no longer necessary as plantations provide for most wood needs and are the basis of NSW’s substantial timber processing industries. The present and future for the timber industry lies with plantations. The full transition to plantations should be hastened by the Government, with announcement of an end date for native forest logging and suitable packages put in place for workers under principles of Just Transitions. The RFAs should not be renewed, modified or rolled over; productive alternatives should be enabled

New management arrangements should be developed for the native public forests. There are sound ethical and practical reasons for putting primacy on forest rehabilitation and facilitating recovery of the range of plant and animal species that have been so depleted by so many decades of intensive, industrialised logging. Concurrent with that is the potential for opening the forests for varied, benign activities and increased economic and employment outcomes.

Contrary to much industry spin, ceasing logging will not be a disaster for regional economies; the current contribution is small. In fact, such a transformation will reduce problems for some existing industries and open opportunities for new industries to develop such as the growing nature tourism sector. In the SE NSW region, tourism is the third largest regional employer after health and education. This change in orientation of forest

management would enable economic benefits to be shared widely throughout the community.

Jobs in native forests have steadily declined and now are few in this highly mechanised industry. Around only 600 people are directly employed in the native forest sector in NSW. In the SE from Nowra to the Victorian border and west to Tumut, there are less than 200 jobs including 60 which are Forestry Corporation employees, and 140 without them. Many workers can be absorbed in the plantation sector and others can be prioritised for jobs within the new management arrangements. In the SE, publicly owned softwood plantations at nearby Boballa offer a ready option. The NSW Government has successfully implemented similar transitions in the past.

Native forest logging is a drain on the public purse. Between 2009 and 2014, the profitable Softwood Plantations Division of Forestry Corporation (formerly ForestsNSW) cross-subsidised native forestry logging to the order of \$79 million. Average losses in other recent years have been \$11 million per year.<sup>ii</sup> Thus, native forest logging makes no economic sense and is heavily subsidised by the taxpayer. Continued logging also makes no environmental sense with environmental damage to waterways, soils, forest ecological systems and plant and animal species, not to mention impact on other industries, hydrological systems and regional climate.

Native forest logging is fundamentally unprofitable, increasingly so. Plantations are far better suited to commodity production. A long history of over-logging in public native forests means yields have dropped sharply and logging is increasingly in regrowth and steeper forest areas to the point now of cutting “super small logs” i.e. very young trees.<sup>iii</sup> New and substantial investment would be needed to process smaller logs in the south east; however, there is a question mark over whether there is suitable technology for this, and if so, at what cost and borne by whom. Nor will seeking out markets for biomass for electricity and biofuels make either economic or environmental sense—quite the reverse: it will maintain and arguably compound the losses from native forest logging, not to mention impact on other industries/sectors while increasing green-house gas emissions.<sup>iv</sup> Conversely, ceasing logging of native forests can substantially address Australia’s international climate commitments.

Native forest logging in the SE NSW is inefficient. The plantation forests in 2013 provided around 80% of NSW wood supplies. This was achieved on only one tenth of the area of native forests logged for the remaining 20%. The disproportion is likely to be higher now.<sup>v</sup> The inefficiency and unprofitability will increase.<sup>1</sup> Forestry Corporation harvest plans for the South East analysed by Ajani in 2014 showed that post 2013, twice the areas previously needed would have to be logged to maintain wood supply levels, and this made for much higher costs as well as far more environmental detriment.<sup>2</sup> There has also been detriment (much unacknowledged by governments) to other industries that rely on healthy forests - including water supplies, fish and oyster breeding, and eco-tourism, and regional tourism generally which is essentially based on natural beauty.

It is now clear that Forestry Corporation cannot cut costs from its native forest operations without major additional detriment to environmental amenity throughout the State, and

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<sup>1</sup> In 2013 actual native forest productivity in the SE was 85 cubic metres per hectare and softwood plantations 480 cubic metres per hectare. On the basis of FC harvest plans the future relative productivity was calculated to be native forest 45 cubic metres per hectare and plantation 540 cubic metres per hectare. The plantation forests in the SE are thus 12 times more productive than the native forests, require only a fraction of the land mass

<sup>2</sup> Forests are not regrowing as expected by agencies. Logging has led to soil losses and compaction. In higher areas due removal of canopy young regrowth is not protected from frost. Removal of canopy creates drier and more fire-prone forests.

particularly so in the South East where logging has been the most intensive since the establishment of the woodchipping industry at the end of the 1960s and is by far the main consumer of the forests.<sup>3</sup>

## THE WAY FORWARD

There are major differences in the current situations of the native forest sector between the north and the south of the NSW, and the conservation movements have come to somewhat different conclusions about preferred future arrangements (though not necessarily incompatible ones). Both call for an end to the RFA regimes, an end to industrialised logging, and for new management structures. Colleagues in the north are calling for specified areas for new Koala National Parks.

In the south east we are calling for a comprehensive new management regime for all of the region's State Forests, to accommodate a variety of regimes and conditions from virtually full protection to allowing some sensitive development and activities appropriate to the condition of the particular area of forest—an approach for which there are successful overseas models. Eco-tourism, for example, in appropriate areas of State forests could take pressure off calls for developments in National Parks.

Native forest management truly requires multi-disciplinary approaches and a new management structure, preferably a less politicised one, with a new ethical base and expanded, contemporary framework to integrate regional and planetary understandings, priorities and issues. In the Great Southern forest proposal we are not arguing for new national parks (although this type of protection may be appropriate for some areas). We are arguing for a re-orientation of native forest management aims and parameters that can give primacy to forest rehabilitation and take far better account of the multiple values of the forests and enabling different kinds of activities and products. Extensive research and conceptual work has been done in Australia and overseas that can help identify good models appropriate to NSW and SE NSW in particular.

## GREAT SOUTHERN FOREST ECONOMICS

The economic case for a paradigm change in forest management is strong, with resultant expansion in employment and significant environment benefit.

To elucidate the economics of managing our state forests in an inclusive way responsible to future generations and environment we draw on a thorough parallel study, the NOUS report (2017).<sup>4</sup> The NOUS report economically analyses the proposal for the Great Forest National Park (GFNP) in Victoria. The key conceptual framework is similar to the Great Southern Forest, NSW, proposal such as size, perpetual ecological integrity, connectivity to ensure

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<sup>3</sup> We understand that Forestry Corporation (and possibly other agencies) see new technologies like LIDAR and other remote sensing as means of cost cutting by eliminating the need for on-ground surveys. They can make a very valuable contribution to understanding and measuring many of the wood values of the forests. But advice we have received is that their data does need to be validated by on-ground surveys. Moreover LIDAR et al cannot identify many of the environmental elements that NSW Governments (of both political persuasions) have always claimed they wanted to protect. Identification of animal species will still need on-ground surveys - of the kind conducted by NPWS for koalas when Forestry Corporation failed to find threatened species. It is not clear what contribution these technologies can make to maintaining water qualities. Certainly they cannot contribute to vital yet less tangible benefits to communities.

<sup>4</sup> The Nous Group is an Australian management consulting firm with over 220 staff across Australia and the UK who address complex issues facing business, government and communities. NOUS was commissioned for this study by the Wilderness Society in 2017. The methods used were international best practice.

climate resilience and long term economic, environmental and social benefits.<sup>5</sup> A key difference is that the Victorian proposal is for further national parks. The Great Southern Forest, NSW, proposal is not asking for new national parks. However, connecting corridors to address forest fragmentation and ensure the resilience of an adaptable, inter-connected landscape and for some species' movement, may require government support or acquisition. However, common-sense may indicate that certain areas warrant national park or national reserve status.

Great Southern Forest's primary aim is fundamental and systemic re-orientation of the management publicly owned native forests of the south east, to prioritise on-going ecological integrity while opening up appropriate areas for various benign access and use.

The NOUS report addresses the economic and employment impacts devolving from the Victorian Great Forest National Park proposal in two areas:

1. Detailed analysis of additional economic contribution, park management and visitor expenditure
2. Ecosystem services of biodiversity preservation, water provisioning and carbon sequestration

The analysis considers three distinct scenarios which represent different options for implementing the Victorian proposal. The analysis is conservative and based on publicly available information.

**Scenario 1 *Change in tenure*:** involves only a change in tenure from state forests to national parks with no other changes made to the status quo. (This scenario is not relevant for the Great Southern Forest, NSW proposal per se but provides a baseline for comparison of no government funding with the options of government or government/private investment).

**Scenario 2 *Publicly funded attraction*:** considers the scenario where the proposal is established with funding from the government for infrastructure and more extensive management.

**Scenario 3 *Private investment*:** assumes private investment is attracted to the region, contributing to it as a significant tourism destination and enabling realisation of more of its tourism potential. Private investment is in addition to government investment.<sup>6</sup>

Results of NOUS economic analysis show that in the final year of the 10 year forecast period for this analysis, **Scenarios 1, 2, and 3 each generated an additional revenue and employment.**

Scenario 1: \$7.5 million annually & 80 new full time jobs

Scenario 2: \$48.6 million annually & 520 new full time jobs

Scenario 3: \$71.1 million annually and 760 new full time jobs

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<sup>5</sup> Under the Victorian proposal, the existing reserve system in the Central Highlands of Victoria will be expanded by approximately 353,000 hectares to create a contiguous reserve system spanning 537,000 hectares. Consultations with stakeholders identified these forests as a unique place to visit. Visitation and satisfaction data indicate that the tourism potential of these forests has not been realised under existing arrangements.

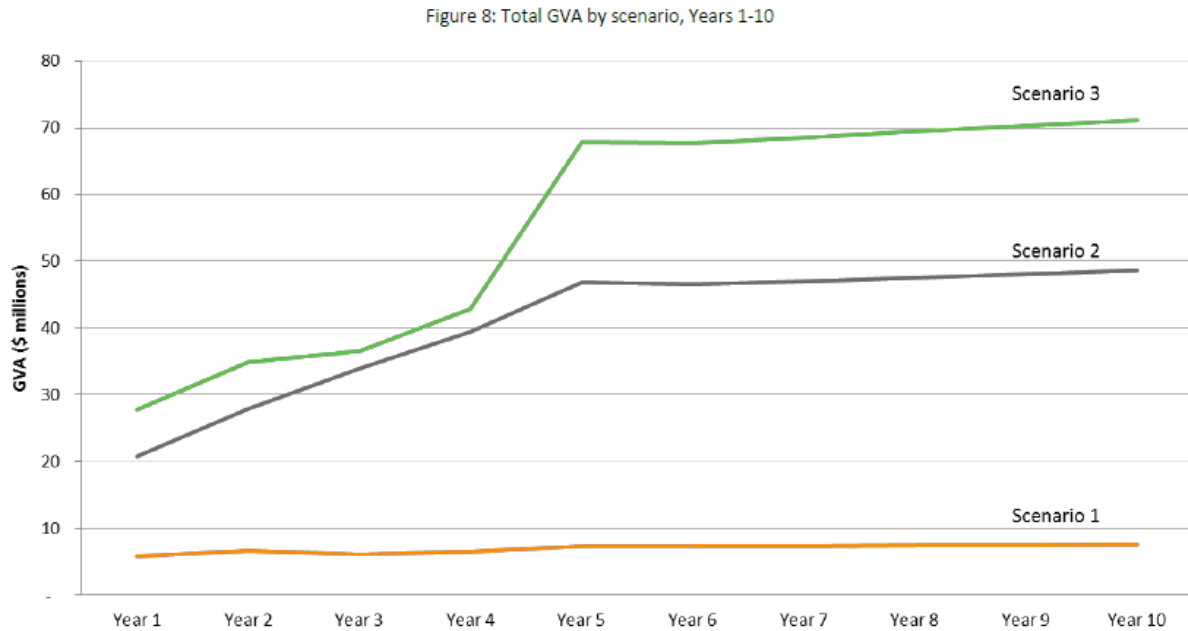
<sup>6</sup> Analogous case studies and research highlighted by stakeholders through the consultation process were drawn on to inform defensible assumptions and derive estimates of increased direct expenditure from proposal establishment, management and higher visitation. Estimates of direct expenditure were then integrated into economic activity (measured through Gross Value Added, GVA).



Importantly, all economic activity is new activity, as is the employment.

## ECONOMIC BENEFITS OF THE THREE SCENARIOS OVER 10 YEARS

(NOUS 2017, p 28, fig. 8)



The three categories of expenditure considered in this analysis are establishment, management and visitor spending.

Expenditure associated with setting up provides an **initial economic benefit to the region**, contributing to both Gross Regional Product (GRP) and employment over the establishment period.

Any additional expenditure on management and the spending by additional visitors attracted to the region would result in **ongoing economic benefits for local economies**.

## ECONOMIC BENEFIT OF PARK DEVELOPMENT, MANAGEMENT AND CAPITAL WORKS

(NOUS 2017, p. 29)

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
		Development phase					Operational phase				
Scenario 1	Direct	\$2.6m	\$3m	\$2.9m	\$3.2m	\$3.6m	\$3.6m	\$3.7m	\$3.7m	\$3.7m	\$3.8m
	Indirect	\$3.2m	\$3.6m	\$3.1m	\$3.3m	\$3.7m	\$3.7m	\$3.7m	\$3.7m	\$3.7m	\$3.8m
	<b>Total</b>	<b>\$5.8m</b>	<b>\$6.6m</b>	<b>\$6m</b>	<b>\$6.5m</b>	<b>\$7.3m</b>	<b>\$7.3m</b>	<b>\$7.4m</b>	<b>\$7.4m</b>	<b>\$7.5m</b>	<b>\$7.5m</b>
Scenario 2	Direct	\$9.7m	\$13.5m	\$17m	\$20.2m	\$24.2m	\$24.1m	\$24.4m	\$24.7m	\$25m	\$25.3m
	Indirect	\$11.1m	\$14.4m	\$17m	\$19.2m	\$22.7m	\$22.4m	\$22.6m	\$22.8m	\$23.1m	\$23.4m
	<b>Total</b>	<b>\$20.8m</b>	<b>\$28m</b>	<b>\$34m</b>	<b>\$39.4m</b>	<b>\$46.8m</b>	<b>\$46.5m</b>	<b>\$47m</b>	<b>\$47.5m</b>	<b>\$48.1m</b>	<b>\$48.6m</b>
Scenario 3	Direct	\$12.2m	\$16m	\$18.2m	\$21.8m	\$35.4m	\$35.5m	\$35.9m	\$36.4m	\$36.8m	\$37.3m
	Indirect	\$15.5m	\$18.8m	\$18.4m	\$21.1m	\$32.4m	\$32.2m	\$32.6m	\$33m	\$33.4m	\$33.8m
	<b>Total</b>	<b>\$27.7m</b>	<b>\$34.9m</b>	<b>\$36.6m</b>	<b>\$42.9m</b>	<b>\$67.8m</b>	<b>\$67.7m</b>	<b>\$68.6m</b>	<b>\$69.4m</b>	<b>\$70.2m</b>	<b>\$71.1m</b>

The proposed changed use of forests generates **new money into the regional economy** with subsequent GVA (Gross Value Added) together with on-going economic multiplier effects.

Additional benefits include recreational value by park users, environmental values and contribution to the Gross Regional Product in establishment, management and tourism.

## EMPLOYMENT, DIRECT AND INDIRECT, OVER 10 YEARS

(NOUS 2017, p. 32)

		Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10
		Development phase					Operational phase				
Scenario 1	Direct	30	40	40	40	50	50	50	50	50	50
	Indirect	30	30	30	30	30	30	30	30	30	30
	<b>Total</b>	<b>60</b>	<b>70</b>	<b>60</b>	<b>70</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>	<b>80</b>
Scenario 2	Direct	120	170	210	260	310	310	310	310	320	320
	Indirect	90	120	140	160	190	190	190	190	190	200
	<b>Total</b>	<b>220</b>	<b>290</b>	<b>360</b>	<b>420</b>	<b>500</b>	<b>500</b>	<b>500</b>	<b>510</b>	<b>510</b>	<b>520</b>
Scenario 3	Direct	150	190	230	270	450	450	460	460	470	470
	Indirect	130	160	150	180	270	270	270	280	280	280
	<b>Total</b>	<b>280</b>	<b>350</b>	<b>380</b>	<b>450</b>	<b>720</b>	<b>720</b>	<b>730</b>	<b>740</b>	<b>750</b>	<b>760</b>

Employment forecasts over the ten-year period of development and operation indicate **significant new fulltime jobs generated directly and indirectly.**

## LOCATION AND VISITATION

Location and visitation enhance economic benefit. The NOUS report identifies the Victorian Central Highlands' forests as a major tourism asset. Drivers for increased visitation include the proximity to Melbourne (90-minute drive), unique natural assets such as the tall Mountain Ash trees, the tallest flowering trees in the world together with other natural features including geological attraction such as the Cerberian Caldera, an ancient 30-kilometre wide volcano, waterfalls and ranges distributed across the eroded rim of the volcano and a diverse range of flora and fauna species.

**Research shows that core drivers for visitation and positive experience** are natural features and access, with enabling infrastructure such as tracks and signage. Visitors rank landscape (including natural features) as the most important aspect, then existence of services and facilities. Well designed and maintained tracks and paths, and clear and helpful direction signage rank third and fourth respectively.

**The Great Southern Forest, NSW**, also has major tourism assets and unique natural advantages, many due to its location. Hundreds of kilometres of magnificent coastline juxtaposition forests, mountains, snow meadows, lakes, rivers, sea pools and estuaries. Much visitor infrastructure already exists with accommodation of various standards in the region which can be increased. Drivers for increased visitation include the proximity to Canberra (a day trip promoted by Tourism ACT) and the Snowy Mountains. The south east corner of NSW is a frequent stop-over for visitors en-route between Melbourne and Sydney. Visitors stay over and spread the economic benefits throughout the region.

**Improved infrastructure increases visitation**; increased visitors increases income and increased use by regional residents (35%). 68% of international visitors wish to engage with nature-based tourism. Cruise ships visit the port of Eden with thousands of visitors pouring ashore looking for nature-based activities. Canberra airport is now an international destination increasing access for international visitors. From the NOUS report, visitor expenditure analysis indicates that international visitors spend \$56 for a day trip and \$345 overnight and domestic visitors spend \$80 for a day trip and \$889 for longer stays. This is direct additional input to the regional economy.

## SIMPLE INFRASTRUCTURE

Simple infrastructure increases visitor satisfaction and so economic benefits. Establishment costs estimates are \$11/ha for tourist infrastructure.

Important visitor infrastructure include the range of activities, volunteer programs, landscape and natural features, paths and tracks, signage, staff, toilets, drinking water, shelter, information and interpretation, and waste disposal.

The NOUS report listed infrastructure changes and attractions which affect visitation rates and resultant economic benefit. Much of the infrastructure is simple and low cost; other requires greater investment, probably private. Each feature is a building block for eco-tourism including:

- greater signage and interpretation sites in and around or adjacent;
- greater accessibility for 'grey nomads'; advertised appropriately;
- greater accessibility for people with a disability;
- increased day picnic sites;
- more signed and listed campsites;
- a zip line tour;
- multi-day and short walks

- a treetop walk
- eco-lodges.

## GREAT SOUTHERN FOREST ASSETS AND INFRASTRUCTURE

**The Great Southern Forest**, NSW, can realise all of these infrastructure activities. Existing walks include the Wilderness Coast and Gulaga walks, and the traditional path of the Indigenous owners, the Bundian Way, from the sea to the mountains is under development. The further potential for short, day and multiple day walks, access to natural campsites, picnic spots and lookouts is extensive. The rich array of tourist infrastructure in the coastal and mountain region can be expanded. Because the proposal does not seek national park status, there is far greater scope to allow more varied accommodation and activities.

The Great Southern Forest proposal embeds the scope for Indigenous partnership. From several Indigenous communities in the region, entrepreneurial ventures can build further with flow on for increased Indigenous employment. Both Indigenous and youth unemployment are high in the SE region and the Great Southern Forest proposal offers long term pathways for jobs, careers and further learning.<sup>7</sup> There are several funded Indigenous employment programs which enable Working on Country with the spiritual, psychological, social and economic benefits which flow from this relationship.

The field is ripe for private participation. The NOUS report indicates establishment costs for a tree walk (\$1.1m), a zip-line (\$1m) and an eco-lodge (\$3.8 – 7m).

Under the Great Southern Forest proposal management costs are not additional expenditure but are a re-allocation of funds from existing forest management budgets to mirror the re-orientation of aims and early outcomes.

Additionally, over the past 10 years, the NSW Government paid Forestry Corporation a total of \$136m in grants related to Community Service Obligations (CSOs) and to reimburse other non-operational activities such as recreation facilities, education and advisory services, government liaison and regulatory services, community fire protection, and research. So within existing arrangements costs for many activities proposed for the Great Southern Forest are already funded.

## ECOSYSTEM SERVICES

Life, humanity and the environment are inseparable, a dynamic interactive entity. There is a growing body of research on the value of services provided by ecosystems quantifying the social, economic and personal benefits people gain from ecosystems. Some of this research extends to the beneficial monetary implications of fostering ecosystems and also the costs of damaging ecosystems including where guarantees of no harm are violated (eg consequences of the increased fire risk with logging) and where international, national and state legal agreements are transgressed.

**Forests also provide many tangible services such as clean water, climate and heat regulation, nurseries for fish breeding, pollination and pest control services for agriculture and aquaculture, storm protection for coastal communities, and physical and mental health benefits for park visitors. They also provide benefits such as neighbourhood amenity, social cohesion and scientific and educational opportunities.**

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<sup>7</sup> New diverse jobs include horticulture, nurse work, fire management and works, road and track maintenance, pest and weed control, visitor management, research, liaison, school and tour guides etc

Ecosystem services are generally categorised into four categories per the Common International Classification of Ecosystem Services (CICES).<sup>81</sup> These are:

- **Provisioning services:** Tangible goods and services that can be exchanged, traded, consumed or used directly by people e.g. provision of food, water and other raw materials.
- **Regulating services:** Ecosystem's role in controlling or modifying the parameters that define the environment; these ecosystem outputs are not consumed but affect individuals, communities and populations and their activities e.g. climate regulation; watershed regulation such as purification and flood control; and biological processes such as pest control, pollination and genetic diversity.
- **Cultural services:** Intangible ecosystem outputs that have symbolic, cultural or intellectual significance e.g. recreational services; spiritual and cultural connection; landscape amenity; health services; social cohesion and involvement.
- **Supporting services:** Services within or between ecosystems e.g. maintaining soil health and enhancing habitat for native species.

Comprehension of ecosystem services is underpinned by the understanding that ecological integrity is inseparable from Life and a positive human future.

The establishment of management systems for forests that ensure on-going and improving ecological integrity are critical, both regionally and for the planet as a whole.

Mounting evidence suggests that **community health and wellbeing and economic resilience** are linked to healthy and resilient ecosystems, and the international community is becoming increasingly cognisant of ecosystem importance.<sup>vi</sup> Japanese university research validates the significant health benefits (eg on cardio-vascular diseases) of 'forest bathing', essentially dwelling and merging with the milieu of a forest. In Victorian, Parks Victoria and Department of Land, Water & Environment recently identified the key ecosystem services contributing to Victoria's economy and community well-being.<sup>vii</sup> Proposals such as great Southern Forest enable people to connect with nature and have access to diverse opportunities for outdoor recreation.

Importantly, a major benefit and ultimate responsibility is the **retention of the natural environment for future generations.**

## THE CHOICE

The NOUS report states categorically that '**business as usual is deferment of the inevitable**'.

Destructive, obstructive industrial logging of native forests is facing systemic limits and failure. For SE NSW there is a deeply researched, positive alternative that offers inclusive benefits for the community and environment.

The public native forests in south eastern NSW offer a perfect coalescing of factors to pioneer a far-sighted approach to managing our forests to ensure perpetuating patterns of ecological integrity and activating the regional economy with new money and jobs.

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- <sup>i</sup> Campbell, Roderick & Richard McKeon, 2016, *Money doesn't grow on trees: the financial and economic losses of native forestry in NSW*, Australia Institute, Discussion Paper, March 2016
  - <sup>ii</sup> Campbell, Roderick & Richard McKeon, 2016, *Money doesn't grow on trees: the financial and economic losses of native forestry in NSW*, Australia Institute, Discussion Paper, March 2016
  - <sup>iii</sup> NSW Department of Primary Industries, 2017, *Review of Coastal Hardwood Supply arrangements. Final report*, GHD, ghd.com
  - <sup>iv</sup> Australian Forest & Climate Alliance, 2018, *Impacts of using native forest biomass for energy*, <http://www.forestsandclimate.org.au/>
  - <sup>v</sup> Ajani, J. (2014 March) *Key information for NSW forest policy today*. Fenner School of Environment and Society ANU.
  - <sup>vi</sup> Millennium Ecosystem Assessment, *Ecosystems and human wellbeing: wetlands and water synthesis*, World Resources Institute, Washington, DC, 2005. Available in: <http://www.unep.org/maweb/documents/document.358.aspx.pdf>
  - <sup>vii</sup> *Accounting for ecosystems and valuing their benefits: Report of first phase findings*, Victorian State Government, Melbourne, 2015.