Submission on the Draft Climate Change Policy and Climate Change Action Plan

Thankyou for the opportunity to make a submission on the Draft Climate Change Policy and Climate Change Action Plan. The submission includes compilation from a number of other submissions which I agree with and strongly support in my own right.

I am deeply concerned that the Draft Climate Change Policy and Climate Change Action Plan do nothing to ensure the protection of forests in NSW from climate change, The abundant studies and research available is apparently being ignored and the ongoing degradation of forests and the threats to the survival of numerous species and ecosystems which are unique to Australia seem slated to continue unabated..

Over decades there have been numerous studies and scientific papers that identify the increasing vulnerability of, and risk to, threatened species and ecosystems due to the accelerating impacts from climate change, including from the 2019/20 fires. Despite these growing threats, for over a decade the EPA has overseen the progressive weakening of the Integrated Forestry Operations Approval (IFOA) and Private Native Forestry (PNF) Codes of Practice, and thereby increased the vulnerability of threatened species and ecosystems to climate change.

The EPA have failed their legal obligations to acknowledge the threats to forest species and ecosystems from climate change, or identify actions to mitigate impacts, in the proposed Climate Change Policy and Climate Change Action Plan.

As a general comment, consulting the polluters on what improvements they are prepared to accept, is hardly in the spirit of the Bushfire Survivors for Climate Action judgement.

The Land and Environment Court found 'that the EPA has not fulfilled this duty under s 9(1)(a) to develop instruments of the kind described to ensure the protection of the environment from climate change. None of the documents on which the EPA sought to rely is an instrument for the purposes of s 9(1)(a) to ensure the protection of the environment from climate change.
An order in the nature of mandamus should therefore be made to compel the EPA to perform its duty. The terms of the order should reflect the content of the duty that I have found, so that the EPA should be ordered to develop environmental quality objectives, guidelines and policies to ensure environment protection from climate change.'

The EPA must enforce industry sector wide targets, as individual consideration of licensing has resulted in uncontrolled pollution.

The following additional initiatives and actions should be included in the plan:

- Setting comprehensive, science-based and enforceable emissions reductions targets within the next 3 years, instead of setting non-enforceable targets based on what industry identifies as ‘feasible’ and ‘cost- effective’.

  Imposing clear enforceable emissions reductions requirements on all licensees, not just new licensees.
- Ensuring policy success by coordinating reforms to ensure climate considerations are embedded in all relevant planning assessments, approvals and conditions; and a range of different policies are aligned to achieve NSW’s climate goals and targets

  Providing clear pathway for assessment and approval of ecologically sustainable

renewable energy projects and associated transmission infrastructure.

It is not for the EPA to merely 'help NSW meet its net zero targets', as the present system of licensing actively undermines the achievement of the targets by legitimising emissions. It is a statutory duty, as found by the Court.

The current method of relying on industry self-reporting some types of pollution, notably CO2 and Methane, are now known to be gross underestimates. The ESA Sentinel 5P program is proving that these emissions are 3-fold of those self-reported. The EPA must use the best available science and technology to independently verify emissions, and revoke the licenses of those that under-report.

The forestry sector is particularly important in enabling NSW to meet it's emissions targets. If native forest logging were to be ceased, it has been demonstrated that the accumulation of carbon would largely offset the State's other emissions, thus allowing for an orderly transition to zero-carbon emissions across the State.

By continuing to license the logging of NSW forests, the EPA legitimises massive greenhouse gas emissions, and undermines the potential for economical sequestration of large quantities of carbon. It also renders the forest ecosystems and their constituent flora and fauna more vulnerable to the effects of climate change and breakdown.

The contrarian, industry-biased assessments of forest carbon budgets by DPIE should not be relied upon by a credible EPA. They must be subject to proper, published peer review to determine their credibility or otherwise.

The practice of classifying whole logs as 'waste' and thus qualifying as 'biomass' to be burned in power plants instead of coal, thereby attracting renewable energy subsidies is particularly concerning. This deceptive practice is in it's infancy in Australia, but experience abroad shows that if allowed to flourish, it will result in widespread destruction and degradation of forests that are otherwise performing important ecosystem services.

The EPA needs to acknowledge that climate change is having a profound impact of the habitat available for a plethora of native species, including many that are already threatened by other processes, including logging and land clearing. No amount of medicalising of our koalas and other species will remedy the main threat to them all - which is the destruction of their habitat. Our wildlife belongs in the wild - not in zoos or animal hospitals.
. .

Native forests are our key carbon sinks and their protection must be a primary strategy in the mitigation of climate change. Cessation of logging of north-east NSW’s public forests alone will avoid the emission of 820,000 tonnes of CO2 per annum from tree biomass, and the creation of legacy emissions of 700,000 tonnes of CO2 per annum that will be realised over decades as logs left in the forest decay and wood used in buildings reach the end of its useful life. Protecting the half a million hectares of north-east NSWs public native forests currently available for logging would allow them to sequester in the order of an additional 2.7 million tonnes of CO2 per annum. The EPA needs to acknowledge that stopping logging of public native forests will increase carbon sequestration and storage and thereby make a significant and immediate difference in this current climate emergency.

It is alarming that our already vulnerable forests are now being seen as fodder for burning for electricity. This will only add to our legacy of environmental and habitat destruction and also

contribute to increased climate change. There is nothing sustainable about burning our native forests. Creating a market for burning native forests for electricity will increase logging intensity and log removal, as well as the removal of plant species considered to be 'waste' when in fact those plants provide food and habitat for our wildlife. There is no commitment shown to fully disclose carbon emissions from burning wood for electricity nor the impact on our native forests and habitat.

The impact of the 2019-202 bushfires - I am familiar with some of the fire impacted eras both pre and post fires and the devastation of the forests is significant and soul destroying. The idea that we should allow logging to continue in the remaining less impacted areas is incomprehensible. Where do we expect our wildlife to go? It seems the EPA cares not.

Logging increases fire intensity and vulnerability. It does not take a rocket scientist to understand that a pile of kindling ignites more easily and burns hotter and faster than a great big log. The same goes for forests. We are steadily reducing all of our forests to piles of kindling as the logs taken continue to decrease in diameter and all the large trees are gone. The forests need time to recover and large trees need to be left standing and replacement large trees must be left to grow or we will will be facing ever increasing devastating bushfires for ever more until there is nothing left to burn - including all of us,

There is no time left - our forests are becoming sicker and weaker and our wildlife becoming extinct. Will we wait until there is absolutely nothing left before we change our ways?

The Bell Miner Associate Die back phenomenon is a misnomer because the real cause of die back is the progressive weakening of the forests which then enable species such as Bell Miners to get in and dominate and eradicate many other species as a result. It is their aggressive behaviour towards lerp-eating species such as Pardalotes which drive them out of the area thus allowing the lerps to infest eucalyptus trees and cause die back. The EPA must recognise that logging and other activities in our forests are causing this issue - rather than the Bell Miners themselves. Like Dailan Pugh I have personally witnessed the arrival of Bell Miners in degraded forests, often where lantana is allowed to get in after large areas of canopy have been cleared, I have seen their impact on driving out most other bird species. Other birds cannot call above the din of the Bell Miners and are therefore unable to effectively communicate with one another and their chicks, so they move away or die out completely.

Protecting forests is climate action .It is essential that the current structure of native forests, and their current carbon storage is identified with a reasonable level of accuracy across all tenures, and separately reported on within the land use, land use change and forestry (LULUCF) sector**.**

Stopping logging of north-east NSW's public forests will avoid the emission of 820,000 tonnes of CO_2 per annum from tree biomass, and the creation of legacy emissions of 700,000 tonnes of CO_2 per annum that will be realised over decades as logs left in the forest decay and wood used in buildings reach the end of its useful life. Protecting the half a million hectares of north-east NSWs public native forests currently available for logging would allow them to sequester in the order of an additional 2.7 million tonnes of CO_2 per annum. The EPA needs to acknowledge that stopping logging of public native forests will increase carbon sequestration and storage and thereby make a significant and immediate difference in this current climate emergency.

In Victoria, every year logging emits around 3 million tonnes of greenhouse gases into the atmosphere. That's around 700,000 cars, and almost DOUBLE the emissions of our domestic flight sector.

The report, '*Victoria's Forest Carbon: An Opportunity for Action on Climate Change*', authored by Dr Jen Sanger from the Tree Projects, finally lays bare the hidden truth of logging in Victoria. Not only is logging destroying precious carbon sinks, it's emitting massive amounts of carbon every year.

The report shows that an immediate end to native forest logging could prevent a whopping 14 million tonnes of carbon emission by 2030!

The report is the first time that the emissions from Victoria's logging sector have been calculated and shared publicly.

The emissions of native forest logging have essentially been 'hidden' as they are reported in the same category as existing forests and forestry plantations - which drawdown and store massive amounts of carbon.

Now we know the truth, and it's even clearer that native forests must urgently be protected for a safe climate future.

Dr Jen Sanger, author of the report, says:

"Native forest logging is terrible for the climate… Most of the forest once it is logged releases carbon into the atmosphere within a few years. While trees are regrown after logging, they can take decades to centuries to absorb the emitted carbon. We simply can't wait decades; we need to reduce our emissions now."

Protecting native forests from logging is one of the best and easiest ways to tackle the climate crisis

After the devastating 2019/2020 Black Summer bushfires, we know it's even more critical to protect forests. We are already experiencing the devastating impacts of climate change here in Victoria - fuelled by native forest logging.

We need the state government to take urgent action to address this crisis by giving forests full protection. Logging must end now - and we'll keep fighting with you until it does.

The EPA needs to recognise that creating a market for burning native forests for electricity will increase logging intensity and log removal, and the rapid release of carbon from coarse woody debris that would otherwise be left in the forest to slowly decompose over decades.

The EPA must ensure that all actual carbon emissions from burning wood for electricity are fully disclosed and considered, with any offsets clearly and separately distinguished.

The EPA needs to recognise that the 2019-20 fires, and accompanying drought, had a major impact on forest species and ecosystems, leaving many in a heightened state of vulnerability ant at increased risk of extinction, and thus necessitating a permanent increase in protection. Requirements include implementing and rehabilitating 100m buffers around rainforest.

The EPA needs to recognise that logging makes forests more vulnerable to wildfires and increases their flammability by drying them, increasing fuel loads, promoting more flammable species, and changing forest structure. This includes increasing the risks of canopy fires by reducing canopy height, increasing tree density and increasing fuel connectivity from the ground into the canopy.

So in response to this evidence of declining Soil Organic Carbon (SOC) due to climate change, what has EPA done to ensure “forest managers will have to implement appropriate soil carbon-enhancing strategies to maintain current SOC levels”? How have they changed the CIFOA or PNF Code of Practice to increase retention of SOC? Despite being made aware of this problem they have done nothing.

The EPA needs to recognise that trees are increasing sickening and dying as the result of increasing droughts and heatwaves generated by global warming. This problem is aggravated by a variety of stressors on tree health, including logging, grazing and weed invasion. As evidenced by the increasing severity of droughts, heatwaves, and wildfires we are perilously close to a cascading series of feedbacks that cause the irreversible decline of forest ecosystems and the release of vast quantities of carbon stored in forest vegetation and soils into the atmosphere, making them into carbon sources rather than sinks. As shown by the 2019-20 fires we don't have any time to waste.

Given the abundant evidence that logging is the primary cause of Bell Miner Associated Dieback, that re-logging affected forests makes it worse, and that climate change is increasing tree stress and thus dieback, it is well past time that the EPA stopped turning a blind eye to the logging of BMAD affected and susceptible forests, and begins promoting restoration**.** If logging is to be allowed, it needs to be on a case by case basis, where lantana and Bell Miners are surveyed before the logging and monitored for five years afterwards. In keeping with the principle of adaptive management the results must be analysed, any needed corrective actions taken, and methods altered to minimise impacts before being trialled again.

As the current aerial mapping is subjective and does not provide a reliable basis for identifying the current extent of BMAD or to be able to monitor changes over time, it is recommended that the worst BMAD affected areas be subject to objective and repeatable mapping using High Resolution Multi-spectral imagery and ALS Lidar to:

- accurately identify the current extent of BMAD affected and susceptible forests
- provide a baseline from which to assess changes over time
- identify the variables affecting BMAD distribution
- quantify the accuracy of current mapping and other remote sensing technologies
- monitor the success of rehabilitation works.

It is reprehensible that despite the public monies spent of rehabilitation works on both public and private lands over the past 20 years that only three studies have monitored the outcomes of treatments on BMAD affected forests in north east NSW, and that for the two studies undertaken on State forests the Forestry Corporation has been allowed to largely suppress and ignore the unfavourable results. In order to better understand the causes of BMAD and assess the effectiveness and costs of rehabilitation, the Mount Lindesay and Donaldson trials need to be updated, and independent and transparent lantana (and other problem plant) removal trials need to be undertaken, using manual methods that minimise disturbance, with clear objectives, monitoring and reporting requirements**.**

Ashley Love.