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ANALYSIS OF THE TIMBER FIBRE STRATEGY

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Contents

INTRODUCTORY REMARKS

This document is an analysis of Australia's Timber Fibre Strategy. It has been undertaken to inform the debate around the development of Forest Policy in Australia and to provide a counter weight to the self-serving nature of this Strategy document. The Commonwealth Government has made no attempt to establish any balanced input by funding the ENGO sector to undertake a strategic analysis of the needs of Australia's forests or what the strategic direction for the forest sector should look like. The Partnership sought no input from outside the sector in the development of the document. Good environmental policy is developed within a context of transparency and at least the attempt to develop a consensus approach. Indeed this was the approach historically pioneered by Federal Labour governments and was evident in the development of the ESD goals and Frameworks, which however poorly, are captured by the EPBC Act[1]. The following analysis largely follows the structure of the document.

PURPOSE

The stated purpose of this strategy document is:

"*The Strategy presented in this report has been prepared for The Strategic Forest and Renewable Materials Partnership, which provides a forum for industry, unions and government to consult, exchange advice and information, and promote cooperation within the forest and wood products industries. A key role of the Partnership is to advise the Minister for Agriculture, Fisheries and Forestry and Government on Australia's sustainable timber and forest product supply, including ways to strengthen industry, employment and social outcomes, environmental outcomes from the use of forested lands in Australia, and considering such matters such as wood and fibre production and products, carbon, biodiversity, and First Nations cultural and economic outcomes*".

"This report has been prepared as a key resource for the Partnership for its further evaluation and transmission to the Government as it sees fit."

What is the *Strategic Forest and Renewable Materials Partnership?* The Partnership undertakes the function of the Forest and Wood Products Council, which is required under section 11 of the Regional Forest Agreements Act 2002 (RFA Act).[2] The body is auspiced by the Commonwealth Government (Department of Agriculture Forest and Fisheries).

"The Partnership provides a constant line of communication between industry stakeholders and the government to consult together and exchange advice and information on the future strategic direction of the sector, government policy and programs, opportunities for collaboration, and to promote cooperation between different sectors of the industry."

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[1] https://www.dcceew.gov.au/sites/default/files/documents/reporting-guidelines.pdf

[2] https://www.agriculture.gov.au/agriculture-land/forestry/industries/strategic-forest-and-renewable-materials-partnership#terms-of-reference

The Chair of the Partnership is Michael O'Connor of the CFMEU forestry division. The Partnership and the Strategy is expected to inform the stated goal of the Federal Labour government to revise and update the National Forest Policy Statement[3] the members of the Partnership are entirely derived from industry insiders.

It is notable and salutary that there is no similar regular stream of advice to government from forest ecologists or forest biodiversity and conservation experts.

Nor does the report consider the extent to which plantation timber has already replaced native forest timber in the marketplace, focusing to a large extent on the declining native forest sector. The emphasis in the report on native forests is questionable given that it identifies around 91% of Australia's timber needs are now met by plantation timber with plantation building products outcompeting many native forest products on price and quality.

The report ignores the opportunity the plantation and afforestation sectors provide to focus the management of native forests on ecological recovery to reduce the risks from climate change to every ecosystem service forests provide including regional rainfall, local climate regulation, water quality and supply and long-term carbon sequestration and storage.

SUMMARY

The summary introduces the reader to the conceptual underpinnings of the document. Some of the statements and assumptions need to be challenged at this level. It is claimed that it is seeking to strengthen environmental outcomes from the 'use of forest lands' in Australia. No attempt to consult with the conservation scientists or ENGO sector is documented or when. What this means is unpacked in the body of the document it doesn't reflect the reality of what is sought, which is in fact objectively seeking to weaken environmental outcomes using straw man arguments, novel and unsupported science and regulatory weakening. The claim is made that it is forward looking and science based but the 'science' what little of it is actually expounded is narrowly constrained and takes the form of assertions rather than referenced facts. It does not refer to any of the latest science on the importance of retaining and recovering forest ecosystem integrity for climate resilience

Six strategies are identified to underpin the industry.

1. **Building sovereign manufacturing capacity**. This is not a bad idea per se and to some extent reflects societal anxiety, post pandemic, that Australia is vulnerable because we don't make enough stuff. As the document lays out what this means is simply to reflect the industries' historical desire for government support underpinned by more resource security and public funding. An approach that dates back to early last century[4].

2. **Meeting demand for timber fibre resources.** This states baldly that there is a supply

[3] https://www.agriculture.gov.au/agriculture-land/forestry/policies/forest-policy-statement

[4] Adjani. J. 2007. The Forest Wars. Melbourne University Press.

problem and domestic demand can't be met. This too is a decades long industry refrain that bears little resemblance to reality[5]. Moreover, the body of the report, is a lot more nuanced and in some aspects contradicts this assertion.

3. Healthy forests, actively managed. This introduces the concept of 'active management' and as written in this summary looks entirely benign. The concept has been shopped around social media for the last 12 months by the forestry profession. The intellectual underpinning is a single paper authored by the Australian forestry profession in academia and published in the Journal of Australian Forestry[6]. The paper is quite tentative and even a little cautious is some respects but as expounded in the body of the report is being used to justify a plethora of interventions in Australian forests including within the national reserve system. These interventions include resource extraction opportunities. Further active management is being equated with First Nations cultural management without citing any detail of what cultural management is and was.

4. Attracting and engaging people and other industry enablers. This is largely aspirational but obliquely goes to the issue of lack of social license. The most recently available research[7],[8] indicates that even in rural Australia support for native forest logging is at historically low levels. The Strategy is actually pitching a hard-line resource security argument for increased forest access and resource security instrument, runs the risk of further alienating community support for the whole sector. The industry has to move beyond spin and reliance on political access to secure its future if it wants to be respected.

5. Supporting and growing regional communities. This seeks to conflate the population of regional Australia (8.5 million people) with the role of the Australian Timber sector. At its best its hyperbole and at its worst its fundamentally dishonest. The timber industry makes a relatively small contribution to the wellbeing of the population of regional Australia. That it would like to grow is understandable. However, its capacity to do so is limited because it also has to be highly productive in terms of jobs per unit volume of timber fibre produced from the forest and because modern manufacturing facilities are heavily automated.

   "*It's reported that First Nations peoples actively managed Country's forests for the bulk of their material needs, and for cultural activities, sometimes with remarkable effect".* This is a completely uncontested statement which is an attempt to set up a straw man argument that somehow this is relevant to growing regional communities with no acknowledgement of the dispossession of those natural resources, destruction of cultural

[5] https://www.agriculture.gov.au/abares/research-topics/forests/forest-economics/forest-wood-products-statistics

[6] Bennett, L. T., Fairman, T. A., Ford, R. M., Keenan, R. J., Fletcher, M. S., & Nitschke, C. R. (2024). Active management: a definition and considerations for implementation in forests of temperate Australia. Australian Forestry, 87(3), 125–147. https://doi.org/10.1080/00049158.2024.2381846

[7] https://www.abc.net.au/news/2018-12-10/forestry-survey-rejects-native-forest-logging/10597490

[8] https://australiainstitute.org.au/report/polling-research-ending-native-forest-logging-across-australia/

sites sand outright genocides on the colonial frontier of which timber extraction was a key driver. Contained within this there is another false equivalence that "actively managed" in this context somehow equates with the 'active management' that this strategy seeks to elevate as a noble role for the forestry profession and the industry.

6. Innovating the timber fibre value chain: The sixth and final strategy is remarkably coy. Over the last 40 years governments have put hundreds of millions of research dollars into innovation a fact acknowledged in the report. "*The timber fibre industry is currently well served with sector-dedicated research, innovation and professional institutions.*" This is a significant understatement the most recent innovation package was over $100 million. Australia's research institutions have undertaken fine work over decades developing a number of innovative industrial processes and improve sawing technologies. Industry can now utilise small dimension wood and produce high strength softwood products, high appearance grade plantation flooring and veneer products capable of substituting for native forest wood. Research has more than adequately demonstrated that wood production not only can but should coexist with agriculture. Yet the only widely accepted technology that has been adopted from a research perspective is innovations in tree breeding. Despite all the money spent, the timber industry has consistently failed to invest in bringing innovation into practice. The problem has been identified in the Strategy as a lack of coordination and collaboration between the research and innovation bodies. This is simply not true. The pattern is clear, the problem is a complete unwillingness to invest, even after government has provided money to scale up to pilot plants - good examples being Valwood in Western Australia and failure to invest in manufactured wood products, instead importing them. The imbalance in trade in wood products in good part results from our export of whole logs and chips. There is a perception of timber shortages, because of the import of timber products into Australia, the statistics paint a more complex story.[5]

The final component of the summary is the identification of a set of issues that cut across all six strategies.

Investment Risk

We live in a fundamentally uncertain world, whether from the global political winds of change or climate change yet the only thing focussed on is a desire to be protected from adverse policy and regulatory change. Which should be read as seeking more resource security and less regulation rather than asking what should the industry do for itself. Securing their own resource base, anticipating societal demands for change and innovative products. Nor is there any recognition that the risks from past damage and climate change to all the ecosystem services forests provide requires a fundamental shift in management focus towards retaining and restoring forest ecosystem integrity to help forests resist and adapt to escalating threats associated with climate change.

The absolute poison for the industry in Australia is access to heavily subsidised government owned and managed forests, be they native forests or plantations.

Messaging

The reports diagnosis of the nature of the timber industry's problems as merely a 'messaging' problem is breathtakingly tone deaf. The synopsis in the summary is quoted in full below.

"*Along the value chain from native forest and plantation management, silviculture and harvesting, to manufacturing and recycling, there is concern that the fundamental messages that the industry is sustainable, responsible, and environmentally and carbon friendly, are not getting traction outside the industry. The industry's raw materials, manufacturing processes and products are demonstrably superior to alternatives, and the industry is extremely well positioned to assist Australia meet its short and long-term net emissions goals. However, this is not well understood by consumers, policy makers and the broader community. The industry recognises that to meet its potential and to realise the opportunities, it needs to improve its messaging to those outside the industry.*"

It would be fantastical thinking to assume that the environment lobby has been so devastatingly effective that it is all just an issue of poor messaging in the face of green misinformation campaigns. Over decades the timber industry has spent a large fortune writing, producing and publishing propaganda to convince the public of the contentions contained above, as well as wining and dining politicians and the media. That this hasn't worked to convince the public is not down to the message but to how unconvincing that message is compared to the documented, on ground impacts of native forest logging. Impacts which are now routinely well able to be monitored and observed by the community and proven by science. There is a strong scientific and policy consensus that the management of native forests has fundamentally failed to protect vulnerable species, including in the EPBC Act (Samuels) review[9] and that increased protection and restoration of Australia's native forests is now urgent.

Research

The claim is made that more research is needed along the value chain. With a more than $100 million still to be spent it is hard to substantiate this claim. Research needs should have been comprehensively identified by now. Apparently, the industry strongly recognises the need for research and innovation (if someone else pays for it) and that investment is required to understand the opportunities and capitalise on them (provided it's not their money).

Science

It is baldly stated. "*The industry's growth and development across the value chain has been hampered by policy decisions that have not been based on sound science. The industry wants all governments to work with it to develop and maintain a policy and regulatory environment that is*

[9] https://www.dcceew.gov.au/sites/default/files/documents/epbc-act-review-final-report-october-2020.pdf

science-based, recognising the value of the industry and its contribution to national and international objectives."

Sound science is conditioned by 'recognising the value of industry and its contribution' to economic and political objectives. Science that disagrees with or does not suit industry objectives, is by definition not sound.

The current policy settings in Australia are based on scientific assessments utilizing the best available information at the time. Half a billion dollars was spent on 'sound science' 25 years ago in the development of Comprehensive Regional Assessments. In turn these were based on a set of criteria that went through the most rigorous intergovernmental scientific development process[10]. These have been critiqued in the literature not because of their weakness but because of the failures in their implementation[11],[12],[13],[14]. Including failure to ensure the 'Adequacy' and 'Comprehensive' requirements of the JANIS Reserve Criteria were met. The failures of the Regional Forest Agreements, as an instrument to deliver conservation outcomes, is evidenced in the comprehensive review of the implementation of the EPBC Act[15]. Given the long period of time since the scientific assessments conducted for the RFA process; the critical importance of improving forest resilience to climate change; and the severity of the 2019/20 fires[16],[17],[18] there is an urgent need for an independent assessment of the ecological condition of Australia's native forest estate to inform decisions on future native forest management[19].

For a document that uses the word science at every opportunity there is a remarkable paucity of peer reviewed science quoted in the body of the strategy, just 3 documents. The Australian Forestry Journal article quoted above[4] plus two IPCC reports, which are out of date. For example, more recently IPCC AR 6 working group 3 concluded that protection offers the highest mitigation outcome in the AFOLU sector[20]. There is no attempt made at identifying a basis for a lot of the claims made with a very heavy emphasis and multiply repeated assertions made in respect of 'active management'.

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[10] https://www.agriculture.gov.au/sites/default/files/sitecollectiondocuments/rfa/publications/nat_nac.pdf

[11] KIRKPATRICK, J.B. 1998. **Nature conservation and the Regional Forest Agreement process**. Australian Journal of Environmental Management 5: 31-3

[12] HORWITZ, P. and CARVER, M. 1998. **Credible science? evaluating the Regional Forest Agreement process in West-ern Australia**. Australian Journal of Environmental Managements : 213-24.

[13] Mackie, K. 2015. **Success and Failure in Environment Policy: The Role of Policy Officials.** Australian Journal of Public Administration, vol. 75, no. 3, pp. 291–304 doi:10.1111/1467-8500.12170.

[14] Davey S M, Hoare J R L and Rhumba, K E. (2002).**Science and its role in Australian regional forest agreements.** International Foresty Review 4(1), 2002 39.

[15] https://www.dcceew.gov.au/sites/default/files/documents/epbc-act-review-final-report-october-2020.pdf

[16] Lindenmayer, D.B., Zylstra, P., Kooyman, R., Taylor, C., Ward, M. & Watson, J.E.M. (2022) Logging elevated the probability of high-severity fire in the 2019–20 Australian forest fires. *Nat Ecol Evol* 6, 533–535. hRps://doi.org/10.1038/s41559-022-01717-y

[17] DellaSala, D.A. et al. (2025) Measuring forest degradation via ecological-integrity indicators at multiple spatial scales. Biological Conservation 302, February 2025, 110939 https://doi.org/10.1016/j.biocon.2024.110939

[18] Barni, P.E. et al. (2021) Logging Amazon forest increased the severity and spread of fires during the 2015–2016 El Nino. *Forest Ecology and Management* 500. https://doi.org/10.1016/j.foreco.2021.119652

[19] https://www.griffith.edu.au/__data/assets/pdf_file/0029/2168525/INFM-ACCU-Submitted.p

[20] https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_FullReport.pdf

A number of case studies have been included as Appendix 2 of the strategy. Many of them are based on opinions, slanders, half-truths with no attempt to examine ecologically based peer reviewed scientific findings.

It is curious that anticipated resource withdrawals in Tasmania are not examined and there is not a single reference made to the Tasmanian Forest Agreement 2012[21]. At the insistence of industry participants in the negotiations, a very science heavy process verification was developed and undertaken. This process upheld the values claimed for additional areas to be set aside in reservation, resource commitments from native forests were adjusted and a clear possible pathway out of native forest logging was identified. Also ignored is the fact that wood supply in Tasmania was projected by independent verified modelling to drop by 70% in 2027. The scientific assessments that informed this outcome incorporated the most up to date scientific knowledge and approaches to conservation management at that time. An incoming liberal party government, at the behest of sections of industry that were ideologically opposed to the agreement undermined it first by making very large areas including long established reserves available for rainforest logging[22] and more recently opening up areas that were initially reserved as part of the RFA, then verified as having High Conservation Values[13], in NE Tasmania for logging[23]. The incoming (2025) Liberal government, in order to govern, has now retreated from this following successful campaigning from ENGOs and local communities, in other words there was no social license nor scientific credibility for the proposed gift to the industry.

A fundamental commitment made in the National Forest Policy Statement and Regional Forests Agreements was for reservation to be secure. One of the most retrograde steps the strategy advocates in its report is for extractive forests resource use in all tenures.

Employment

Through all sectors of the industry and across the value chain there is a commitment to grow employment, improve safety, develop career paths and increase opportunities for well-paying jobs, especially in regional areas.

This is an uncontentious and even noble statement but it doesn't reflect the declining employment realities in the sector over the last 40 years.

While ever the risks to the integrity and stability of native forests and the wildlife that underpin their ecological functions, resilience and integrity are not addressed, risks to employment in the

[21] https://www.dcceew.gov.au/environment/land/forests/intergovernmental-agreement

[22] Brendan Mackey, Sean Cadman, Nicole Rogers, Sonia Hugh , Assessing the risk to the conservation status of temperate rainforest from exposure to mining, commercial logging, and climate change: A Tasmanian case study, Biological Conservation, Volume 215, Pages 19-29, ISSN 0006-3207, https://doi.org/10.1016/j.biocon.2017.08.032

[23] https://www.abc.net.au/news/2025-03-19/tasmanian-government-moves-ahead-with-native-forestry-logging/105065596

native forest sector will increase.

Indigenous engagement

There is a recognition that the timber fibre industry has much to learn from First Nations Peoples, particularly in management of forests and care for Country. All acknowledge that more can be done across the entire industry to create employment and career opportunities for indigenous people. The industry also recognises that working with First Nations Peoples must start with appropriate engagement, and across all industry sectors there is a commitment to increasing understanding and engagement.

Noble sentiments that don't reflect First Nations lived experience where they object to resource extraction from their country. To be taken seriously the industry needs to genuinely commit to Free, Prior and Informed Consent when their rights, sites and cultural sensitivities are at stake. While there is an action item in the Strategy acknowledging this, experience to date is that it is only applied where a traditional owner supports forestry. It is unfortunate that the advocacy snapshot in Appendix 2 of the strategy is marred by a backhanded reference to FPIC in the context of an unsubstantiated attack on the ENGO community.

Complex industry structure

The report argues that somehow the timber industry is special, however on reading the same arguments could be made for other primary industries in Australia particularly agriculture.

INTRODUCTION

The Introduction to the document sets out the who, i.e. the Strategic Forest & Renewable Materials Partnership, the purpose, the vision and objectives and a set of specific issues. The last goes to the Terms of Reference which are laid out below:

"The Partnership's Terms of Reference provide the framework for developing the Strategy. This includes:

- *Identify issues facing Australia's forest and wood products sectors to aid government policy making, including: - sustainable timber and forest product supply,*
- *- ways to strengthen industry, employment and social outcomes, and- environmental outcomes from the use of forested lands in Australia.*
- *Consideration of the above should include producing wood and fibre products, carbon, biodiversity, and First Nations cultural and economic outcomes.*
- *Present strategic policy options and initiatives to foster investment, growth and sustainability of Australia's forest and wood products sectors.*
- *Highlight priorities for infrastructure investment and value addition.*

- *Present priorities for nationally relevant research, development and innovation.*
- *Advise the Minister and Government on forest and wood products sectors, with consideration of government policy and programs.*
- *Develop the Strategy.*

In addition to these specific terms of reference, the government has indicated that its priorities for the Agriculture, Fisheries and Forestry ministry include:

- *Biosecurity*
- *Trade and market access,*
- *Sustainability and climate (emissions reduction),*
- *Workforce, and*
- *First nations people*

Accordingly, where appropriate, this Strategy process has sought to comprehend these priorities in its output and recommended actions"

While the strategy has the appearance of addressing the terms of reference, when addressing environmental and biodiversity issues and the climate mitigation value of forests, it has done so obliquely or perversely.

A lot of statistics, graphs and maps are presented to characterise the status quo and a situation analysis is presented that lists and expands on the issues set out below:

1. *Stagnation in investment and activity to expand timber plantations*
2. *Declining availability of harvestable timber resources*
3. *Adverse State government decisions ending native timber harvesting*
4. *Depressed domestic market for sawn timber*
5. *A national crisis in house building, home availability and its affordability*
6. *A widening gap between domestic timber demand and domestic supply capacity*

1. Stagnation in investment and activity to expand timber plantations

A graph is presented by way of an explanation and it is suggested that increasing rural land prices and dairying make plantation establishment uncompetitive. Incorporating farm forestry into diversifying farm income - a successful strategy in parts of Western Australia - has not been considered. Neither have the resources available from waste and recycling streams.

A robust and independent assessment is also needed of whether wood supply is the issue or whether investment in wood processing and value adding is what is lacking?

Caution is needed when considering further plantation establishment. There is not even a passing reference to the lessons that might be learned from the collapse of the MIS investment schemes and the toxic legacy this left behind. This is a major oversight the industry needs to reflect on so as to avoid similar failures in the future.

The plantation MIS were established following the deliberations of the National Plantation Advisory Committee. This committee was established in 1990[24] and was broadly representative of social, environmental and economic interests and included members with both a technical and policy perspective. The report laid out a cautious approach economically, socially and environmentally that was largely ignored. Following the MIS collapse a Parliamentary inquiry was eventually set[25] up in 2014 and the full suite of documents and submissions can be downloaded. The collapse of the MIS was both predictable and avoidable[26]. The recommendations made in the NPAC report for how to stimulate investment are still largely true. What is clear is that the changes to the tax system were so poorly delivered that this approach should probably be ruled out in future.

2. Declining availability of harvestable timber resources

This section is a very confused. Australia has never had a policy framework that fosters value adding let alone a high value export-oriented timber industry. The contrast with NZ is worth exploring. NZ decided decades ago to ensure its' industry was export oriented. The result is an internationally competitive industry that outcompetes Australia on quality and price. The role of international markets is also poorly explained. The fact that 91% of the wood harvested in Australia comes from plantations makes assertions about native forests somewhat irrelevant. The focus of the Strategy appears to be on hardwood and softwood sawlogs supplies. The latter is not in short supply! Moreover, shifting the management of the hardwood plantation resources from whole log and chip exports to domestic value adding has never been pursued. There is a rather equivocal suggestion that exports, presumably of softwood sawlogs, could be used domestically.

3. Adverse State government decisions ending native timber harvesting

The picture painted in the report and case studies is largely disingenuous. The decisions by State Governments, Victoria and Western Australia were predicted and predictable and first and

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[24] Australia. National Plantations Advisory Committee & Richards, B. N. (Bryant Neville). (1991). Integrating forestry and farming : commercial wood production on cleared agricultural land / report of the National Plantations Advisory Committee. Canberra : Dept. of Primary Industries and Energy

[25] https://www.aph.gov.au/parliamentary_business/committees/senate/economics/mis

[26] https://www.aph.gov.au/DocumentStore.ashx?id=37c78bac-0604-426a-bb51-89758c7527b2&subId=302284

foremost reflect the incapacity of the forests in those jurisdictions to continue to supply the legislated wood supply. The decision to create a new National Park in NSW was announced well before an election and has been so slow in its implementation that it actually has had no impact on harvesting at the time of writing this analysis. In fact, the opposite may be the case as the proposed GKNP seems to have been subjected to accelerated harvesting following changes to logging legislation[27]

In Tasmania when, for the first time, independent and transparent modelled data[28] of regeneration over time and timber yields was provided, it was revealed that it would not be feasible to maintain then current wood supply even if no further reservation occurred. The same analysis also revealed that regeneration effort over time, i.e. cutting, correlated almost perfectly with global pulpwood demand. It was and remains clear that plantations will have to make up supply shortfalls, yet the Strategy chooses to ignore the realities of sustainability in Tasmania. The Forestry Tasmania 2022 sustained yield report acknowledges that sawlog supply will drop from 137,000m^3 to 58,000m^3 in 2027.

The industry takes no responsibility for its own role in the demise of native forest logging and the inexorability of the continuation of the trend. In Victoria the announced termination date had to be brought forward because of the demonstrable and legally proven impact on threatened species[29].

Further the strategy in multiple locations seeks to paint a picture of sustainability of egregious practices. For example, under Strategy 3.

For decades the conversion of native forests to plantations was a staple part of forestry, while in most jurisdictions the practice is no longer tolerated, small scale conversion of forests remnants within land zoned as plantations in NSW continues[30]. For species with hollow dependency the loss of mature forest habitat is critical and 'forestry operations' play an outsized role in habitat destruction only exceeded by landuse change i.e. 'conversion'. Ignoring the importance of ecological connectivity and permeability for wildlife adds insult to injury for many species.

The reality of wood supply in Australia is very clear. Native Forests produce less than 10% of supply but there is an inordinate focus on retaining native forest wood supply, at any cost, in the strategy.

[27] https://theconversation.com/proposed-nsw-logging-laws-value-timber-over-environmental-protection-97863
[28] https://www.aph.gov.au/DocumentStore.ashx?id=553dcfdf-1030-493c-86bc-3325fbfde254&subId=205286
[29] https://envirojustice.org.au/legal-work/protecting-ecosystems/defending-native-forests/eja-logging-court-cases/ the-possums-case/#:~:text=After a three-year David and Goliath battle in the,logging operations across the country.
[30] Tim Cadman, Kate Macdonald, Edward Morgan, Sean Cadman, Sikha Karki, Matthew Dell, Gregory Barber, Upama Koju, Forest conversion and timber certification in the public plantation estate of NSW: Implications at the landscape and policy levels, Land Use Policy, Volume 143, 2024, https://doi.org/10.1016/j.landusepol.2024.107179

4. A depressed domestic market for sawn timber.

This is essentially a counter factual to the insistence throughout the document that the major problem facing the industry is lack of supply and the security to access supply. The supply problem is described as cyclical. However, there is enough sawn timber house framing for 50,000 houses sitting in timber yards. The problem is described as cyclical even though there is enough sawn timber for house framing for 50,000 houses in timber yards. Rather it this raises the question of industry capacity to respond to changes in demand – predominantly a question for plantation pine producers. The industry needs to learn, within sustainability constraints, to match input to output. Leaving plantations to grow adds to both carbon stocks and standing volume. Except where catastrophic losses have occurred due to fire or disease far greater flexibility is required in timber harvesting to enable cutting the plantation resource to meet demand, rather than to meet contractual obligations.

5. An acknowledged crisis in house building, home availability and its affordability.

This is simply a statement of the obvious that has little if anything to do with wood supply.

6. A widening gap between domestic sawn timber demand and domestic supply capacity.

The clue of the realities in respect of this issue is in the title, "widening gap" between demand and domestic supply capacity, which is not the same as a shortage of supply. The current excess in in supply, which is explained as cyclical, is likely to be structural in nature.

"*Australia's apparent consumption of sawn softwood timber is 4.2 million m3 per year, while domestic production is 3.6 million m3 per year23. This current domestic supply gap of some 0.6 million m3 is predicted to balloon over the coming decades such that, by 2050 "...*

This statement is very hard to square with the current stockpile of house framing. Likely more important, is that Australian sawn timber products are expensive, relative to other producers, including other international plantation producers such as New Zealand, which has long been able to compete with domestic plantation supply and certainly well able to fill any shortfall.

An alternative and equally valid conclusion could be that alternative material up take is already filling the perceived supply gap, including steel framing and concrete. Utilising steel and concrete is environmentally undesirable at present because there is a real difference between the embedded energy in timber framing and steel and concrete alternatives. However, this natural advantage is likely to be short term as the race to produce green steel, which is seen as highly desirable by policy makers[31], takes off with a very powerful Australian backer in Andrew 'Twiggy' Forest. The picture for green concrete is much less clear[32] and competition on environmental

[31] https://theconversation.com/chinas-greening-steel-industry-signals-an-economic-reality-check-for-australia-261863

[32] Md Rafiur Rahman and Md Rofiul Islam Rofi / Int.J.Arch. and Plan. 5(1) (2025) 35-40 https://doi.org/10.51483/

advantage vis a vis timber is likely to have higher longevity.

There is a complete failure in the strategy to look at novel sources of timber like dam salvage, and recycling despite the opportunities it represents[33]. Wood for furniture is also largely ignored.

In a sub section of the introduction titled '*Principles informing the strategies development'* the strategy seeks alignment with governmental national priorities. This makes sense but is a largely gratuitous exercise. There is one principle that stands out: *Science Based:*

"This principle is especially important to observe in relation to land use and forest management and means, for example, that legislative and jurisdictional questions of land allocation and tenure, which principally belong in the governmental or political domain, ought not dominate or overly inform the Strategy development process unless specifically requested by The Partnership."

Instead, the strategy is full of discussion about jurisdictional and land allocation issues and peer reviewed science certainly doesn't feature predominantly in these discussions. In fact, a whole section discussed above (Adverse State government decisions ending native timber harvesting) is devoted to this issue and Strategy 2 Meeting demand for timber fibre resources devotes pages and specific action statements to addressing the issue. Two cases studies are further devoted to largely complaining about jurisdictional questions of land allocation made in NSW and Victoria. Given the admonition in the statement above one can only assume that the Partnership requested this input. This request to avoid the issue of land allocation clearly came from government, who funded the work, a request that was ignored in the framing of the strategy.

Finally, a very tenuous link to the *National Science Statement*[34] is drawn.

The remainder of the introduction deals largely with the consultation process which was entirely focussed within the industry. The final paragraph goes to the status of the document.

"*These consultation activities were followed by discussions with the Co-chairs of the Partnership and the production of six initial draft proposed strategies. Those draft strategies were then considered by a major timber fibre sector roundtable held in Hobart on 5 December 2024 (the Roundtable). The Roundtable was hosted by the Minister for Agriculture, Fisheries and Forestry and was attended by 60 timber fibre sector business, union and government leaders."*

[33] https://www.hydrowood.com.au/blog/2025/8/19/hydrowood-secures-strategic-investment-to-accelerate-growth-and-expand-global-timber-opportunity

[34] https://www.industry.gov.au/publications/national-science-statement-2024

THE STRATEGIES

The document is quite repetitive and quite a lot of the issues it raises have already been canvassed. Further analysis under the specific strategies is focussed on issues of distortion and misrepresentation with a direct potential to impact adversely on Australia forests.

Unsurprisingly the industry is seeking new and extended subsidies and unprecedented access to the forests for resource extraction. In terms of encouraging plantation establishment specific proposed actions are examined on their merits. Access to continued and expanded native forest logging is a distraction being driven, in part as part of a broader culture war with serious attempts at the co-option of First Nations peoples. A tabular structure has been used to capture the strategy components and identify if they pose, a threat - , are neutral 0 or could bring benefits +. Where further analysis of issues from the proposed action has been undertaken. The action has been asterisked *. Where money is being sought the $ column has been marked x.

Strategy 1: Building sovereign manufacturing capacity

STRATEGY COMPONENT	$	+	0	-
Future Made in Australia				
1.1. The Government will include the forest and wood products industry as a priority industry in its Future Made in Australia policy and the industry will access funding from this and other relevant programs to help build sovereign manufacturing capability and capacity. *	X		0	-
1.2. The forest and wood products industry will focus on making the highest value products here in Australia.		+		
1.3. The forest and wood products industry will look beyond traditional uses of timber fibre and develop manufacturing capacity in other products including in the bioeconomy.			0	
1.4. The forest and wood products will invest in innovation, new product development and new manufacturing methodologies which can utilise the fibre currently exported in the form of logs and woodchips.*			0	-
1.5. The forest and wood products industry will work with Federal and State Governments to deliver on housing policies that encourage the use of timber fibre products manufactured in Australia.			0	
1.6. The forest and wood manufacturing sector will work with forest owners and managers to reduce investment risks and support adequate return on investments whist (sic) seeking to encourage plantation establishment on non-forested land.		+		
Imports and competing products				
1.7. The forest and wood products industry will work with timber importers and the steel framing industry to enable the sector to gain a sound understanding of their capabilities, to facilitate the incorporation of world's best practice and technology, and to maintain viable markets.			0	
1.8. International benchmarking of productivity will consider all aspects of productivity, not only labour productivity, to help Australian manufacturers understand what is possible and what can be implemented in Australia. These should include technology, site efficiency, materials recovery, etc.			0	
Modern methods of construction				
1.9. The forest and wood products industry will develop manufacturing capacity and capability in timber fibre products that are used in modern methods of construction.			0	
1.10. The forest and wood products industry will investigate and, where appropriate, introduce products and systems that have been developed overseas to support modern methods of construction.			0	
Infrastructure				
1.11. The forest and wood products industry will work with Governments to ensure the timely provision of essential infrastructure to enable the development of manufacturing capacity and support the workforce required, particularly in regional areas.			0	
Smoothing the cycles				

STRATEGY COMPONENT	$	+	0	-
1.12. The forest and wood products industry will work with Governments to develop programs which create demand for Australian manufactured timber fibre construction products during the low points of the building cycle.*	X			-
Promotion and credentials				
1.13. The forest and wood products industry will promote the benefits, and particularly the environmental credentials, of Australian timber fibre products to increase their use and acceptance. *				-
Cost competitiveness				
1.14. The forest and wood products industry will build sovereign manufacturing capability and capacity through cost efficiencies and economies of scale matched to resources and markets.			0	
1.15. Governments will provide subsidies to the forest and wood products manufacturing industry for investment in energy (including heat energy) generation utilising carbon neutral wood fibre waste. *	X		0	-
1.16. The energy generated from carbon neutral wood fibre-based fuels will be recognised as renewable, and the benefits of utilising this form of renewable energy will be available to the timber fibre processing sector. *	X			-
Investment facilitation				
1.17. The Government will work with the forest and wood products industry to identify high priority candidates for investment facilitation to kickstart domestic capability in new products, particularly in the bioeconomy.	X			-
Research and development				
1.18. With the support of Governments, the forest and wood products industry will continue to invest in the innovation, research and development of the range of timber fibre products that can be manufactured from the current and future resource base with an aim to maximise the manufacture of the highest value products in Australia.	X		0	
Scale				
1.19. The forest and wood products manufacturing sector will invest at scale where it has confidence in access to the timber fibre required to match requirements.				-

Further Analysis of specific strategies

1.1. The Government will include the forest and wood products industry as a priority industry in its Future Made in Australia policy and the industry will access funding from this and other relevant programs to help build sovereign manufacturing capability and capacity. *

At best this is neutral in outcome, at worst if successful, it could be used to fund large commodity-based investments in downstream processing of native forest fibre. The pulp mill proposal in Tasmania failed because the money market (banks) would not invest in a proposal with no social licence and the likely sovereign risk. What the industry is likely seeking is government investment in grid scale biomass burners. Investment in plantation-based fibre manufacturing capacity in a vertically integrated proposal is under active consideration in Tasmania. And Verdant Earth is still trying to secure approval to convert and restart a defunct coal fired power station in NSW to burn native forest wood instead of coal. Utilisation of any native forest material for power generation will to attract strong opposition.

1.4. The forest and wood products (sic) will invest in innovation, new product development and new manufacturing methodologies which can utilise the fibre currently exported in the form of logs and woodchips.*

This is probably neutral but there is a potential downside risk see 1.1 above.

1.12. The forest and wood products industry will work with Governments to develop programs which create demand for Australian manufactured timber fibre construction products during the low points of the building cycle.*

This is just ridiculous no other industry has sought this level of Government intervention. It seems unlikely to succeed. Wood should remain unharvested in cyclical downturns to increase standing volume and carbon sequestration.

1.13. The forest and wood products industry will promote the benefits, and particularly the environmental credentials, of Australian timber fibre products to increase their use and acceptance. *

The level of self-delusion about the environmental benefits of the industry is perhaps best summarised in the quote used (p33) to demonstrate the attitude of the industry:

"The high level of misinformation and politicisation about the renewability and sustainability of timber fibre in Australia has effectively led to market failure in the production of products that are accepted and desired throughout the rest of the world. Government should back this strategy with a bipartisan long term social marketing strategy and explicit support for timber products as a key component of Australia's renewable manufacturing capability."

This quote is attributed to 'Healthy Forests Foundation' an organisation purporting to support "*resurgent Indigenous conservation*". The CEO of the organisation is Monique Dawson, former CEO of VicForests, an organisation whose environmental and social credential have been demolished by the media[35], in academic papers[24], and by the law courts[21]. Monique Dawson is the co-author of the case study (*Snapshot: Recognising First Nations' knowledge, expertise, and practice*) included as an appendix. The study is marred by a highly pejorative attack on "some environmental organisations and scientists" and makes inflammatory claims about ENGO commitment to FPIC. Healthy Forests Foundation and its direct links to former VicForest staff and the logging and logistics company Pentarch were exposed in an ABC story[36] and follow up interview with the ABCs environmental reporter. Ms Dawson's strong anti-environmentalist view is a matter of the public record.

The use of Ms Dawson to lead the promotion of the environmental benefits of the industry are symptomatic of the lack of real social license of the industry. The problem with this approach is that the plantation sector gets caught up in this extreme narrative to their detriment when there actually is a positive story to tell.

1.15. Governments will provide subsidies to the forest and wood products manufacturing industry for investment in energy (including heat energy) generation utilising carbon neutral wood fibre waste. *

This is highly problematic because claimed carbon neutrality of forest-based bioenergy is a figment of flawed forest carbon accounting rules. Genuinely carbon neutral wood fibre would require continuous expansion of bioenergy tree crops. If it were confined to plantation sawn timber residues (mostly saw dust) this wouldn't need subsidies. Burning any form of wood is highly emissive per unit of energy produced – often at least as emissive as burning coal and burning any form of native forest material, waste or otherwise, is neither clean, green nor renewable in any relevant time frame[37].

1.16. The energy generated from carbon neutral wood fibre-based fuels will be recognised as renewable, and the benefits of utilising this form of renewable energy will be available to the timber fibre processing sector. *

Currently native forest material is prohibited as a renewable source of energy under the Renewable Energy Act - unable to generate clean energy generation certificates.

Overturning this position would prolong the life of coal-fired power stations by opening up the

[35] https://www.abc.net.au/news/2021-11-25/victoria-forests-agency-accused-of-spying-on-campaigner/100613342

[36] https://www.abc.net.au/news/2024-08-08/vicforests-closure-healthy-forests-foundation-logging/104194836

[37] "BURNING FOREST BIOMASS FOR ENERGY, Not a source of clean energy and harmful to forest ecosystem integrity", BG Mackey, DB Lindenmayer, H Keith https://doi.org/10.25904/1912/4547

possibility of conversion to, or co-firing with, wood.

This dangerous distraction depends on government support for carbon accounting loopholes that foster the false assumption that emissions from burning wood should be accounted as zero. Where substituting wood for coal has been allowed, the practice has had a devastating effect on forest carbon stocks. Logging has intensified to meet demand resulting in shift in European forests from a net sink to net source of CO_2..[36]

Strategy 2: Meeting demand for timber fibre resources

The discussion leading to the identification of the strategies and actions in this case are fulsome and of interest. So, as appropriate a commentary has been provided before the analysis of the impact of the strategy.

Three charts provided as figures are presented below the first details the breakdown of products derived from logs harvested in the last year of the analysis.

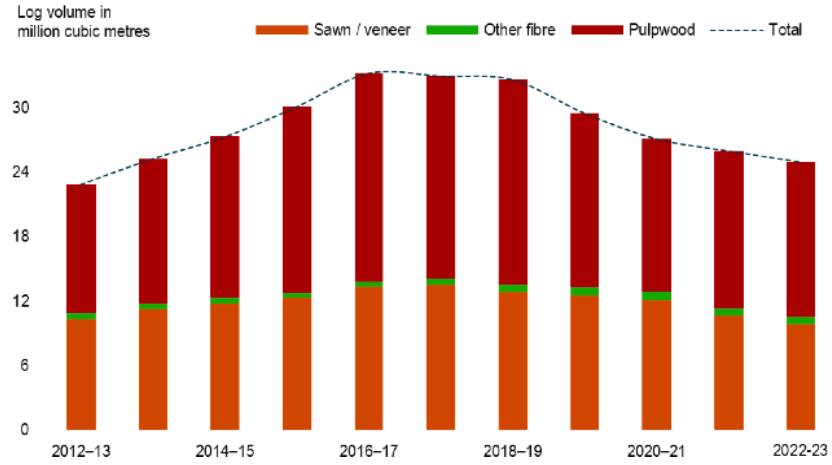

Figure 13 above from the strategy shows the breakdown of harvested log volumes.

While not separately identified this provides as a statistic that 91% of the harvested 25 million tonnes came from plantations. The second chart shows the breakdown of export volumes.

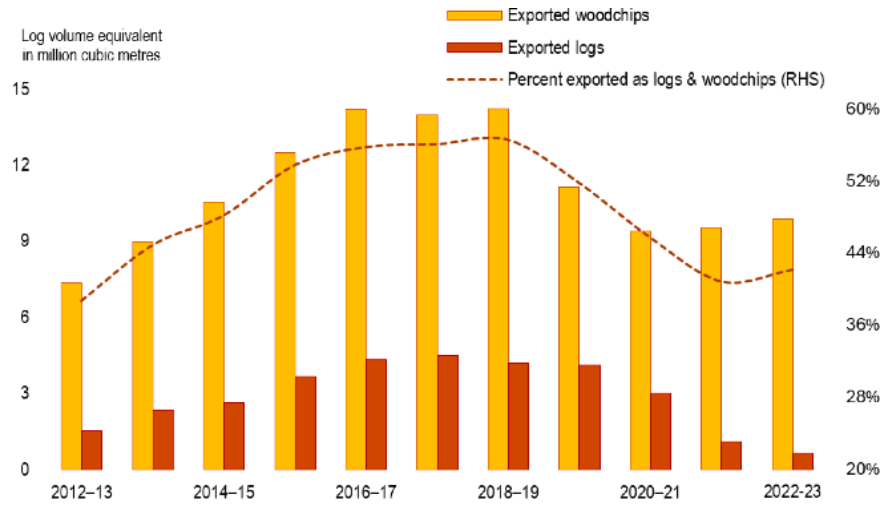

Figure 14 – Australia's Log and Woodchip exports since 2013.

The strategy has done all that it can to portray the plantation sector and native forest sector as inseparable. So, no breakdown is given beyond the statistical fact the only 9% of the log volume comes from native forest. However, by following the links to the source document[38],[39] more information becomes available.

Key findings

- *In 2022-23, the volume of logs harvested was 25 million cubic metres, a 3.9% reduction from 2021-22. Average unit values increased significantly over the same period, resulting in nominal gross value of production (GVP) of $2.44 billion, a 7% increase. However, nearly all the increase in unit prices was driven by recent high inflation, with real (adjusted for inflation) GVP remaining stable in 2022-23 compared to 2021-22.*
- *A reduction in the value of native forest harvest was offset by an increase in the value of commercial plantation production. The reduction in hardwood native logs harvested was driven mainly by a 78% decline in Victoria due to litigation actions brought against VicForests by environmental groups which restricted the areas available for harvest.*
- *The area of softwood plantations remained stable, while the rate of decline in hardwood plantation area eased as land areas have been converted to agricultural land uses.*
- *There was an increase in new plantation establishment in 2022-23. This included 3,800 hectares of softwood plantations and 700 hectares of hardwood plantations.*

This puts a different complexion on the narrative of the document. The whole premise of strategy 2 is that growth in fibre demand will continue unabated to the point that by 2050 the nation's annual average sawn softwood demand will increase by over 40% to over 6.5 million cubic metres a year. While not identifying any downside risks to the economy or wood production such as the rapidly escalating cost of climate change. That is not to say that the premise that further greenfield softwood plantation establishment is required are incorrect, but it seems likely that the aspiration is inflated.

The continued export of whole logs does not square with claims of log stocks in mills being at a high and projections of shortfalls. Despite steel framing costing up to 20% more than softwood timber framing demand for steel framing is growing. Softwood timber offers superior environmental outcomes at present so other factors including ease of construction, fire and pest resistance are at play. When green steel becomes a reality and government policy is driving for this then softwood framing will only compete on price. Making assertions that 468,000 ha of additional greenfield plantations are required somewhat heroic.

The Strategy acknowledges that competing demands for greenfield sites includes the renewable energy rollout. A forward looking strategy would see the promotion of holistic approaches to the restoration of native vegetation and agro-forestry with co-development of renewable energy particularly with wind energy proposals or elevated solar farms (e.g Mongolia). Wind energy proposals coexist very well and are a feature of the rollout in Scandinavia.

[38]https://daff.ent.sirsidynix.net.au/client/en_AU/ABARES/search/detailnonmodal/ent:$002f$002fSD_ASSET$002f0$002fSD_ASSET:1035883/one

[39] 'Australia's Sate of the Forests Report DAFF 2025 https://www.agriculture.gov.au/abares/forestsaustralia/Sofr

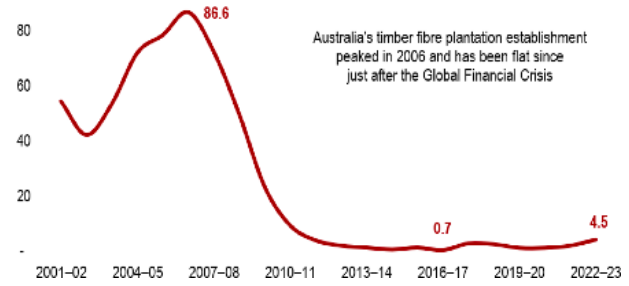

Figure 15 – New timber plantation establishment in Australia ('000s of hectares)

In 1990 the National Plantations Advisory Committee report into the establishment of plantations on cleared agricultural land provided a blueprint for investment into new plantations establishment. When the coalition government came into power all the safeguards in the recommendations were ignored and the 2020 Plantation Vision drove massive conversion in Tasmania and the development of a business model that could fairly be described as a Ponzi scheme. The cliff in the graph reflects the collapse of the MIS Ponzi scheme. Governments need to be very careful and learn something from past failures. That some in the Strategy are calling for tax incentives should send a clear warning.

The call for maintaining access to native forest is not supported by the data. Management of public native forests has spectacularly failed and survives on large, direct and indirect continual subsidisation.

In NE NSW hardwood plantation supply is subsidised and the Plantation Re-afforestation Act contains serious flaws. The Act enshrines a massive plantable area which encompasses native forests resulting in significant and ongoing conversion (deforestation) in the envelope since 2000. Very high conservation value remnant forests including Koala habitat are being lost[40].

While not saying it directly the whole narrative that has been constructed a) conflates softwood and hardwood demand by explicitly not treating them statistically separately and b) is all about explicitly increasing hardwood demand by seeking to massively grow the area of hardwood supply from public land but not to supply framing because softwood has that market.

"This calls for a bold strategy mix to ensure the Australian forest products industry can meet future domestic demands for timber fibre-based products through (a) maintaining operational access for timber fibre production from all currently allocated areas of sustainably managed native forest, (b) increasing the sustainable yield (i.e. productivity)) of these forests, (c) utilising unutilised residues from forests actively managed primarily for environmental outcomes, and (d) securing and deploying the required investment to expand the nation's timber plantation estate."

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[40] Tim Cadman, Kate Macdonald, Edward Morgan, Sean Cadman, Sikha Karki, Matthew Dell, Gregory Barber, Upama Koju, *Forest conversion and timber certification in the public plantation estate of NSW: Implications at the landscape and policy levels*, **Land Use Policy**, Volume 143, 2024. https://doi.org/10.1016/j.landusepol.2024.107179

It is noteworthy from the above that the one supply issue that may have a case made in the strategy, softwood supply, is relegated to last and folded in with hardwood plantations.

The whole section on 'timbre fibre from native forests should be read as a cautionary tale! Some of the more egregious examples are discussed.

"Many in the timber fibre industry will support management decisions based on clear science that protect non-timber forest values, such as set asides / reserves in forestry operations for the protection of threatened species (for example, eagle nests), extended / rehabilitated riparian zones to protect water quality and quantity, and protection of natural and cultural values. However, many decisions to withdraw native forests areas from harvesting access have not been based on science nor matched by coherent or realistic strategies for the replacement of withdrawn natural forest areas with plantations of native species for timber production."

Clearly many people don't support this contention which explains the construction used! This statement simply reflects the regulatory status quo. Calls for plantation resource security to nationally mirror the PRA Act in NSW actually reflect the desire to walk away from the norms referenced in this sentence and by implication would allow conversion.

Comments in the quoted text about the need for forest replacement policies do not reflect the realities of the role of timber as a material, sleepers and poles are a good example.

Wooden power poles consistently fail in bushfires and in turn can be a primary ignition source during high dry winds. The responsible authority in NSW has already identified that it will stop purchasing them. Concrete sleepers provide a better lifetime carbon profile because of their longevity as opposed to timber sleepers.

"There are many timber fibre products, including some of the most valuable and highly sort after products, that are best (and can only be) produced in sustainably managed native forests. Examples of these native timber products are featured of some of Australia's most iconic buildings such as the Sydney Opera House and the Australian Parliament House."

The suggestion from the sector that somehow they are the guardians of the most valuable and highly sort after products is risible. The industry logged product after to product to commercial extinction, from Australian Cedar in the north to Huon Pine in Tasmania in the south.

In Tasmania the introduction of clearfell logging for export woodchips saw millions of cubic meters of specialty timber species burnt in regeneration fires. Hence the age of the only two buildings quoted. This also suggests that rainforest logging should be started up again though it never stopped in Tasmania. There are currently zero impediments to accessing these products in Tasmania with over 40% of Tasmanian rainforests available for harvesting. At this point in the document it becomes completely internally contradictory on one hand arguing for unlimited access to native forests fibre via 'active management' on all tenures, on the other hand:

*"**A niche sector limited to high-value timbers**. This version of a long-term future for sustainable*

public native forest timber production sees it transition to a niche / boutique industry limited to high-value timbers and value-added fibre products sold into local industry / or is an Indigenous-led enterprise. Plantations will continue to be the source of industrial scale timber and fibre supply for the nation. "

This addition clearly was inserted to placate some in the industry. There is no specific strategy linked to this sentiment (although it is obliquely present in strategy 3) suggesting it reflects a minority view and is a green fig leaf.

STRATEGY COMPONENT	$	+	0	-
Invest in timber plantation expansion				
2.1 The Australian timber fibre industry will solve the "plantation resource gap" by making new plantation investment a key strategy priority, critical for both timber fibre competitiveness and to bolster Australia's sovereign capability in timber fibre products, specially building construction materials.			0	
2.2 The timber plantation expansion imperative will be framed as a "nation-building" initiative which speaks into our need to provide sovereign resources for the nation's use.			0	
2.3 Timber plantation expansion will be implemented in a consistent, measured way rather than in large, sudden swathes. The industry will also ensure that plantation expansion follows the principle of ensuring "the right trees and planted in the right place, at the right scale". This will allow for proper wood flow planning and sustainable yield increases and will foster greater social / community acceptance and the retention of social licence.		+	0	
Ensure access to land for new plantations				
2.4 Restricted access to, and unaffordability of, land for new timber plantation establishment will be actively managed and resolved through the industry deeply engaging in relationship-building and advocacy with local farmer groups and organisations such as the National Farmers Federation and kindred State farming associations.			0	
2.5 The industry will sponsor new, palpable timber plantation extension and engagement programs for farmers and other land managers, including field days, online advisers, and extension officers who can ensure real, on-ground engagement		+	0	
2.6 Industry leaders will work to break the pervading farming / forestry polarisation by adopting a "mosaic rural landscape" approach in appropriate regions, where trees can deliver various benefits to all landowners and to the community, including timber		+		

STRATEGY COMPONENT	$	+	0	-
2.7 State laws and regulations will be implemented to protect strategic timber plantation lands from alienation, such as compulsory land clearances under mining lease permits, and these will be harmonised for national application.			0	-
2.8 Governments and the industry will implement better communications to inform and educate relevant ministers and officials responsible for forestry, agriculture, environment, climate change, energy, housing and manufacturing of the benefits of an expanding plantation resource and continued access to sustainably managed native forests. *			0	
Secure a return on investment				
2.9 The timber fibre sector will leverage the opportunities created by vertical integration and locating plantations close to existing major timber fibre processing facilities (see NSW Central West case study), assisting to deliver suitable investment returns.			0	
2.10 The industry will implement programs to reduce the plantation investment feasibility gap including improving productivity per hectare, increasing preparedness and capacity to pay for logs, changing species, encouraging shorter rotations, greater utilisation of plantation harvest residues consistent with maintaining forest health, and employing technologies to improve timber harvesting, haulage and logistics costs.			0	
Capture and monetise carbon and other natural capital benefits *				
2.11 Given the significant carbon stores and sequestration potential of native forests, the government will develop appropriate ACCU Scheme methods that incentivise the sustainable management of native forests for carbon, other natural capital, and for timber production (as distinct from the proposed "avoided harvesting" approach that does not account for regeneration, increased growth rates or substitution).				-
2.12 The industry will leverage the provisions of the ACCU Scheme to generate carbon credits from new plantation establishment and management and promote the benefits of commercial plantings over non-harvestable (so called environmental plantings)				-
2.13 The government will advocate in international forums for forest based credits to be transacted between jurisdictions under the Paris Agreement's Article 6 rules on fair, science-informed terms without discriminating against commercial plantations and sustainably managed native forests.				-
2.14 The industry will promote the national benefits of an expanded timber plantation base to Australian superannuation funds and make them more aware of the investment opportunities, including for biodiversity, carbon and other natural capital products.		+		
*Secure a continuing role for public and private native forests**				
2.15 Governments will maintain access to existing native forest estates in their jurisdictions to avoid exposing Australia to sovereign risk through an over-reliance on imports of timber and other fibre. This will include the Australian Government requiring States and Territories to meet their obligations under Regional Forest Agreements to ensure forest areas are available for timber fibre production. *				-
2.16 Governments will provide funding and extension support for private native forest managers to restore their forests to a healthy state to secure their ongoing management to be certified to international standards and providing diversification opportunities for rural land managers. *	X		0	-

STRATEGY COMPONENT	$	+	0	-
2.17 Governments and the industry will collect and curate reliable, transparent, and timely data on the volumes and market prices / values for private native forest timber fibre and make them widely available to industry.	X		0	
Apply timely, science-based decision-making				
2.18 Forest management authorities will apply robust, objective science to future decisions regarding forest resource allocations and management..*			0	-
Promotion and credentials Enact "right to harvest" legislation in forests for timber production				
2.19 Governments will collaborate to implement a nation-wide "right to harvest" for all sustainably managed forests permitted for timber harvesting irrespective of jurisdiction and forest type. This will replace Local and / or State government consents for private native forest operations in their jurisdictions*				-
Regulate forestry land use consistently with other primary industries				
2.20 Timber production forests, including plantations, will be regulated according to "level playing field" principles, being afforded the same rural land use status as other farming and cropping enterprises. Landowners will be afforded a "right to establish" timber plantations, consistent with the principle of establishing "the right trees in the right places".			0	
Protect the forest resource from the adverse impacts fire and disease *				
2.21 The industry will implement effective fire risk mitigation and management systems including technology for early detection and rapid response, total fire ban protocols, proactive year-round infrastructure maintenance, and training of expert local fire teams.		+		
2.22 Governments will implement the recommendations of the 2014 *National Bushfire Management Policy Statement for Forests and Rangelands*, prepared for The Council of Australian Governments (COAG) to deliver a coherent, coordinated national bushfire strategy, including recognising the loss of timber plantation areas as constituting a material loss		+		
2.23 New statistical models will be developed and communicated to predict the likelihood of increased biosecurity threats (such as fungal attacks), and the optimal time to take protective action.		+		
Sponsor catalyst initiatives to attract plantation developments				
2.24 Governments will sponsor and support "regional catalyst initiatives" (such as affordable insurance, and a floor price for carbon) to attract and facilitate timber plantation expansion investments in those regions.	X		0	
2.25 Governments will provide ongoing direct financial incentives for new plantation development such as the current Support Plantation Establishment program[18], plus funded "trusted adviser" extension services for private landholders wishing to participate in timber, carbon and other markets. *	X		0	-

Further Analysis

2.8. Governments and the industry will implement better communications to inform and educate relevant ministers and officials responsible for forestry, agriculture, environment, climate change, energy, housing and manufacturing of the benefits of an expanding plantation resource and continued access to sustainably managed native forests. *****

This is a business-as-usual approach to communication and lobbying from Industry.

2.15. Governments will maintain access to existing native forest estates in their jurisdictions to avoid exposing Australia to sovereign risk through an over-reliance on imports of timber and other fibre. This will include the Australian Government requiring States and Territories to meet their obligations under Regional Forest Agreements to ensure forest areas are available for timber fibre production. *****

That this is even on the table is beyond absurd. There is no sovereign risk to wood supply and wood products in Australia. Risks to the industry stem from decades of government protection; failure of domestic policy to foster a strong internationally competitive timber industry; failure to recognise the ongoing risks to industry from overexploitation and under investment in biodiversity protection; failure to monitor forest ecosystem condition let alone develop protocols to improve the resilience and capacity of forests to resist, the impacts of climate change. Regional Forests Agreements have comprehensively failed to deliver their stated environmental and industry objectives. They are no longer fit for purpose in a world facing entwined existential crises of biodiversity loss and global warming. Each of these crises amplifies the other and neither can be solved unless they are solved together[41],[42].

As in 2.8 above a coordinated national response is required. Forestry Australia is actively positioned and much of the content of the strategy reflects their input[43].

Capture and monetise carbon and other natural capital benefits *

Three of the four elements of this strategy represent a serious attempt to corrupt climate integrity by maximising and extending accounting arrangements through Australian Carbon Credit Units. The term 'Net Zero derives from the Paris Agreement and UNFCCC goal of achieving a balance of emissions and removals in the atmosphere. It was never envisaged that this concept would be applied to individual sectors and entities – where it makes little if any real sense.

[41] H. O. Portner, R. J. Scholes, J. Agard, E. Archer, A. Arneth, X. Bai, D. Barnes, M. Burrows, L. Chan, W. L. W. Cheung, Scientific outcome of the IPBES-IPCC co-sponsored workshop on biodiversity and climate change. (2021).

[42] IPBES. (2024) Thematic Assessment Report on the Interlinkages among Biodiversity, Water, Food and Health of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. https://doi.org/10.5281/zenodo.13850054

[43] https://www.forestry.org.au/position-statements/

Land and forest carbon accounting challenges also exist at the country level where UNFCCC rules developed for these sectors are selective about which emissions are accounted and allow netting out within sectors that conceal emissions from logging. The same rules encourage a focus on reducing net annual fluxes of CO_2 into the atmosphere and ignore the importance of retaining carbon stocks in ecosystems and the importance of ecological integrity and biodiversity for reducing risks to ecosystem carbon stocks and long-term carbon storage in forests[44].

The Net Zero term has resulted in heavy reliance on offset mechanisms of varying quality being used to delay an exit from fossil fuels. Australia's reliance on offsets is second only to Kazakhstan. As we overshoot the 1.5-degree guardrail and rush towards 3 degrees of global warming, it is essential that offsets do not delay our exit from fossil fuels and that we do everything possible to reduce gross emissions. Every pulse of CO_2 has a long lifetime in the atmosphere – well beyond the UNFCCC 2050 deadline for achieving a balance of emissions and removals in the atmosphere.

Revisions to the safeguard mechanism next year are widely expected to start reducing Australia's reliance on offsets to 'meet' our emissions reduction targets.

In Australia carbon credit units or ACCUs are expected to meet integrity tests that ensure proposed project activities deliver 'additional' abatement, do not result in 'leakage' and deliver either 25 years or 100 years 'permanence'. Methods are highly complex. Establishing a counterfactual baseline is highly problematic in a sector undergoing inexorable decline. Independent monitoring and verification is expensive and generally weak, as serious critiques of several Australian ACCU methods attest to.

The Emissions Reduction Assurance Committee is currently considering a proposed Improved Native Forest Management ACCU method put forward by the NSW Government. Serious questions have been raised about the integrity of any estimated emissions reduction from the proposed activities particularly given uncertainties about the future viability of ongoing native forest logging, the inability to prevent leakage into private native forests and other states and the viability of the proposed 100-year permanence period in the face of rapidly escalating global warming. Examples of the concerns about this method were provided in submissions to the NSW government by Griffith University[45] and Wilderness Australia[46]. These systematically address the multitude of problems that the method throws up in terms of effectiveness and integrity. The Griffith University submission has been appended to this analysis.

2.18. Forest management authorities will apply robust, objective science to future decisions regarding forest resource allocations and management.*

This has been discussed elsewhere but is clearly aimed at shoring up the status quo. This

[44] "Submission on SBSTA 62 agenda item 14: Cooperation with other international organisations, Virginia , Young, Prof Brendan Mackey, Dr. Heather Keith, Cyril Kormos, An Lambrechts, Catalina Gonda

[45] https://www.griffith.edu.au/__data/assets/pdf_file/0029/2168525/INFM-ACCU-Submitted.pdf

[46] https://www.wildernessaustralia.org.au/wa_submission_accus

shouldn't be contentious, but it is, because the pattern largely set by the State-owned monopolies is to resist the application of robust objective science if it interferes with resource allocations. For at least 3 decades the philosophical underpinning of forestry science was 'adaptive management' this meant if something went wrong as a result of policy or was identified by research and field observations as a problem then changes would be implemented. The reality has been that those engaging with this philosophical approach as researchers, both forestry researchers and ecologists have found that where their research requires changes in resource allocation or silvicultural methods that change timber yields it is resisted or findings are simply ignored. Examples include decisions made to ignore hydrological research in water catchments over decades despite very clear evidence from multiple studies[47],[48],[49],[50] that continued harvesting would negatively impact on water yields; similarly the impacts on forest biodiversity have been demonstrated with no adaptive management beyond seeking political support for the status quo (see studies quoted above in discussions). The decision to ignore the recommendations of the independent consultant AUSTECO to the NSW EPA following the 2019/20 fires to protect all fire refugia, establish connectivity pathways to facilitate wildlife recovery across their natural range and prevent logging in 50% of each logging coupe for 20-120 years is a tragic case in point[51].

Adaptive management has now been incorporated into a new philosophical model 'active management' and is reviewed under Strategy 3.

2.19. Governments will collaborate to implement a nationwide "right to harvest" for all sustainably managed forests permitted for timber harvesting irrespective of jurisdiction and forest type. This will replace Local and / or State government consents for private native forest operations in their jurisdictions*

Given the abject failure of current approaches to SFM and the fact that no comprehensive assessment of the ecological values and condition of private native forests has ever taken place, this blatant grab for resource security in private native forests is shameless. Clearly aimed at native forest logging rather than plantation harvesting this represents a draconian overreach as right to harvest exists in one form or another in many jurisdictions.

[47] Dunin, F. X., Smith, C. J., and Denmead, O. T.: Hydrological change: reaping prosperity and pain in Australia, Hydrol. Earth Syst. Sci., 11, 77–95, https://doi.org/10.5194/hess-11-77-2007, 2007.

[48] https://www.ewater.org.au/archive/crcch/archive/pubs/pdfs/technical1999_1.pdf

[49] Chris Taylor, David Blair, Heather Keith, David Lindenmayer, Modelling water yields in response to logging and Representative Climate Futures, **Science of The Total Environment**, Volume 688, 2019, Pages 890-902, ISSN 0048-9697, https://doi.org/10.1016/j.scitotenv.2019.06.298.

[50] Chris Taylor, Heather Keith, David Lindenmayer, A widely employed water supply catchment model and other empirical insights suggest that logging may contribute to lower water yields,**Science of The Total Environment,** Volume 955, 2024, 177218, ISSN 0048-9697.

[51] Smith, A.P., "REVIEW OF CIFOA MITIGATION CONDITIONS FOR TIMBER HARVESTING IN BURNT LANDSCAPES. A Report to the NSW Environment Protection Authority" (2020);https://www.epa.nsw.gov.au/sites/default/files/review-of-cifoa-mitigation-conditions-fortimber-harvesting-in-burnt-landscapes.pdf.

2.25. Governments will provide ongoing direct financial incentives for new plantation development such as the current Support Plantation Establishment program18, plus funded "trusted adviser" extension services for private landholders wishing to participate in timber, carbon and other markets. *

Independent assessment of Australia's plantation supply needs, processing capacity and market growth areas is urgently needed. Otherwise, there is a high risk that plantations established on private land will end up without any market as did the failed MIS schemes. Rural extension to foster farm forestry and agro-ecological practices combined with biodiversity protection and restoration would be a good idea but there is a risk under this proposal that they could be used to justify wasteful or perverse outcomes. The provision of rural extension must be balanced by including conservation extension like that provided by the defunct Bushcare program and now being fostered through 'connectivity' programmes such as Gondwanalink Ltd (GLL) in the south of WA and the Great Eastern Ranges Initiative (GER) in NSW, VIC, QLD and TAS. Both these initiatives work with the Land Care Network, landholders and local and indigenous communities to improve climate resilience and mitigation and the recovery of biodiversity and ecological integrity on farms across large landscapes. They have also facilitated agro-ecological farm forestry.[52]

Strategy 3: Healthy forests, actively managed

In parts of the world the term 'healthy forests' is used to justify replacing old trees with young 'more vigorous' trees. The term is used in Canada to justify ongoing logging of old growth forests and in Europe to argue against allowing regrowth forests to reach ecological maturity. It is a dangerous 'greenwashing' term which ignores the superior ability of big old trees to resist threats that are increasing with climate change such as severe drought and fire.

The whole thrust of this strategy is predicated on a single definitional paper[6] cited above. The paper is not a work of research, rather a philosophical examination of a term sometimes cited in policy and research papers. The paper undertakes a thorough analysis of the term active management and from this has derived a definition for the Australian context and has used an existing framework from social theories of experiential social adult learning to illustrate it. A very important caveat appears in the paper:

"However, for introductory context, we focus on active management in policy documents for Victoria's forests – as a case study representing many of the challenges facing forest management in temperate Australia, including those posed by shifting societal expectations and changing climate and disturbance regimes."

Despite this the proposed definition is meant for universal application across temperate Australian

[52] Mackey B., Bradby K., Gould L., Howling G., O'Connor J., Spencer-Smith T., Watson D.M. and Young V. (2023). Connectivity Conservation: forging the nexus between biodiversity protection and climate action in Australia. Policy Discussion Paper 1/23. Climate Action Beacon, Griffith University, Queensland. DOI: https://doi.org/10.25904/1912/4644

forests:

"Active management is deliberate human tending of a forest or forest landscape by implementing practices or sets of practices to maintain and modify composition, structure or function towards a diverse range of potential purposes and goals. Active management sits within broader frameworks or approaches, which enact the overarching philosophy, paradigm and desired outcomes of forest management. "

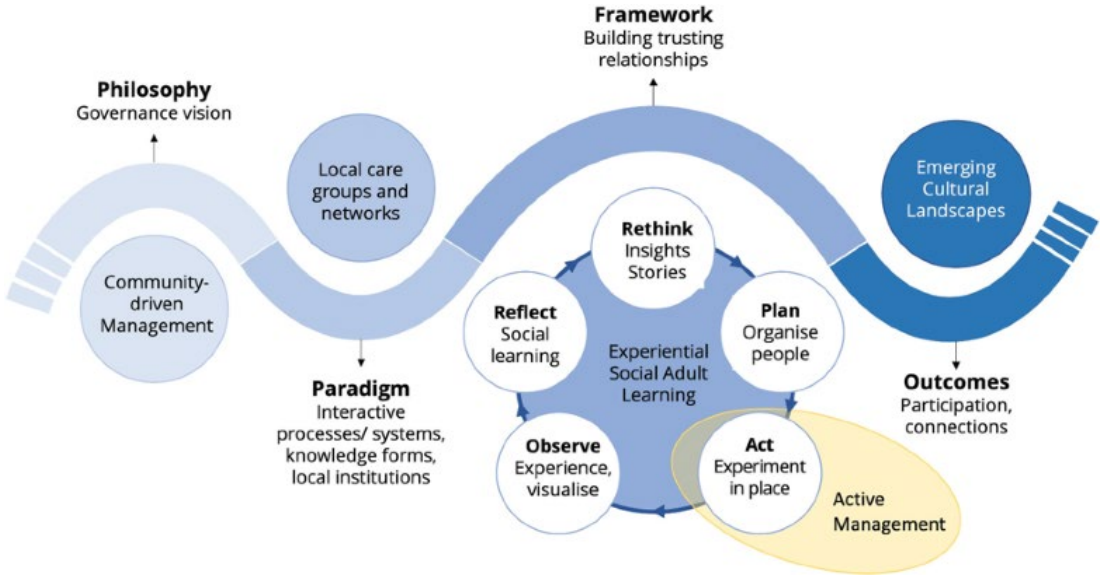

Figure 3. Example of a 'local communities' path applying a philosophy of community-driven management and a paradigm of interactive relationships with the intended outcome of emerging cultural landscapes. Active management is consistent with the 'act' step within a framework of experiential social adult learning

To a large extent the elucidation of an alternative term to adaptive management is a solution looking for a problem. Active management in a literal sense is currently practiced across all forest tenures in Australia through weed control, feral animal control, fire management, infrastructure maintenance and of course on forest production tenures through log removals and infrastructure development. The Strategy has seized on the term, or a more cynical perspective would suggest has generated the term, to provide a justification for fibre removals aka logging across all tenures in all forest types across the continent.

P60 "The ecological thinning now being undertaken in WA is an example of the benefits of active forest management in natural forests (see Appendix 2, page 133). A collateral benefit of such ecologically driven practices is optimisation of the use of residue timber fibre from actively managed healthy forests, contributing to Australia's domestic manufacturing sector and reducing imports of critical and desirable products. "

So how does the paper support fibre removals, where justified across all tenures and what is the research evidence for 'ecological thinning'. The paper itself is highly theoretical and abstract but

does present potential models of restoration seen through the lens of active management, on ecological thinning the paper is very tentative.

"For example, ecological thinning has many potential purposes, including encouraging larger stems sooner for habitat and fire resistance, enhancing tree recovery from drought and other stressors, reducing fuel loads, and increasing forest water yields (Baker 2023). Nonetheless, ecological thinning remains underevaluated in most forest types of temperate Australia, including minimal field-based evaluation of how thinning mitigates tree drought stress in eucalypt-dominated forests. This limits the scope for defining ecological thinning prescriptions and ensuring that thinning to low retained basal area does not exacerbate tree water stress (i.e. maladaptation) by increasing with-in-stand atmospheric dryness (e.g. André-Alphonse et al. 2023). Equally, although a few studies have examined the utility of thinning to reduce fire risks (e.g. Volkova and Weston 2019; Taylor et al. 2021a, 2021b; Weston et al. 2022), results relating to eucalypt forests 'demonstrate mixed outcomes' (Keenan et al. 2021), suggesting there will be ongoing challenges with developing ecological thinning prescriptions for fire risk, let alone multiple values."

The strategy itself uses the WA example of 'ecological thinning' in Jarrah forests. These practices are in turn supported by just two references[53],[54]. It is noteworthy that the authors in the quote above didn't cite this work and the ecological effectiveness of the practice has been contradicted in the literature[55].

The strategy is also seeking active management in Northern Australia forests despite these beyond the ambit of the definitional paper.

The strategy moves on to baldly state that forestry in Australia is sustainable. It then equates the certification of most public forests to either FSC or PEFC or both standards as proof of sustainability. FSC takes a slightly nuanced approach in its branding using the terms responsible management and sustainable management PEFC simply claims it certifies sustainable forest management. Neither scheme is perfect as you would expect from voluntary mechanisms. Not one of the large government-controlled forest management agencies have successfully achieved full FM certification under FSC but all are certified under PEFC. There are very real differences between the integrity systems in both schemes. Quintessentially PEFC certifies business as usual forestry so for example certifies old growth logging in Tasmania and still certifies forest conversion in NSW plantations. The strategy is seeking to leverage certification.

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[53] Burrows, N. *et al*. 2022. *A report on silvicultural guidelines for the 2024-2033 Forest Management Plan*. Western Australian Department of Biodiversity, Conservation and Attractions p.8

[54] Bradshaw, F.J. 2015. Reference material for jarrah forest silviculture, *Forest Management Series* FEM061, Department of Parks and Wildlife, Perth

[55] Wardell-Johnson Grant W., Schultz Beth, Robinson Todd P. (2024) Framing ecological forestry: applying principles for the restoration of post-production forests. Pacific Conservation Biology 30, PC24033. https://www.publish.csiro.au/pc/fulltext/PC24033

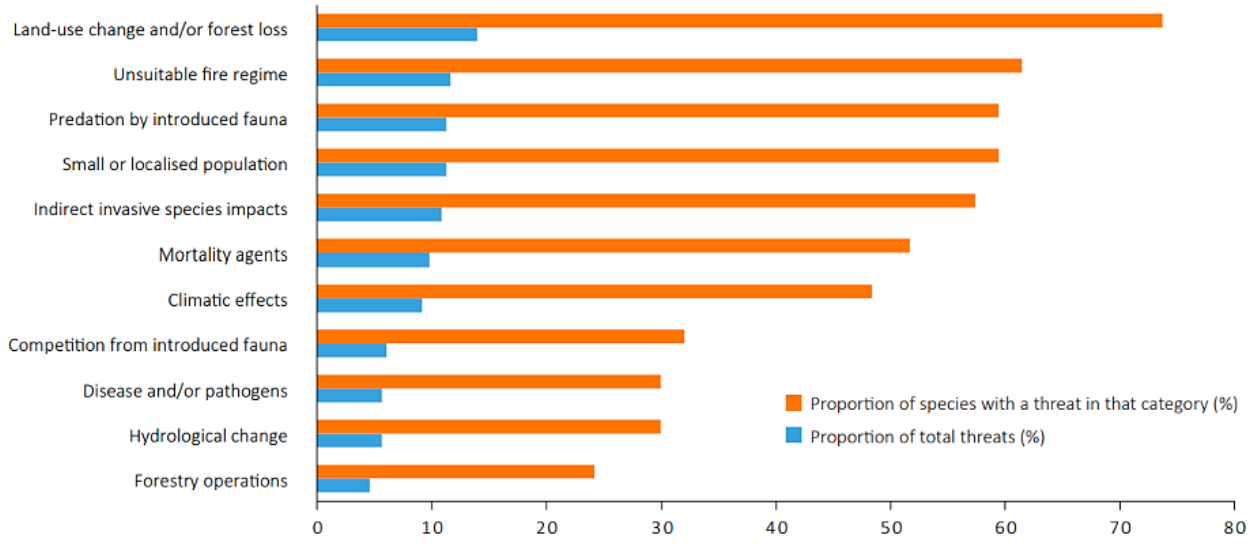
"the Strategy should highlight that certification schemes not only guarantee the sustainable management of forests but also support responsible and ethical supply chains while providing assurance of environmental, social, and economic sustainability."

It would be hard to find a forest ecologist that would agree with this assertion and as we note above the Samuel Review of the EPBC recommended that the exemption of RFA regions from federal environment laws be removed because of the patent failure of 'certified SFM' to protect and restore the habitat requirements of listed species.

The theme of the sustainability of forestry in Australia is further elaborated under the heading "Nature Positive, Nature Repair, and Net Zero". Where it seeks to demonstrate how active forest management meet these aspirations of government policy.

The lack of integrity in the argumentation is well demonstrated below.

P 58 "*It's important to note that the science-based implementation of active forest management represents a very low threat to forest-dwelling vertebrate fauna, a key biodiversity indicator.*"



The figure is a reproduction of data first produced in the State of the Forests report[56] and regurgitated in a recently released government propaganda ABARES publication[57], this document has been comprehensively debunked[58]. The figure assigns the impact on forest dependent threatened species broken down into a set of impactors. The strategy seeks to focus on the impact of 'active forest management' despite this not being one of impactors identified above. The data itself does not attempt to identify the synergistic impacts of interaction between these impactors for example 'forestry operations' which is graphed as the smallest impact can be

[56] https://www.agriculture.gov.au/sites/default/files/documents/Australia's State of the Forests Report Synthesis 2023.pdf
[57] https://www.agriculture.gov.au/abares/products/insights/australia-native-forests-and-wood-production
[58] Lindenmayer, D. B. (2025). *Cutting through the spin: Ten logging "myths" in the new ABARES report.* Fenner Internal Re-port No. 2025-01. Fenner School of Environment & Society, The Australian National University.

directly implicated in a number of the other impactors, hydrological change being the most obvious and the subject of decades of research demonstrating the impacts of logging and roading on hydrology, including impacts on both water yields and quality, for example multiple studies in Melbourne's water supply catchments[59]. These impacts in turn impact stream health and the species dependant on stream health.

Road infrastructure is commonly associated with the introduction of pests, diseases, exotic predators and arsonists. Roads are essential for forestry operations and robust research indicates that edge effects from roads include drying out forests making them more susceptible to drought and fire[60]. In the list of 'impactors' climatic change is the only one that cannot be directly associated with forestry operations - although climate stressors have been found to interact with past disturbance, including logging, to increase their severity.

Research in Australia and elsewhere indicates that climate change interacts with past logging to increase fire severity and that the age of forests matters for their ability to resist and recover from severe & catastrophic fire[61].

The strategy completely fails to identify how 'the science-based implementation of active management' will resolve the impact of active management on hollow dependent fauna. In the same way it completely fails to identify that old-growth logging is not sustainable under any circumstances, nor reflect on the role of native forests in achieving 2050 climate goals and the fact that any forest that has not been logged for 30 or more years cannot recover its lost carbon stock in less time than whatever its age at the time of logging.

The exposition on First Nations peoples is appropriate and long overdue but rather spoils this recognition in the quote below:

"*The industry is committed to continuing and improving engagement including, where appropriate, gaining free prior and informed consent which acknowledges the long standing role of Aboriginal and Torres Strait Islander peoples in actively managing forested landscapes for over 60,000 years and that this historical and cultural context aligns with and enhances the principles of active and sustainable forest management practices*"

This is actually trying to set up a false equivalence. First Nations land management was demonstrably sustainable over 60,000 years, 'active management' as currently practiced by the forest industry and articulated in this strategy is not. Empowering First Nations is a good thing. Unfortunately, there is a real risk that forestry becomes just another neo-colonial land grab. The Tiwi Islands conversion program is an unfortunate precedent.

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[59] https://ewater.org.au/archive/crcch/archive/pubs/pdfs/industry199804.pdf

[60] Ganapathy Narayanaraj, Michael C. Wimberly, Influences of forest roads on the spatial patterns of human- and lightning-caused wildfire ignitions, Applied Geography, Volume 32, Issue 2, 2012,Pages 878-888, ISSN 0143-6228, https://doi.org/10.1016/j.apgeog.2011.09.004.

[61] Nicholas Wilson, Ross Bradstock, Michael Bedward, Disturbance causes variation in sub-canopy fire weather conditions, Agricultural and Forest Meteorology, Volume 323, 2022, 109077, ISSN 0168-1923, https://doi.org/10.1016/j.agrformet.2022.109077.

There are good elements to this section of the strategy notably the biosecurity concerns are legitimate and should be supported but conflating this all with active management for healthy forests is trite. Unfortunately, many of the individual strategies / actions listed below are spin or greenwashing and some are dangerous or contradictory!

STRATEGY COMPONENT	$	+	0	-
Embracing objective, knowledge-based management				
3.1 Active forest management will be based on science and knowledge, including First Nations' knowledge of forests and Country, and will consider and recognise all the benefits and costs (environmental, social and economic) of each forest management activity.			0	
3.2 All Australian forests will be actively managed in accordance with a sustainability framework which will be independent, transparent and audited (for example, PEFC/ Responsible Wood, FSC).			0	
Applying active management to all tenures				
3.3 Australia's forest policies will embrace the principle of active and sustainable forest management irrespective of tenure and will support it at all levels of government, promoting it to consumers and the community.				-
3.4 Private native forest owners and managers will be educated on the forest health benefits resulting from active management.			0	-
3.5 Healthy, productive and commercial forests will be replanted on rehabilitating mine sites.			0	-
3.6 Governments will recognise, and other supply chain stakeholders will be encouraged to recognise, that forestry certification schemes not only guarantee the sustainable management of forests but also support responsible and ethical supply chains while providing assurance of environmental, social, and economic sustainability.			0	
Utilising all harvested fibre				
3.7 Active forest management will be primarily directed at enhancing forest health and resilience, adapting to climate change and mitigating risks, especially from fires and invasive species. In this context it can include the harvesting and utilisation of timber fibre from natural forests only where this activity contributes to the improvement or maintenance of a healthy forest.*		+	0	-
3.8 Recognise that, while the utilisation of fibre will not be the driver of active natural forest management, it can contribute to improved forest health and provide revenue to help offset active and healthy forest management costs.*		+	0	-
Informed by indigenous knowledge				

STRATEGY COMPONENT	$	+	0	-
3.9 The forest and wood products industry will increase its engagement with First Nations people and traditional custodians to utilise their knowledge of actively managed healthy forests, land and Country			0	
3.10 First Nations peoples/traditional custodians will have a regulatory environment where they can actively manage natural forests to restore them to health whilst providing other benefits including reconnection to Country, employment and income.	+			
3.11 First Nations peoples/traditional custodians will be enabled to heal Country and protect all Australians through fuel management, increased carbon capture and storage and increased forest productivity, creating resilient Country that is less prone to catastrophic fire.	+			
3.12 Active forest management will seek engagement with First Nations peoples as to their preferred ways to manage and maintain healthy forests, including on their Traditional Owner lands.	+			
Incorporating natural capital				
3.13 Actively managed Australian forests will be part of national Nature Positive and Nature Repair initiatives, projects under the Australian Carbon Credit (ACCU) Scheme, and will contribute to Australia's Net Zero Target across and within all forest tenures.				-
Proactively managing risk				
3.14 Governments, supported by the forests and wood products industry, will establish and maintain a biosecurity regime which protects all forests from external biosecurity risks.	+			
3.15 The Australian forest industry and governments will invest in technology, infrastructure and the human resources, skills and training needed to protect forests from unplanned high-intensity fires.	+			
3.16 Forest managers will apply active forest management principles toward countering and reversing biodiversity loss, especially of threatened species, and ecosystem fragmentation	+			
Recognising product and service credentials				
3.17 The environmental benefits of the downstream utilisation of timber fibre (for example, in construction and energy generation) from actively and sustainably managed forests will be recognised and this recognition will include consideration of the impact of the use of alternative substitute products (for example, concrete, steel and fossil fuels).				-
3.18 The industry and governments will work together to ensure the necessary regulatory and business environment exists to ensure all imported wood products only come from certified sustainably managed forests.	+			

Further Analysis

3.7. Active forest management will be primarily directed at enhancing forest health and resilience, adapting to climate change and mitigating risks, especially from fires and invasive species. In this context it can include the harvesting and utilisation of timber fibre from natural forests only where this activity contributes to the improvement or maintenance of a healthy forest.*

3.8 Recognise that, while the utilisation of fibre will not be the driver of active natural forest management, it can contribute to improved forest health and provide revenue to help offset active and healthy forest management costs.*

These two proposed actions are bizarre in that they appear to contradict most of the preceding narrative about logging everywhere, what they actually reflect is the intent in the definitional paper. It seems likely that these two proposed actions reflect a fight between the factions in the profession. Those who actually acknowledge that the profession has failed to deliver healthy and climate resilient forests and those who simply wish to maintain or expand access to fibre. In a sense it probably reflects the sentiment quoted under Strategy 2 about an alternative view of native forest utilisation and discussed above.

The strategy has tried to reconcile these very contradictory statements:

The text under "*Interrelationships*" in Strategy 3 is reproduced in full below:

Interrelationships

Sustaining adequate timber fibre supplies from actively managed healthy forests will also support Australia's acknowledged sovereign manufacturing imperatives. In Strategy 1 (*Building sovereign timber fibre manufacturing capability and capacity*) consultation with the industry and external stakeholders stressed the importance of strengthening Australia's capacity to deliver the wide range of products and applications using timber fibre as their raw material. These include housing, other construction, furniture, packaging, paper, chemicals, and bioenergy generation. But the industry also sees great opportunities for Australia to develop and utilise new products derived from timber fibre. The Strategic Forest and Renewable Materials Partnership's Forest Resource Security, Access & Management Working Group has recognised the link between a healthy, actively managed national forest estate and the provision of new products and services from those forests (see Figure 20).

Figure 20 - Interrelationships between investment drivers: forest managment,resource security and supply chains

It saw the interrelationships between active forest management, resource security and supply chains in the following terms:

"*... Active forest management, resource security (Strategy 2) and supply chains (Strategy 1) are all interrelated. Focusing on all components equally reduces risk of perverse outcomes and offers the greatest chance of success for the National Timber Fibre Strategy...*"

This more than anything else in the whole documents demonstrates the cynicism inherent in the strategy. The political take home message becomes don't worry about the detail in these three strategies just give us unrestricted access to native forests and direct and indirect subsidies for more plantations.

Strategies 4,5 & 6: Attracting and engaging people and other industry enablers, Supporting and growing regional communities & Innovating the timber fibre value chain.

The last three strategies are not forest focussed and most of the content, while often irritating, is mostly neutral. Only the environmentally perverse elements are identified and analysed.

Analysis

Many of the problematic issues already identified are promoted, Strategy four seeks to promote biofuels:

Affordable and reliable energy and other services

4.19 The industry will devise systems and technologies to utilise plantation and native forest residues for biofuels and bioenergy generation.

4.20 Governments will amend regulatory barriers to the responsible collection and utilisation of all sustainably sourced forestry and mill residues for energy generation and remove discrimination against wood fibre as an energy source, including the ability to realise renewable energy and / or carbon credits from such uses.

4.21 Governments will review and amend those current Energy from Waste (EfW) policies that may preclude or disincentivise the recovery and utilisation of timber fibre waste materials for energy recovery purposes.

4.22 The Government will engage with the industry to facilitate and promote a national biofuels and bioenergy strategy supported by the timber fibre sector to provide an attractive, low carbon, zero-emissions solution in Australia's critical national energy challenge.

Strategy 5 while again promoting active management resurrects the concept of 'working forests':

5.6. Governments and the industry will promote the benefits of active forest management and encourage the propagation of more "working forests", as distinct from purely conservation or protected areas.

Strategy 5 also seeks to capture First Nations forests into the production estate. This is far less nuanced than actions identified under Strategy 3.

First Nations' lands and practices

5.9. The industry will identify, facilitate and promote opportunities for the greater involvement and engagement with, and enhancement of indigenous communities in and through the nation's timber fibre sector.

5.10. The industry and governments will work with Traditional Owners and managers to achieve better integration of active management on those lands to produce multiple products (timber and non-timber, such as carbon and nature repair services)

5.11. Governments will enact explicit mechanisms whereby First Nations / Traditional Owners can benefit from active forest management on their lands across Australia and remove regulatory barriers to efficient engagement and collaboration between them and other land users (e.g. miners) for sustainable forestry developments.

5.12. Governments and the industry will include and enforce protections for Traditional Owners' rights and interests in relation to forest management and related activities, such as through Free, Prior and Informed Consent procedures.

5.13. Governments will work with First Nations to ensure that statutory and voluntary natural capital markets, such as the nature repair market, explicitly include First Nations' ecological practices as qualifying activities for crediting purposes.

5.14. Governments will work with First Nations to explicitly include indigenous active forest management as a qualifying activity within their nature repair market arrangements.

5.12 above is particularly concerning in that it seems to be constraining FPIC rights. What if First Nations peoples interests are in conservation of their lands? If this acknowledges that FPIC is required for engagement with resource extractive uses of First Nations forests its a good thing but could be read differently.

Strategy 6 seems to be seeking more research dollars which given the $150 million already allocated seems excessive. Research money is being sought to shore up the lack of science in respect of 'active management'.

6.14. Forest managers and researchers will develop the optimum combination(s) of forestry science and traditional indigenous land management practices to inform the best ways to ecologically thin actively managed forests, including protected forest lands.

The assumption is clearly that all protected forest lands should be available for fibre production.

Proposals around fire protection should be welcomed as it's one of the few areas of the strategy that aligns with science.

6.10. The industry and governments will boost research and innovation into advanced fire detection, early response, prevention, and cost-effective suppression mechanisms.

6.11. The industry and fire authorities will collaborate to ensure the benefits from new bushfire technologies can accrue to forestry-adjacent landholders, including public protected areas.

The appendices have not been examined in depth. The Appendix 3 which deals with carbon Markets should be comprehensively examined but as part of a separate review.

DISCUSSION AND RECOMMENDATIONS

Discussion

The strategy sets up the timber and wood fibre industries and forestry professionals for a new policy environment even less constrained than the current one. There is no suggestion that the science used to underpin Regional Forest Agreements should be updated to reflect current state of the forests which is particularly important given the damage to forest ecosystem integrity, wildlife populations, habitat and ecological connectivity from the 2019/20 fires. The ever-expanding list of endangered species and the threats of climate change to the integrity of forest ecosystems must be factored into any industry strategy. Instead, it offers specific strategies and actions, many of which are not supported by peer reviewed science, under a marketing slogan of 'healthy forests actively managed'. The main thrust is to expand the current plantation estate through a range of potential subsidy mechanisms based on a set of questionable assumptions around demand and to massively increase fibre flows from native forest by making all forests, regardless of tenure, available through 'active management'. It sees bioenergy as the principal end use of these increased fibre flows. Conservation science and ENGO engagement is disparaged. While advocating strongly for certification it ignores the realities that both schemes in Australia require active stakeholder engagement and at least pay lip service to best available information.

The agenda summarised above cannot be ignored this document has been in front of government since May 2025. There is little common ground with the current stated policies of most ENGOs what little there is, namely the acknowledgement of the need for much more ecologically robust fire suppression action and treating biosecurity risks seriously, should be supported.

While the acknowledgement of Australia's First Nations people is welcome the nature of the acknowledgement seems to be more about gaining access to timber resources and traditional knowledge however respectfully.

There are obvious internal tensions in the strategy although these are present, they are all resolved to deliver a consistently hardline message of resource security and increased access to native forest.

Recommendations

The most pressing need is for environment organisations active in the forestry space to come together and actually engage in the process to develop a new National Forest Policy.

As a matter of urgency there needs to be strongly articulated and united push back against the concepts and many of specific demands being articulated in the strategy.

An approach should at least be made to the environment minister for reciprocity for the

development of a Nationwide strategy document to encourage the development of a new National Forest Policy fit for the purpose of reversing the extinction crisis and improving the ability of native to forests to both resist and recover from threats that are increasing with climate change.

There needs to be continued and ongoing engagement with First Nations peoples to ensure they are aware of what has been proposed and the role being envisaged for their lands and knowledge systems.

The strategy does a great job of unifying policy objectives on climate and the forests albeit negatively.

In AR6 WG 111, the IPCC[20] recognised for the first time that 'protection offers the highest mitigation value of any action in the land and forest sector, providing a powerful counterpoint to industry claims about the climate benefits of logging.

The intellectual under pinning for getting the policy position on synergistic climate and biodiversity action right has also been provided by Griffith University in its submissions this year to the CBD and UNFCCC on building greater policy coherence between the 3 Rio Conventions[62]. International policy change to deliver synergistic climate and biodiversity outcomes to meet the goals of the 3 Rio Conventions and solve the entwined and mutually reinforcing climate and biodiversity crises is fast moving forward[63].

This provides an opportunity for domestic policy change and even carbon accounting rule changes to remove climate barriers to synergistic action.

Wilderness Australia and The Wilderness Society (Tasmania) have provided funds to help support the preparation of this analysis and contributed to its content.

[62] https://www.griffith.edu.au/research/climate-action/policy-development

[63] https://www.griffith.edu.au/_data/assets/pdf_file/0040/2174899/Final-CBD-Sub-on-forest-biod-work-prog.-14Apr25-1.pdf