

Productivity Commission Report Net Zero Investing in cheaper, cleaner energy and the net zero transformation Interim report Submission by John O'Donnell 12 September 2025

1 Introduction

Page ii of the report notes. *The Productivity Commission (PC) is the Australian Government's independent research and advisory body on a range of economic, social and environmental issues affecting the welfare of Australians. Its role, expressed most simply, is to help governments make better policies, in the long-term interest of the Australian community.*

I believe an essential responsibility of the Productivity Commission is to not get caught up in failure net zero approaches that effectively result in many areas of productivity decline, many areas of productivity inaction, reduced industry, lost opportunities, inaction in relation to disaster management (and increased carbon emissions) and inadequate fuel mitigation, and reduced adaptive management in our forests involving poorly selected failed carbon methods.

And then on Page iv I see “Australia’s productivity growth in the decade to 2020 was the slowest in 60 years”. This is alarming.

I have major concerns that this report is not going to take us to new productivity heights across net zero investing in cheaper, cleaner energy and the net zero transformation economic, social and environmental issues affecting the welfare of Australians. The report, I believe, doesn't adequately help governments make better policies, in the long-term interest of the Australian community, I suspect most of our parties aren't prepared to latch onto the key productivity issues.

2 Submission concern areas

Key submission concern areas are outlined below.

2.1 Market mechanisms misuse to reduce carbon emissions based on false science, regulatory/political misuse and regulatory creep

Pg 7 of the PC report notes.

Enduring, broad-based market mechanisms are the best way to reduce carbon emissions. Governments have made progress on adjusting policy settings towards this goal (through reform of the Safeguard Mechanism, for example), but providing more consistent and comprehensive incentives to reduce emissions would help us reach net zero at a lower cost.

I have serious doubts in relation to this commentary. As outlined in detail, Annexure 1 is my submission to the NSW Government Proposal to close or reduce native forestry harvesting using a carbon method approach John O'Donnell 23 June 2025. I also forwarded it to the applicable federal agency climate change committee.

As outlined in this submission, important science by Venn, Raison and many others has been ignored, supporting forestry. The NSW government/ organisation appears to have very limited understanding of tree growth rates as trees get older and other concerns raised in this submission.

The method asks:

Does stopping timber harvesting generate better climate outcomes than continuing harvesting and regrowing forests?

Yes. In Australian native forests, the level of carbon sequestration is higher if forests are allowed to grow old compared to cutting and harvesting them on a 40 to 80-year cycle. This is explained in detail on pages 22–23 of the INFM Method proposal design outline.

I challenge this as outlined in my Submission, Venn, Raison and many many others challenge this as well.

Important concerns in relation to the push to stop or reduce native forestry logging under an expanded carbon credit scheme are outlined in this submission. 12 concerns are outlined and they are all important, questioning the value of such a proposal to stop or reduce native forest harvesting.

Attempting to stop native forestry for so called imaginary climate change credits/ method is not the answer, seriously, again ignoring many key factors and science.

And the importance of forestry in reducing intense bushfires and prescribed burning/ adaptive management/ bushfire suppression over the last century is conveniently ignored. Foresters have never adopted a wait for a while approach to fighting bushfires.

I do not understand how this method was shortlisted considering the information this submission has provided. And I am shocked that the Forests Australia resilience method was not shortlisted.

Lock up management does not work, adaptive management does, and it is totally unclear to the author why Australia and some governments would consider closing or reducing native timber harvesting/ thinning, including within dense, high fuel load areas and areas suffering from eucalypt decline, to attempt to gain carbon offsets.

Seriously, this proposed NSW method should be withdrawn.

It would be opportune for NSW to consider a carbon method based on closing conservation areas and bringing in prescribed burning and adaptive management, like the US understands and is doing.

Why not consider a carbon offset scheme across SE Australia based on increasing prescribed burning rates across landscapes/ states of around 8 % of forests per year to reduce greenhouse impacts of megafires and failed fire regimes? This question doesn't seem to get asked, the focus appears to be on stopping native forestry harvesting, which is a massive part of the solution.

It is important that Forestry Australia has submitted an alternative carbon method proposal for consideration under the Proponent-Led Method Development Process for the ACCU Scheme called Enhancing Native Forest Resilience. This focusses on improving the health and resilience of native forests and encouraging active, adaptive management of native forests across all land tenures to assist Australia in meeting its Paris Agreement targets, all important issues. This is the way forward, but green activism again stands in the way.

The US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation provide an effective approach to reducing fuels, increasing prescribed burning, improving forest health and forest resilience and expanding community wildfire mitigation work, reducing the extent and impacts of wildfires and consequent carbon emissions. This provides a model for Australia, a practical approach and not an offsets scheme.

Opportunities to realise carbon and biodiversity benefits using native forestry science and adaptive management are outlined in Section 13 (Annexure 1).

Steadily and surely, Australia is undertaking extreme regulatory creep, poor policy and endless bureaucracy and is going backwards. Current environment outcomes are disastrous since progressive closure of forestry, and it is going to get much worse. The US gets it, this country doesn't and the way it is going carbon losses in forests are going to be huge.

An Opinion piece by John O'Donnell – closing or reducing native forest harvesting using carbon/ greenhouse offsets. Daily Timber News 9 May 2025 provides further detail:
<https://www.timberbiz.com.au/opinion-john-odonnell-closing-or-reducing-native-forest-harvesting-using-carbon-greenhouse-offsets/>

Further concerns and commentary is provided below:
<https://www.abc.net.au/listen/programs/the-radio-national-hour/why-are-companies-quitting-australias-carbon-credits-scheme/105320656>

<file:///C:/Users/jross/Downloads/Final-Report-Leakage-Modelling-Review-of-Proposed-INFM-Method.pdf>

And important approaches supporting forestry across the world and greenhouse management is outlined below:

<https://timberbiz.us12.list-manage.com/track/click?u=ac41575cbca450f7966070392&id=e2b70ee67f&e=1276d98ac8>

When and if such a NSW crazy scheme is approved (I understand to pay for the great koala national park) and all the truth comes out, Australia will become a laughing stock across the world, and rightly so.

2.2 Bushfire management and better carbon management, which is what net zero is about

Page iv notes:

Investing in cheaper, cleaner energy and the net zero transformation

Comment

There is more to this issue that needs to be considered, as outlined in this submission.

Page 55. Increasing the resilience of housing to bushfire and other hazards will be a significant undertaking. It will need action from governments and individuals.

The PC document is very house disaster orientated and does not consider the productivity and carbon retention benefits of improved bushfire mitigation.

There are many applicable documents, that if considered adequately, can greatly improve carbon management in our forests in Australia:

Opportunities for improved fire management in Australia: John O'Donnell <https://arr.news/2022/11/08/forest-fuel-forest-resilience-and-risks-of-severe-bushfire-usda-fact-sheets/>

Post on Park Off Facebook site 3 August 2025 in relation to a US paper by Yackulic et al (2025) Rising from the Ashes: Treatments Stabilize Carbon Storage in California's Frequent-Fire Forest <https://www.frontiersin.org/journals/forests-and-global-change/articles/10.3389/ffgc.2025.1498430/abstract>

Assessment of the impacts of large, severe and intense bushfires across South East Australia: John O'Donnell ARRN 21 July 2025 <https://arr.news/2025/07/21/assessment-of-the-impacts-of-large-severe-and-intense-bushfires-across-south-east-australia-john-odonnell/>

Massive Australian bushfire impacts: it's our fault One Line Opinion 15 July 2025 <https://www.onlineopinion.com.au/view.asp?article=23561>

O'Donnell J (2023) Contributory factors that influenced fuels, forest fire resilience, bushfire attack, safety, impact, cost, bushfire extent and intensity of the 2019/ 2020 major bushfires across south eastern Australia, Australian Rural and Regional News 4 August 2023. With Annexure. <https://arr.news/2023/08/04/the-2019-20-bushfires-contributory-factors-john-odonnell/>

<https://www.crikey.com.au/2025/05/23/carbon-neutral-greenwashing-battleground/>

Its time to start listening and addressing all the fuel and climate issues soundly, in an integrated way, as is happening in the US. Or has Australia become too green and activist driven? Past PC reports understood the inadequate fire and flood mitigation, or has this gone to history? Lack of fire mitigation is highly correlated with poor carbon outcomes.

2.3 Ongoing conservation lock up failures and carbon loss

Key coverage of massive loss of carbon storage is outlined in a detailed review and article, The NSW Alps 5 years after the 2019/2020 bushfires. Opinion and opportunities review John O'Donnell Daily Timber News Monday 23 June 2025 4 April 2025

<https://www.timberbiz.com.au/the-nsw-alps-5-years-after-the-2019-2020-bushfires/>

This detailed review highlights what is happening to our forests/ conservation areas under crazy fire regulation, policy and requirements for low intensity fire management in NSW and other SE states.

Just one key photo is included here, there are many more in the review, highlighting massive ecosystem and carbon impacts in an alpine park in NSW, KNP:



It is easy to work out the opportunity areas to increase carbon capture, I have identified large numbers of them in detail in the review, to start turning around fire management and carbon retention in forests and conservation areas.

A brief Opinion Piece by John O'Donnell "Consideration of ongoing forest conservation lock up failures across SE Australia, who is paying for all this, and ways to progress this collectively. 2 pp. 15 May 2025 Howitt Facebook Page briefly considers the implications of this matter, including increased greenhouse impacts.

[https://www.facebook.com/download/982810860683006/Issues%20that%20I%20believe%20are%20being%20missed%20in%20lock%20up%20debates%20whos%20paying.pdf?av=100049160648837&eav=AfbZjirb0U6WvIE7aSXjzqs-EvIA7R6XIkEPUNTW2UqBJSTB1wfF77LgUWExVSPn9Gc&paipv=0&ext=1754883378&hash=AcqBY7yKCyVF4kfMteY&cft_0\]=AZV0FGUDB72odDijeKwkMap7gEwJNUgVhZ8ECtS9WWolQxi5xw8ZMtzssXipECE933eDxCmXsTimgyJygfLhBiE8XsQYXNYUhcSroS8FrozDNqJGtMRn1kZjoGtW9ckO24zIXwPaWlJFWhtv7lpWycOTYaryi5uChKowoOSTMW2j15rM9GV-jRBJ82oJXZzUF6F4aIY_atHclnyCnfRstnA-&tn_ =H-R](https://www.facebook.com/download/982810860683006/Issues%20that%20I%20believe%20are%20being%20missed%20in%20lock%20up%20debates%20whos%20paying.pdf?av=100049160648837&eav=AfbZjirb0U6WvIE7aSXjzqs-EvIA7R6XIkEPUNTW2UqBJSTB1wfF77LgUWExVSPn9Gc&paipv=0&ext=1754883378&hash=AcqBY7yKCyVF4kfMteY&cft_0]=AZV0FGUDB72odDijeKwkMap7gEwJNUgVhZ8ECtS9WWolQxi5xw8ZMtzssXipECE933eDxCmXsTimgyJygfLhBiE8XsQYXNYUhcSroS8FrozDNqJGtMRn1kZjoGtW9ckO24zIXwPaWlJFWhtv7lpWycOTYaryi5uChKowoOSTMW2j15rM9GV-jRBJ82oJXZzUF6F4aIY_atHclnyCnfRstnA-&tn_ =H-R)

2.4 Piecemeal disaster approaches across Australia is greatly contributing to increased greenhouse generation

The piecemeal disaster mitigation approaches across Australia are not reducing disasters across Australia, nor the huge greenhouse gas impacts of these disasters, including bushfires and floods.

This is outlined within "Actioning the piecemeal disaster mitigation approaches across Australia On Line Opinion John O'Donnell 18 June 2025":

<http://www.onlineopinion.com.au/view.asp?article=23523>

Its well past time to tackle fire management and disaster management and start getting some wins for Australian forests, flora, fauna and climate/ carbon storage.

2.5 Climate change focus misses massive bushfire and flood risks

The report notes:

Australia faces significant climate-related risks regardless of future emissions reductions. Over the longer term, boosting our resilience to climate perils has the potential to lower the costs of disaster recovery.

Productivity benefits will also flow from a healthier population, and our quality of life will improve.

Comment.

Hold on, this is so focussed on the climate side of disaster management and resilience to climate perils. It is a generic statement and not aligned with reality with what is going on in Australia with pathetic fuel and fire management.

The report is not at all focussed on disaster mitigation, and reducing fuels in our forests across landscapes and increasing resilience of our forests to bushfires, failing to identify and capture this massive issue in relation to carbon.

I suggest the PC should do better in relation to this, a number of past PC reports have identified inadequate fire mitigation in Australia.

Has the over zealous climate focus now killed the past focus on mitigation off? Fire mitigation remains a critical issue, now more so with seral stages in forests going backwards, more and more fuel, lower strata, dense understories and minimal fire preparation.

The document below is offered for assistance (not as detailed re the climate side though):

<https://volunteerfirefighters.org.au/identifying-and-actioning-key-bushfire-disaster-economic-efficiency-and-accountability-lessons-and-insights-from-across-australia-john-odonnell-7-february-2025#:~:text=Number%20of%20responding%20to%20bushfires>.

I personally suggest that this document is going to fail before it gets started under such one sided approaches.

2.6 Disaster mitigation to reduce cost of living, community disaster costs, insurance costs and budget costs, productivity and carbon storage

Across Australia, there are huge disaster costs, costs of living pressures and massive productivity concerns, and this doesn't get considered by the PC.

I understood that the PC was an advisory body on a range of economic, social and environmental issues affecting the welfare of Australians. Disaster mitigation to reduce cost of living, community disaster costs, insurance costs and budget costs and productivity issues are critical, and they are linked to achieving net zero and reducing greenhouse gases.

Useful reports include:

<https://volunteerfirefighters.org.au/increasing-cost-of-living-natural-disasters-and-rising-insurance-costs-its-time-for-disaster-mitigation-action>

<https://volunteerfirefighters.org.au/increasing-cost-of-living-and-rising-insurance-costs-for-businesses-and-homeowners-in-australia-its-time-for-dramatically-increased-disaster-mitigation-action>

Just 3 per cent of disaster funding is invested prior to an event to reduce the impact of future disasters, as noted in a Deloitte Access Economics (2022) report <https://www2.deloitte.com/content/dam/Deloitte/au/Documents/Economics/deloitte-au-dae-economic-reality-check-minderoo-foundation-17012022.pdf>: This percentage may have changed a little with the DRF funding.

As an example of natural disaster costs, the 2019/ 20 bushfires burnt over 17 million hectares and they were also very costly, estimated by AccWeather to be \$110 billion in terms of total damage and economic loss. <https://www.accuweather.com/en/business/australia-wildfire-economic-damages-and-losses-to-reach-110-billion/657235>

If Australia starts managing fire mitigation effectively, as in SW WA and northern Australia, forest bushfire safety and community safety will be significantly improved.

And the carbon impacts of huge megafires across landscapes will be significantly reduced.

2.7 Huge environmental and carbon impacts of many renewable projects

There is increasing concern in Australia to the environmental impacts of renewable energy projects. This concern is justified.

Such projects include Snowy 2, and wind, solar, boost hydro, battery and other projects across Australia.

The huge costs and impacts of renewable energy projects needs much better consideration, at a time when power costs are surging through the roof and key industries closing/ being closed.

2.8 Why only the focus on housing and the critical importance of town and city bushfire and flood protection

The report notes:

Housing warrants specific policy attention. Large organisations likely have strong incentives and capacity to invest in resilience, and some face obligations regarding disclosure of the risks they face and how they are addressing them. The Australian Government can support household action by leading the development of a publicly accessible database of all climate hazards, and an outcomes-based resilience rating system for housing and guidance on how to act. All levels of government have an interest in making our housing more resilient. They should work together to agree on quantifiable goals for improving housing resilience over the coming decades, and targeted policies to achieve those goals.

I ask why the focus is only on houses and not the protection and resilience of towns and cities. Town and city bushfire protection case studies where prescribed burning and other adaptive management and mitigation have assisted in restricting bushfire impacts on communities across Australia and the U

A useful document is:

Town and city bushfire protection case studies where prescribed burning and other adaptive management and mitigation have assisted in restricting bushfire impacts on communities across Australia and the US. And article Mitigating bushfires: How AU & US towns are reducing risk, Friday Offcuts 30 May 2025.

<https://www.timberbiz.com.au/wp-content/uploads/REVIEW-Town-prescribed-burnmitig-protection-JOD-FIN.pdf>

2.9 Regulations, more red tape, more method failures and not improved productivity

Pg 1. Governments can do much without compromising either the energy transition or the environment. Overdue reforms to national environmental laws – to introduce national environmental standards, facilitate regional planning, make offsetting more efficient and clarify engagement requirements – are a priority. The Environment Protection and Biodiversity Conservation Act 1999 should also be changed to allow decision-makers to consider the fact that a project is important to

Australia's clean energy transition. Regulatory resources should be focused on assessing important energy projects.

Comment.

Sorry, I don't believe this for one minute. Governments rarely focus on reducing red tape and reducing regulation, especially Labor ones. The EPBC legislation will never get changed to reducing red tape and reducing regulation, it increases it. And it will be used to close more primary industry.

If the PC really supports reducing red tape and reducing regulation, I suggest the PC needed to be much clearer re the effective and sensible productivity and natural measures needed and be strong re this. Not more activist red tape and control mechanisms.

2.10 Climate Change Authority responsibility

Give the Climate Change Authority responsibility for monitoring, evaluation and learning regarding adaptation policy and

To support economy-wide adaptation, the Australian Government should legislate for the Climate Change Authority to take on responsibility for monitoring, evaluation and learning in adaptation policy.

Comment

I suggest that this will never work, this organisation is way too green and I believe will very likely take us to more and more non-productivity areas, side with green groups, support inadequate science and be a failure.

3 Conclusions

I have identified 10 concern areas in this submission.

Current bushfire management, regulation and policies is atrocious and resulting in intense bushfires over landscapes. Regulation and policies are all set by conservation agencies, who do not change anything and problems are worse every year. Just go for a drive in KNP, Gospers Mountain national parks, the south coast of NSW, and Victorian forests and all should become evident, setting up more and more high intensity, high severity and long duration bushfires.

I believe an essential responsibility of the Productivity Commission is to not get caught up in failure net zero approaches that effectively result in many areas of productivity decline, many areas of productivity inaction, reduced industry, lost opportunities, inaction in relation to disaster management (and increased carbon emissions) and inadequate fuel mitigation, and reduced adaptive management in our forests involving poorly selected failed carbon methods.

As noted on Page iv I see "*Australia's productivity growth in the decade to 2020 was the slowest in 60 years*". This is alarming.

I have major concerns that this report is not going to take us to new productivity heights across net zero investing in cheaper, cleaner energy and the net zero transformation economic, social and environmental issues affecting the welfare of Australians. The report, I believe, doesn't adequately help governments make better policies, in the long-term interest of the Australian community, I suspect most of our parties aren't prepared to latch onto the key productivity issues, especially the lower cost concerns and opportunities that I have raised in this submission.

Annexure 1 Proposal to close or reduce native forestry harvesting using a carbon method approach
John O'Donnell 23 June 2025

Proposal to close or reduce native forestry harvesting using a carbon method approach

John O'Donnell 23 June 2025

Contents

1	Major concerns with the proposed method to stop or reduce native forestry logging using selected anti-forestry carbon method/ greenhouse offset science	10
2	The science supporting native forestry and carbon capture is totally ignored in setting up a scheme to close forestry	13
3	Increased mega bushfire occurrences and intensity across SE Australia, including large areas of locked up conservation areas and adding further to these, and consequent huge carbon emissions	16
4	Failures of lock up management and policies across SE Australia and consequent carbon impacts	20
5	Loss of adaptive management opportunities to optimise carbon capture	20
6	Loss of forestry firefighting resources for effective firefighting and suppression and bigger bushfires and carbon emissions	21
7	No consideration of increasing eucalypt decline and associated carbon storage/ greenhouse impacts	21
8	No consideration of important new climate science by Fasullo	21
9	Ignoring dramatically increased and increasing insurance costs under the failed conservation fire intervals, ongoing forest lockouts and conservation lockups	22
10	Ignoring the poor biodiversity outcomes occurring under the failed conservation lockup approach, poor fire policies and regimes and repeat intense bushfires and poorly considered carbon approaches	22
11	Political games underway to end or markedly reduce remaining native forestry and consequently increase carbon impacts	22
12	Other concerns in relation to the proposed carbon method	23
13	Opportunities to realise carbon and biodiversity benefits using native forestry science and adaptive management	23
	Opportunity 1. Ensure that native forestry harvesting and adaptive management retains a vital role to play in tackling climate change and biodiversity/ adaptive management, this opportunity area is expanded across SE Australia and that native forestry is supported	24
	Opportunity 2. Ensure active and adaptive management applies to SE Australian forests as used across US forests under US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation	24
	Opportunity 3. Address opportunities raised in the Venn report in relation to carbon and biodiversity benefits provided by forestry	24
	Opportunity 4: Reduce intense bushfires, carbon emissions and risks to SE Australian forests	24
	Opportunity 5. Address the ongoing failures of conservation management across SE Australia in relation to bushfires, carbon and biodiversity and most importantly policies	25
14	Conclusions	26
	References	27

- 1 Major concerns with the proposed method to stop or reduce native forestry logging using selected anti-forestry carbon method/ greenhouse offset science

Improved Native Forest Management in Multiple-use Public Native Forests | Park management | Environment and Heritage

What activities will generate Australian Carbon Credit Units?

The activities that will be eligible under the proposed INFM Method are limited to: stopping timber harvesting and deferring timber harvesting, in publicly owned native forests that are designated for commercial forestry use.

How does stopping or deferring timber harvesting generate carbon benefits?

Stopping or deferring harvesting in native forests abates greenhouse gases by: avoiding the emissions associated with harvesting (releasing the carbon stored in forests into the atmosphere) increasing the amount of carbon stored in the forests by allowing them to grow older.

Comment.

As outlined in this submission, important science by Venn, Raison and many others has been ignored, supporting forestry. Your organisation appears to have very limited understanding of tree growth rates as trees get older and other concerns raised in this submission.

Does stopping timber harvesting generate better climate outcomes than continuing harvesting and regrowing forests?

Yes. In Australian native forests, the level of carbon sequestration is higher if forests are allowed to grow old compared to cutting and harvesting them on a 40 to 80-year cycle. This is explained in detail on pages 22–23 of the INFM Method proposal design outline.

Comment.

I challenge this as outlined in my Submission. Venn, Raison and many others challenge this as well.

Does the INFM Method provide for carbon credits from forest management activities such as fire management, weed control, ecological thinning and low impact harvesting?

No. The proposed INFM Method does not provide carbon credits for these types of activities. This is because they are subject to high additionality risks (i.e. it is extremely difficult to design rules and processes to confine eligibility to instances where the conduct of the project activities is contingent on the provision of carbon credits) and/or there is significant uncertainty about whether the activities will reduce net emissions into the atmosphere.

Comment.

I challenge this as outlined in my Submission. Venn, Raison and many others challenge this as well. The US approaches are way smarter than ours. What sort of government would allow such an approach, it is just ludicrous. You really need to consult Venn, Raison and many experienced foresters.

Carbon Credits (Carbon Farming Initiative— Improved Forest Management in Multi-use Public Native Forest) Methodology Determination 2025

Part 2—Offsets projects to which determination applies

6 Determination applies to projects to stop or reduce timber harvesting in public native forests

(1) For paragraph 106(1)(a) of the Act, this determination applies to an offsets project:

(a) that:

(i) removes carbon dioxide from the atmosphere by sequestering additional carbon in trees and debris **in public native forests as a result of a decision of the government of a State to stop or reduce timber harvesting in those forests;** and

(ii) **avoids the emission of greenhouse gases attributable to timber harvesting in those forests;** and

(b) that can reasonably be expected to result in eligible carbon abatement.

(2) Forest management activities may be undertaken in the public native forests to which an offsets project applies.

7 Projects to stop timber harvesting

(1) An offsets project to stop timber harvesting is a project to stop timber harvesting indefinitely.

Note: Sections 17 and 18 provide that eligible offsets projects must have a 100-year permanence period and provide for the relinquishment of carbon credits if harvesting is resumed during that period.

(2) An offsets project to stop timber harvesting may relate to stopping timber harvesting across the whole of the project area or only in one or more parts of the project area.

(3) An area in which timber harvesting is stopped under an offsets project is a carbon protection area.

(4) **A carbon protection area cannot be removed from an eligible offsets project or reduced in size,** but additional carbon protection areas can be included in the project or an existing carbon protection area can be increased in size.

(5) If timber harvesting is stopped in only a part of the project area, the whole area remains the project area for this determination.

Note: Section 12 provides that the minimum project area must include the commercial public native forests in at least one whole forestry region. Even though an offsets project may relate to stopping timber harvesting in a part only of the project area, the modelling of carbon stock change for carbon crediting under this determination is based on carbon stock change across the whole project area. Section 46 provides that carbon abatement is not eligible for carbon credits unless it meets the hurdle requirement for a minimum reduction in the volume of wood extracted from the project area.

8 Projects to reduce timber harvesting by deferral of harvesting

(1) An offsets project to reduce timber harvesting is a project to reduce the total amount of timber harvesting by deferring timber harvesting and thereby extending the length of harvest rotations and reducing the volume of wood extracted from the project area over a given period.

(2) An offsets project to reduce timber harvesting may relate to reducing timber harvesting across the whole of the project area or only in one or more parts of the project area.

Carbon Credits (Carbon Farming Initiative— Improved Forest Management in Multi-use Public Native Forest) Methodology Determination 2025 6

(3) An offsets project may comprise both a project to stop timber harvesting in one or more carbon protection areas and a project to reduce timber harvesting in other parts of the project area.

Comment.

As outlined in this submission, important science by Venn, Raison and many others has been ignored, supporting forestry. Your organisation appears to have very limited understanding of tree growth rates as trees get older and other concerns raised in this submission.

This is outrageous bureaucracy being used to close forestry to get some supposed benefits.

If you had any understanding of forestry and bushfire science, the results of this method/ scheme would be obvious, more and more repeat bushfires, mega fires, shorter forests and loss of obligate tree species.

and:

Consultation question

Question: Is the mandatory minimum project area size for non-RFA regions (1.5 million hectares) set at an appropriate level?

The intent in setting a minimum project area size is to mitigate additionality and leakage risks by ensuring project areas cover substantial areas of public native forests, where there can be confidence in baseline harvesting levels and there is limited scope for activity shifting. Generally, the smaller the project area the greater the additionality and direct leakage risks. However, if the minimum project area size is set too high, it could exclude valid projects.

Feedback is sought on whether 1.5 million hectares strikes the right balance.

Comment.

This is outrageous unproven bureaucracy at work that hasn't considered one piece of forestry science.

and:

forest management includes prescribed burns and emergency back-burning or mechanical clearing for firebreaks to prevent the spread of a wildfire.

Comment. I saw nil references to bushfire in this report, standard reference used in Australia

Explanatory Statement document

Carbon Credits (Carbon Farming Initiative) Act 2011

Carbon Credits (Carbon Farming Initiative— Improved Forest Management in Multi-use Public Native Forest) Methodology Determination 2025

Executive Summary

In public native forests where commercial harvesting may occur, stopping or reducing harvesting will result in improved greenhouse gas emission outcomes compared to the continuation of existing harvesting practices.

This Determination provides for the registration of 'improved native forest management' projects under the *Carbon Credits (Carbon Farming Initiative) Act 2011* (CFI Act) that generate greenhouse gas abatement by stopping or reducing harvesting in multiple-use public native forests (INFM projects).

Registered INFM projects can generate Australian carbon credit units (ACCUs), which are able to be sold to entities that want to, or are required to, offset their emissions. The ability to generate and sell ACCUs incentivises INFM projects.

The provisions of the Determination ensure the abatement that is credited in INFM projects is **real and additional**, and that it can be used to help meet Australia's international climate change mitigation obligations. The Determination also ensures that credited sequestration must be maintained for at least 100 years.

Under the Determination, INFM projects can involve:

- stopping harvesting in a defined area ('carbon protection area'); and/or
- reducing harvesting across the project area.

The project area for an INFM project must consist of all public native forests designated for commercial forestry use in at least one whole forestry region, defined as a Regional Forest Agreement (RFA) region or, in areas not covered by an RFA, an equivalent region of not less than 1.5 million hectares.

Comment.

"In public native forests where commercial harvesting may occur, stopping or reducing harvesting will result in improved greenhouse gas emission outcomes compared to the continuation of existing harvesting practices".

This is just one sided bureaucracy at work against the forestry sector.

Australia is going to become the laughing stock of the world.

Other

The author read an Australian Broadcasting Corporation (2025) article by Fiona Willan in relation to a carbon scheme to protect trees from logging.

<https://www.abc.net.au/news/2025-04-25/protect-trees-native-forest-logging-nsw-ken-henry-carbon-scheme/105207512>

It is understood that this would see state forests added to the nation's existing carbon credit scheme and the proposal is one of four chosen for priority development by the federal government and the state government agencies that manage the forests could then earn carbon credits by slowing or stopping logging. Industrial polluters could then buy those credits to offset their emissions as the nation moves towards its goal of reaching net zero by 2050.

The proposal has been criticised by the timber industry and the federal opposition.

2 The science supporting native forestry and carbon capture is totally ignored in setting up a scheme to close forestry

Sustainable forestry practices, such as thinning and ecological burning , are critical in reducing the risk of catastrophic bushfires, which are exacerbated by climate change.

There is considerable science supporting the success of native forest harvesting in capturing carbon, this is outlined in detail in the review.

As noted in Australian Forest Products Association (2022):

<https://ausfpa.com.au/sustainable-forestry-is-part-of-the-solution-to-australias-environmental-crisis/>

Ross Hampton also urged decision makers to heed the advice of the Intergovernmental Panel on Climate Change (IPCC), which says sustainably managing our native forests for timber delivers the best climate change mitigation results:

A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.” – IPCC 4th Assessment

The importance of forestry is further highlighted in an Opinion Piece by Forestry Australia (2022):

<https://www.forestry.org.au/opinion-piece-forestry-has-vital-role-to-play-in-tackling-climate-change/>

- *This is because growing trees absorb carbon from the atmosphere. When the carbon being absorbed by young trees is more than the carbon emitted by harvesting, the forest becomes ‘carbon-negative’.*
- *In Tasmania, this effect has gone one step further, as the trees regrowing after harvesting are not just absorbing more carbon than is emitted from harvesting trees, but they are absorbing more carbon than the entire state emits. To put it simply, if past timber harvesting had never occurred and new trees regrown, Tasmania’s carbon-negative position would not have been achieved.*
- *However, in non-forest sectors of Tasmania, emissions have increased over the past 10 years. For now, these increased emissions are being offset by the growing trees in the forest sector. But, with a decline in timber harvesting, this offset will only provide a temporary respite – carbon absorption rates decline as forests age, meaning that unless there are heavy emission reductions in other sectors, Tasmania will struggle to maintain its carbon-negative position into the future.*
- *Forestry is the science and craft of creating, managing, conserving, using and caring for forests. It is an important tool for managing forest carbon and is one of the only sectors that can absorb more carbon than it emits. With young trees absorbing more carbon and old trees*

storing more carbon, a diverse multi-age managed forest provides a holistic solution to climate change.

- *It will also lead to greater reliance on imports and alternatives with high carbon footprints, such as concrete and steel, as local, sustainable forest products become less available*
- *Australia has a global responsibility to tackle climate change and forestry has a significant role to play in this response.*

A very important report prepared by Venn (2023) report for Qld but applies to N NSW, NSW and indeed the principles apply across Australia.

<https://espace.library.uq.edu.au/view/UQ:c83d7fe>

Key points from this paper (I have extracted the applicable text and, in some cases, have done this as dot points and bolded points to assist the reader), noting the similarities between N NSW forests and much of southern Queensland's forests:

Abstract

- *Under existing policy settings, increased land sparing in QLD has a high risk of unintended negative outcomes, including for international biodiversity conservation and carbon emissions.*
- *While land sparing can benefit species that require long undisturbed forest habitat, conservation of most native flora and fauna in QLD is not substantially affected or is enhanced by selection harvesting practices permitted in the state. Decades of poor government resourcing of conservation estate management and timber plantation expansion suggests increased land sparing will have negligible benefits for domestic biodiversity conservation and wood supply in the absence of a considerable and permanent reallocation of scarce resources.*
- ***In contrast, land sharing can provide greater long-term climate risk mitigation benefits, promote high biodiversity values through creation of heterogeneous landscape mosaics and leverage private sector resources for conservation activities. These complex ecological and economic trade-offs have been collated for the first time in an Australian context and justify further research to explore their quantification and accommodation within the land sharing–sparing framework to better inform forest policy-making.***

Venn (2023) also identified other important issues in relation to carbon materials:

- *increased production of substitute products with substantially higher levels of embedded carbon (e.g. steel, aluminium, plastic, brick, concrete, and carpet) (Sathre and O'Connor, 2010), and*
- *increased plantation and native forest timber imports that can drive forest degradation and rural land use change in developing and other producer countries*

Important work by Raison (2024) reviews the impacts of sustainable harvesting, non-harvest management and wildfire on net carbon emissions from Australian native forests:

Abstract

A review of the science on net carbon dioxide emissions from continued harvesting or cessation of harvesting in Australian native forests was undertaken. Policy implications are discussed. Accurately estimating the long-term carbon (C) balance for forest harvesting regimes requires the use of a full life-cycle analysis (LCA) framework that includes changes in forest C stocks; the transport and processing of wood products; changes in C stocks in wood products in use and in landfill; and emissions avoided by using wood residues to replace fossil energy or by substituting wood products for more emissions-intensive construction materials. Assessing net changes in native forest C stocks requires consideration of patterns of C accumulation in biomass as forests age; forest C carrying capacity; C dynamics in soils; and the effects of wildfire on C stocks and dynamics.

One Australian study has adopted a complete and accurate LCA approach. That study concluded that the harvesting of sustainably managed native forests and the subsequent use of forest biomass to

produce harvested wood products or energy can make a positive contribution to mitigating national net C emissions. Other studies have overestimated the possible benefits of ceasing harvesting because they have either been incomplete, used inappropriate parameters to estimate components of the total C balance, or overestimated the rate of C gain in older forests and the ability of unharvested forests to store C for the long term. This has led to the incorrect conclusion that cessation of harvesting would provide lower long-term C emissions than sustainable management for wood production. A case study using C balance of Victorian 1939 regrowth mountain ash forest managed for sawlog and pulpwood production on a rotation of 75 years showed that Victorian Government statements that harvesting results in significantly increased C emissions are incorrect. Therefore, closing Victoria's native forest timber industry will have negative outcomes in terms of C emissions and climate.

The management of C in native forests needs to be integrated at the landscape scale with management for other forest values and attributes. Changes to C stocks in Australian native forests are driven much more by extensive wildfire than by harvesting. Harvesting affects only a small proportion of the forested landscape, and the C in annual log harvests equates to only about 0.6% of Australia's total net anthropogenic greenhouse-gas (GHG) emissions. Adding emissions of C from the decomposition or combustion of slash produced during harvest increases this figure to 0.8%. These C removals from the forest are offset by sequestration of C in new regrowth and are supplemented by benefits derived from the use of harvested wood. In contrast, in very bad fire seasons such as the 'Black Summer' of 2019/20, C emissions were about twice Australia's total annual anthropogenic GHG emissions and about 200 times greater than C removals in wood plus emissions from logging slash. When examined at the landscape scale, there is no evidence that harvesting leads to increased area burnt, fire severity or C emissions caused by wildfires. However, future wildfires in the large and contiguous areas of thick regrowth created after Black Summer poses a major threat to C stocks in all forests in the coming decades. Timber harvesting, providing it is well conducted in carefully selected parts of the landscape, can provide sustainable ongoing C benefits. A similar conclusion has been reached in numerous international studies.

Conclusions by Raison (2024) include (some of the conclusions teased out as dot points):

- The scientific evidence does not support the contention that management of Australia's native forests under a no-harvest regime would result in greater C mitigation benefits than management for timber harvesting. This conclusion is consistent with the international position.
- The false contention that cessation of harvesting in native forests provides better C outcomes than sustainable harvesting is a good example – it has lingered for too long and has had important negative policy outcomes.
- The management of C in native forests can be integrated at the landscape scale with management for other forest values and to meet the socioeconomic needs of local and rural communities. **Management for C alone will provide distorted outcomes.** Management priorities will vary greatly in specific locations, and maximising C stocks will generally not be the only high priority. **Timber harvesting, provided it is well conducted, is a valid forest use in carefully selected parts of the landscape and can provide ongoing C mitigation benefits now and into the future.** As discussed earlier, a similar conclusion has been reached in numerous international studies.

Forestry Australia (2024) notes:

<https://arr.news/2024/10/31/carbon-methods-for-native-forests-must-be-nature-positive-forestry-australia/>

Forestry Australia has called on the Australian Government to ensure that new ACCU Scheme carbon methods developed for managing native forests are truly 'nature positive', of high integrity and robustness, and will support the long-term health and resilience of our native forests and communities.

"Forestry Australia submitted a strong carbon method proposal for consideration under the Proponent-Led Method Development Process for the ACCU Scheme," Dr Jackson said.

“The proposed method, Enhancing Native Forest Resilience, is focussed on improving the health and resilience of native forests and encouraging active, adaptive management of native forests across all land tenures to assist Australia in meeting its Paris Agreement targets.

“Our proposed method is also based on enabling broader participation in the carbon market, which could include State forest management agencies and national parks managers as well as community groups, not-for-profits, private native forest landowners, and First Peoples.

“Forestry Australia’s method is based on a growing body of published work that shows forests that are actively managed can have greater carbon sequestration and storage potential.

“The proposal encompasses restorative forestry practices and active forest management focused on improving habitat values, carbon stocks and resilience to droughts and wildfires.

Another important issue is the increased usage of carbon in the long distance transport importing of timber from overseas.

The science in Australia and across the world highlights the value of well managed native forest operations on capturing carbon.

In my opinion, what is usually missed in relation to native forestry and harvesting and carbon capture and offsetting science include a number of issues:

- **The science supporting the value of native forest harvesting in relation to carbon capture is ignored;**
- **The areas harvested each year are small;**
- **Growth of older trees slows down and in most cases decay increases, reducing carbon storage;**
- **Regrowth is progressive each year over the small areas allowed for native forestry, capturing carbon. If past harvesting hadn’t occurred, there would have been a lot more emissions;**
- **Adaptive and active management assists in addressing the carbon issue. Forest Corp are working on tackling eucalypt decline, due to the lack of mild fire across landscapes to improve forest health and optimise carbon capture;**
- **Considerable volumes of carbon are stored in harvested wood products. Including sawn timber, veneers, beams, flooring, poles, fencing etc etc;**
- **Considerable areas are retained in flora reserves and other areas;**
- **Forest access, fire trails and skilled forestry operators increase speed of bushfire attack in many situations, reducing loss of carbon from bushfires;**
- **Inevitable intense bushfires resulting from minimal prescribed burning and long fire interval policies kill large numbers of trees and markedly reduce the health of remaining trees for around 10 years plus, the carbon impacts are that high. This further reduces carbon storage, in most cases markedly. In relation to the disastrous impacts of the 2019/ 20 bushfires on carbon emissions, there are many papers in relation to this; and**
- **Transport distances and carbon usage is low with local production and large with imported timber.**

These are all important issues that are conveniently missed in green agendas.

It is essential that a green woke government and minister does not make the wrong/ unbalanced decision.

- 3 [Increased mega bushfire occurrences and intensity across SE Australia, including large areas of locked up conservation areas and adding further to these, and consequent huge carbon emissions](#)

I outline this broadly below.

As noted by Raison (2024), changes to C stocks in Australian native forests are driven much more by extensive wildfire than by harvesting.

Then the inevitable intense bushfires kill large numbers of trees and markedly reduce the health of remaining trees for around 10 years, the impacts are that high. This further reduces carbon storage. In relation to the disastrous impacts of the 2019/ 20 bushfires on carbon emissions, there are many papers in relation to this.

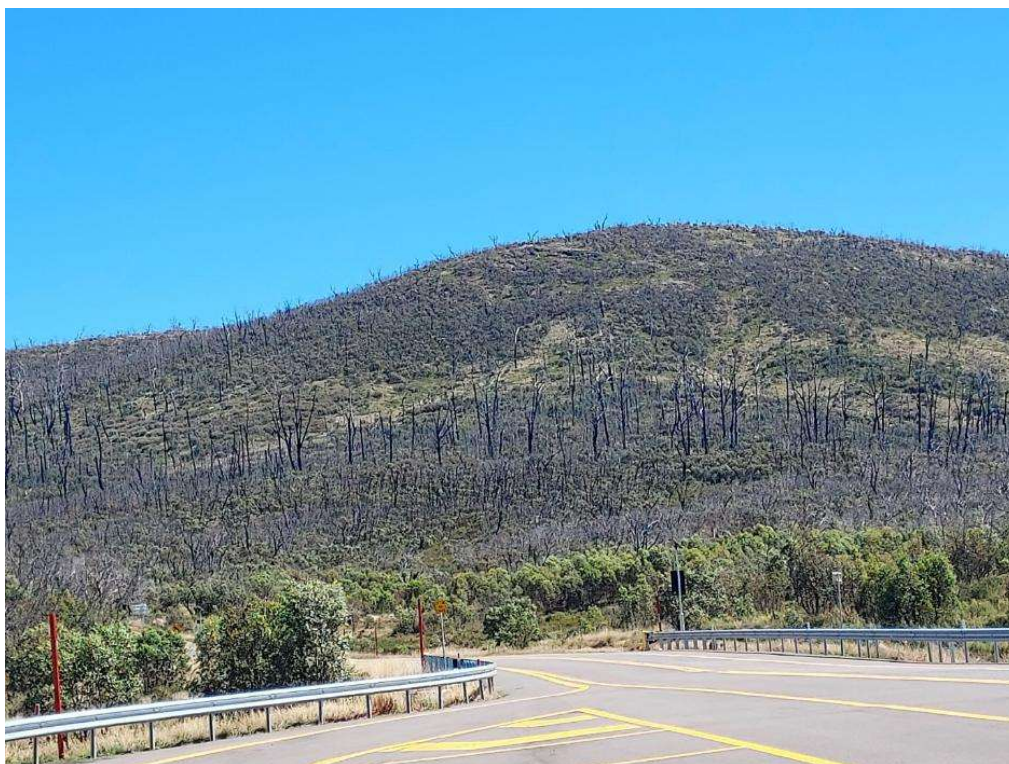
Refer to Gosper's Mountain bushfire and other bushfires in the Blue Mountains, the world's biggest ever individual bushfire in the world during 2019/ 20 bushfires. And the many other disastrous bushfires in the Greater Blue Mountains World Heritage Areas.

And then there are repeat huge megafires in Kosciuszko National Park (KNP). Refer to the following:

- https://www.fireandbiodiversity.org.au/images/publications/conference-2006/Fire_Management_in_the_alpine_region.pdf
- https://fridayoffcuts.com/dsp_article.cfm?id=1109&date={ts%20%272025-04-24%2000:00:00%27}&aid=14403 The NSW Alps 5 years after the 2019/2020 bushfires

As highlighted in my review, The NSW Alps 5 years after the 2019/2020 bushfires, it is readily apparent to anyone that the greenhouse impacts are huge and any scheme based on lock up would be highly dubious in effectiveness.

These bushfires are going to continue, unless prescribed burning rates in NSW increase from the minimal 0.6 % per year over the last 7 years, to around 8 % per year. The author cannot see this happening any time soon.



Kiandra to Adaminaby, a stark scene resulting from the 2019/ 20 bushfires in KNP, the carbon loss was obviously huge from tree mortality and lost growth. Dense understorey fuels with dead timber fuels represent a major fire hazard for the next bushfire. Fuel will now contain a high proportion of woody material and for many years subsequent bushfires will have a longer burnout period and be more damaging to any regenerating trees. Note the absence of live hollow bearing trees.



Cabramurra to Khancoban, above Tumut Pond Dam view resulting from the 2019/ 20 bushfires in KNP, the carbon loss was obviously huge from tree mortality and lost growth. Dense understorey fuels and dead timber fuels represent a major current and ongoing fire hazard for the next bushfire. Fuel will now contain a high proportion of woody material and for many years subsequent bushfires will have a longer burnout period and be more damaging to the regenerating trees. Note the absence of live hollow bearing trees.



Cabramurra to Khancoban. Large areas of single age 5-year-old snow gums (technically older where there are live lignotubers present below the ground) resulting from the 2019/ 20 bushfires in KNP, the carbon loss was obviously huge from tree mortality and lost growth. Fuel will now contain a high proportion of woody material and for many years subsequent bushfires will have a longer burnout period and be more damaging to the regenerating trees.

And the 2020 KNP bushfires were across large landscapes, the carbon emissions and were and still are huge, considering ongoing lost capture.

And there's more large bushfires in conservation areas:

- There are repeat megafires in the Grampians NP, these were huge in 2024 and 2025.
- There are repeat megafires in the Little Desert conservation area, these were huge in 2024 and 2025.
- The same applies to the Flinders Ranges.

Basically, conservation areas receive minimal low intensity bushfires and pay back time soon comes around with repeat megafires, generating huge greenhouse gas emissions.

It is perverse that low intensity fire is used as a carbon credit in N Australia when prescribed burning is used, yet in southern Australia credits could be claimed for lock up, involving no adaptive management and miniscule prescribed burning, currently around 3,000 hectares per year over 800,000 hectares in KNP.

I see there is a Consultation Question.

Consultation question

Question: Should years affected by major wildfire events be excluded from the baseline period when calculating the PNF leakage baseline harvest level and, if so, how should this be done robustly given data limitations?

Comment.

Basically, I am over the bureaucracy and anti-forestry approaches at any cost. My comments and concerns above provide input.

4 Failures of lock up management and policies across SE Australia and consequent carbon impacts

What really concerns me in all this is if lands reverted to a lock up land management approach, in a very short time the inevitable eucalypt decline will get worse, dense understories will get worse and intense mega bushfires will decimate even larger areas.

The forest health declines result in a considerable loss of carbon storage.

Lock up management just does not work, adaptive management does and it is totally unclear to me why NSW would consider phasing out timber harvesting/ thinning, including dense, high fuel load areas.

Attempt to stop native forestry for climate change credits is not the answer, and ignores key the facts and science.

Now, in NSW climate change issues appear to have a higher importance than bushfire issues, including fuel load, fuel strata, understory density, adaptive management and skilled forestry resources. And we can do something about fuel management in this country.

An example of this is in the Australian Alps Ministerial Council –Terms of Reference there is no reference to fire at all. To me, it is staggering that there is no reference to bushfires or fire management in the TOR. However, there is reference to climate change (4 refs). This further highlights the failures in NSW, ignoring critical issues such as fire management and bushfires.

And fire management, bushfires, megafires, poor fire regimes and carbon capture are critically linked.

In the two Australian Alps Ministerial Council meetings of 10 November 2023 and 21 June 2024, again there is no reference of bushfires or fire management at all. Bushfires are surely the biggest risk to the alpine parks and surrounding communities. However, there is reference to horses (3 and 6 refs in the meeting minutes) and climate change (3 and 1 refs in the meeting minutes).

The 2003 bushfires burnt an estimated area of 1.73 M hectares of the Australian alps. The 2019/ 20 bushfires again burnt huge areas of the alps, much at high intensity and severity noting massive fuel loads over contiguous areas. Earlier bushfires also burnt large areas of the alps.

Prescribed burning is at very low areas of forested lands, 0.6 % of forested lands in NSW per year, inadequate to reduce bushfire risks. Expanded prescribed burning is required to reduce risks to alpine ecosystems, people and surrounding communities.

And then there are excessive return low intensity fire intervals, massive fuel loads in our forests, increasing eucalypt decline due to lack of low intensity fire, increasing dense understory regeneration from intense bushfires over whole landscapes and human incompetence at addressing these issues.

These fire intervals have massive impacts on increasing intense megafires, decreasing forest health and resilience and reduced carbon capture.

Please refer above to images in KNP, one of the largest conservation areas in Australia that highlights

So Australia doesn't get the benefits of forestry and then you get monstrous greenhouse emissions under this proposed method. Frankly, it is outrageous that this method has been put on a shortlist.

5 Loss of adaptive management opportunities to optimise carbon capture

I glanced through the article and proposed method, other information at hand, and noted important issues that were not and apparently are not being considered, especially considering the potential

scale of proposed reduced timber harvesting, important forestry and carbon science areas not assessed, loss of active and adaptive management, minimal rates of prescribed burning underway in SE Australia, increasing eucalypt decline, large contiguous fuel loads across landscapes, mega fire concerns, loss of forest fire fighter expertise and the fact that conservation lockup isn't protection from decline nor bushfires.

The US is well onto reducing bushfire risks, increasing forest fire resilience, reducing carbon emissions and tackling community safety under their US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation and policies.

Here in Australia, much of the focus appears to be focussed on destroying native forestry and it is the authors belief is that Australia is currently paying and will pay the price for this.

6 Loss of forestry firefighting resources for effective firefighting and suppression and bigger bushfires and carbon emissions

As noted by Jurskis et al. (2006):

https://www.fireandbiodiversity.org.au/images/publications/conference-2006/Fire_Management_in_the_alpine_region.pdf

After the 2003 fires, a post script to the ISC report explained that the multiple lightning ignitions, which eventually culminated in Canberra's disaster, were unexpected. In fact multiple lightning ignitions during severe fire seasons have occurred repeatedly in the past, but have not had such severe consequences as in 2003. Multiple lightning strikes in State Forests and private lands to the west of the park at the same time caused little damage, and were all controlled within three days.

With less or no timber sales and native forestry, there will be limited forestry skills available as demonstrated in 2003.

Because the prescribed burning rates are so low in SE Australia, the bush is becoming more dangerous for firefighters and communities every year. And losing skills and expertise will make it worse.

7 No consideration of increasing eucalypt decline and associated carbon storage/ greenhouse impacts

Urgent action in relation to eucalypt decline is important and necessary for a number of reasons:

1. The increasing eucalypt decline across Australia and influence on forest structure, including increasing forest understories and changes in flora and fauna habitat;
2. As a result of changes in forests and understories, bushfire risks increase greatly, including intense bushfire risk;
3. Greenhouse gas emissions increase; and
4. Low intensity fire is available to start turning the process around, where it is not too late and understories are not too dense.

Regular low intensity fire and active/ adaptive management across landscapes is required urgently.

The US is well onto this issue under their US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation and policies.

And in Australia, a number are seeking to close adaptive management and also prescribed burning, further setting up even worse disaster scenarios and large greenhouse gas emissions from eucalypt decline and mega bushfires.

8 No consideration of important new climate science by Fasullo

A recent paper by Fasullo et al. (2023) highlights:

The climate response to biomass burning emissions from the 2019–2020 Australian wildfire season is estimated from two 30-member ensembles using CESM2: one of which incorporates observed wildfire

emissions and one that does not. In response to the fires, an increase in biomass aerosol burdens across the southern hemisphere is simulated through late 2019 and early 2020, accompanied by an enhancement of cloud albedo, particularly in the southeastern subtropical Pacific Ocean. In turn, the surface cools, the boundary layer dries, and the moist static energy of the low-level flow into the equatorial Pacific is reduced. In response, the intertropical convergence zone migrates northward and sea surface temperature in the Niño3.4 region cools, with coupled feedbacks amplifying the cooling. A subsequent multiyear ensemble mean cooling of the tropical Pacific is simulated through the end of 2021, suggesting an important contribution to the 2020–2022 strong La Niña events.

Put simply in relation to this research, I consider that a vicious cycle of bushfires and floods is underway:

- Major bushfires/ megafires occur with large greenhouse and other emissions occur, such as the 2019/ 20 bushfires
- Then Pacific cooling and consequent increased rainfall impacts in E Australia making La Nina's worse for Eastern Australia and increasing vegetation growth such as in 2020 to 2022.
- Consequent increased bushfire risks when an El Nino strikes such as in late 2023, with large areas of increased vegetation over Australia.
- The cycle continues.

This research needs to be considered and actioned, there are obvious solutions in markedly increased prescribed burning across south eastern Australia and an increased focus on adaptive management, reducing both bushfire insurance costs and flood costs and better protecting communities and the environment.

9 Ignoring dramatically increased and increasing insurance costs under the failed conservation fire intervals, ongoing forest lockouts and conservation lockups

This is obvious and well written about and happening up the eastern sea board, not further detail is needed. As a consequence, people are being frozen out of insurance and ongoing disasters are occurring and insurance costs are increasing rapidly.

More and more lockup and reduced adaptive management will make this worse, government is a huge part of the disaster problem.

10 Ignoring the poor biodiversity outcomes occurring under the failed conservation lockup approach, poor fire policies and regimes and repeat intense bushfires and poorly considered carbon approaches

Some references in relation to this matter highlight the extent of the concerns:

- Onfray R (2023) Proof that species are declining in our forests set up to protect them: Australian Rural & Regional News 6 May;
- SETA (2022) document "Eucalyptus imlayensis (Imlay Mallee) Fully Protected Since 1972 – 50 Years Drifting Towards Extinction" April; and
- SETA (2022) Doomed Flora and Fauna - Why Current Bushfire Mitigation Levels Must be Increased, SETA website.

Further lock up/ minimal harvesting is just going to add to the problems.

Forestry expertise is being decimate at the expense of green and government activism, lawfare and ignorance.

11 Political games underway to end or markedly reduce remaining native forestry and consequently increase carbon impacts

Onfray R (2025) notes:

<https://robertonfray.us7.list-manage.com/track/click?u=90c62c6b20945eede9c5c7b8f&id=987d96c068&e=f733648240>

Adding insult to injury, a body of highly effective not-for-profit environmental organisations is seeking to end all professionally managed forests based on the wise use of timber resources. The National Parks of NSW, the EPA NSW, the NSW Minister of the Environment, and the National Parks Association of NSW are also working toward the same goal—to end forestry in State Forests.

Bureaucrats within these departments have developed models to prove that the harvesting of native forests leads to more carbon emissions than sequestration. The real world disproves this. The North East NSW Forestry Hub, in association with the North Queensland Forestry Hub, South & Central Queensland Forestry Hub, and the South East Forestry Hub, working with University of Queensland researchers and an officer of the NSW Department of Primary Industry, are currently developing a project titled “Land Use, Land-use Change and Forestry.”

Thus far, their results show two significant findings. Within Australia, agriculture and forestry are the only carbon-negative (climate-positive) sectors. Forest clearing and forest regrowth produce a nil impact on carbon emissions, one balancing out the other. The findings also reveal forestry has better outcomes than locking up the forests and throwing away the keys.

Australia has about 131.5 million hectares of native forest, 1.82 million hectares of plantation estate and 440 million hectares of grassland. If we focus on forests alone, a single hectare absorbs 6.4 tonnes of CO₂ per year. Thus, 853.3 million tonnes is absorbed by Australia’s forests each year compared to emissions of 417 million tonnes a year.

Leaving forests in situ and not utilising its timber products is a worse outcome carbon wise. This is because carbon is stored longer in the finished timber product. Delaying harvest, or not harvesting and getting paid for the carbon is a short-term solution which may work until the tree dies.

Not surprisingly, the not-for-profit environmental organisations and green government agencies deny this research because it does not fit the “truth” they desperately seek.

The Climate Change Authority claims Australia needs to convert an area the size of Belgium into forest to achieve net zero emissions by 2050 and the forestry and agriculture needs to play it part in reaching zero emissions, despite already being the only land use sectors that positively sequester carbon. Forestry and agriculture do not need to do any heavy lifting and shouldn’t be the easy solution for other sector’s emissions through dodgy carbon offsetting.

Well said Robert Onfray.

It is doubtful if such an offset scheme would work with fully or reducing stopping native forest harvesting for a carbon market/ method approach. I suggest there would be very little likelihood of this, unless the numbers get cooked in bushfire smoke.

12 Other concerns in relation to the proposed carbon method

Other concerns in relation to closing harvesting operations include:

- Loss of regional industries and employment under such a stop/ reduce harvesting proposal;
- Potential loss of access and fire trails, many of these get closed down under lock up management;
- Sovereign risks, importing even more timber and the long distance transport carbon impacts of that; and
- Biosecurity risks with increased imports.

Oh yes, I remember, regional people and businesses don’t count for much these days.

13 Opportunities to realise carbon and biodiversity benefits using native forestry science and adaptive management

The author highlights five opportunities to realise carbon and biodiversity benefits using native forestry science and adaptive management.

Opportunity 1. Ensure that native forestry harvesting and adaptive management retains a vital role to play in tackling climate change and biodiversity/ adaptive management, this opportunity area is expanded across SE Australia and that native forestry is supported

Forestry management in NSW is aligned with ecological sustainability, contributing to carbon sequestration and biodiversity protection.

The role of forests and wood products in mitigating climate change through carbon markets is recognized.

The expansion of native forestry harvesting and adaptive management retains must continue to play a role in tackling climate change and biodiversity/ adaptive management, this opportunity area is expanded across SE Australia and that native forestry is supported. Removal of locked up conservation land back to native forestry needs to be considered.

Opportunity 2. Ensure active and adaptive management applies to SE Australian forests as used across US forests under US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation

A valuable article is attached in the link.

<https://arr.news/2022/01/25/opportunities-for-improved-fire-management-in-australia-john-odonnell/>

There is no such bill or similar bills across Australia in regards to the US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation. There is no effective, integrated nor broad federal/ state commitments in regards to what the US has committed to, reducing fuels, increasing prescribed burning, improving forest health and expanding community wildfire mitigation work.

There is an opportunity there for NSW to lead the way.

Opportunity 3. Address opportunities raised in the Venn report in relation to carbon and biodiversity benefits provided by forestry

A very important report prepared by Venn (2023) report for Qld but applies to N NSW, NSW and indeed the principles apply across Australia. This paper is titled "Reconciling timber harvesting, biodiversity conservation and carbon sequestration in Queensland, Australia" by Tyron Venn. This work was partly supported by Forest and Wood Products Australia, project number PNC379-1516, entitled "Improving productivity of the private native forest resource in southern Queensland and northern New South Wales".

Venn (2023) notes:

land sharing can provide greater long-term climate risk mitigation benefits, promote high biodiversity values through creation of heterogeneous landscape mosaics and leverage private sector resources for conservation activities

The author considers that land sharing needs to be optimised and land sparing reduced

Opportunity 4: Reduce intense bushfires, carbon emissions and risks to SE Australian forests

As noted by Raison (2024), changes to C stocks in Australian native forests are driven much more by extensive wildfire than by harvesting.

There is a big opportunity to realise carbon and biodiversity benefits and support carbon and biodiversity by reducing intense bushfires as outlined in the sections above. Quite simply, intense bushfires are mostly related to crazily excessive return low intensity fire intervals, massive fuel loads in our forests, increasing eucalypt decline due to lack of low intensity fire, increasing dense

understorey regeneration from intense bushfires over whole landscapes and human incompetence at addressing these issues.

The result is a mass of dead trees and declining tree growth that will continue for over 10 years plus. Plus, there is a fire cycle of death of return intense bushfires.

This can simply be remedied by regular prescribed and maintenance burning every 3 to 6 years.

Why not consider a carbon offset scheme across SE Australia based on prescribed burning rates across landscapes/ states of around 8 % of forests per year to reduce greenhouse impacts of megafires and failed fire regimes? This question doesn't seem to get asked, the focus appears to be on stopping native forestry harvesting, which is a massive part of the solution.

Opportunity 5. Address the ongoing failures of conservation management across SE Australia in relation to bushfires, carbon and biodiversity and most importantly policies

What really concerns me in all this is if lands reverted to a lock up land management approach, in a very short time the inevitable eucalypt decline will get worse, dense understories. The forest health declines result in a considerable loss of carbon storage.

Then the inevitable intense bushfires kill large numbers of trees and markedly reduce the health of remaining trees for around 10 years, the impacts are that high. This further reduces carbon storage. In relation to the disastrous impacts of the 2019/ 20 bushfires on carbon emissions, there are many papers in relation to this. Refer to Gosper's Mountain, the biggest ever individual bushfire in the world.

And then there are repeat huge megafires in Kosciuszko National Park. Refer to the following:

- https://www.fireandbiodiversity.org.au/images/publications/conference-2006/Fire_Management_in_the_alpine_region.pdf
- https://fridayoffcuts.com/dsp_article.cfm?id=1109&date={ts%20%272025-04-24%2000:00:00%27}&aid=14403

There is an urgent need to remove minimal prescribed burning and long fire interval policies which result in large numbers of dead trees across landscapes and markedly reduce the health of remaining trees for around 10 years plus, the carbon impacts of these policies are very high.

14 Conclusions

Important concerns in relation to the push to stop or reduce native forestry logging under an expanded carbon credit scheme are outlined in this submission. 12 concerns are outlined and they are all important, questioning the value of such a proposal to stop or reduce native forest harvesting.

Attempting to stop native forestry for so called imaginary climate change credits/ method is not the answer, seriously, again ignoring many key factors and science.

I do not understand how this method was shortlisted considering the information this submission has provided.

Lock up management does not work, adaptive management does, and it is totally unclear to the author why Australia and some governments would consider closing or reducing native timber harvesting/ thinning, including within dense, high fuel load areas and areas suffering from eucalypt decline, to attempt to gain carbon offsets.

Seriously, this proposed method should be withdrawn.

It would be opportune for NSW to consider a carbon method based on closing conservation areas and bringing in prescribed burning and adaptive management, like the US understands.

Why not consider a carbon offset scheme across SE Australia based on increasing prescribed burning rates across landscapes/ states of around 8 % of forests per year to reduce greenhouse impacts of megafires and failed fire regimes? This question doesn't seem to get asked, the focus appears to be on stopping native forestry harvesting, which is a massive part of the solution.

It is important that Forestry Australia has submitted an alternative carbon method proposal for consideration under the Proponent-Led Method Development Process for the ACCU Scheme called Enhancing Native Forest Resilience. This focusses on improving the health and resilience of native forests and encouraging active, adaptive management of native forests across all land tenures to assist Australia in meeting its Paris Agreement targets, all important issues.

The US bipartisan infrastructure bill, US National Cohesive Wildland Fire Management Strategy and other legislation provide an effective approach to reducing fuels, increasing prescribed burning, improving forest health and forest resilience and expanding community wildfire mitigation work, reducing the extent and impacts of wildfires and consequent carbon emissions. This provides a model for Australia, a practical approach and not an offsets scheme.

Opportunities to realise carbon and biodiversity benefits using native forestry science and adaptive management are outlined in Section 13.

Steadily and surely Australia is undertaking extreme regulatory creep, poor policy and endless bureaucracy. Current environment outcomes are disastrous since progressive closure of forestry, and it is going to get much worse. The US gets it, this country doesn't.

References

Australian Broadcasting Corporation Willan F (2025) Former treasury boss looking past logging to expanded carbon credit scheme ABC News Friday 25 April 2025

<https://www.abc.net.au/news/2025-04-25/protect-trees-native-forest-logging-nsw-ken-henry-carbon-scheme/105207512>

Fasullo JT, Rosenbloom N and Buchholz R (2023) A multiyear tropical Pacific cooling response to recent Australian wildfires in CESM2 SCIENCE ADVANCES 10 May 2023 Vol 9, Issue 19 DOI: 10.1126/sciadv.adg121 highlights:

Forestry Australia Michelle Freeman (2022) Opinion Piece: Forestry has vital role to play in tackling climate change.

Forestry Australia (2024) Carbon methods for native forests must be 'nature positive 30 October 2024 Media Release <https://arr.news/2024/10/31/carbon-methods-for-native-forests-must-be-nature-positive-forestry-australia/>

Forest Products Association (2022) Sustainable forestry is part of the solution to Australia's e

Jurskis V, de Mar P and Aitchison B (2006): Fire Management in the Alpine Region. Bushfire Conference Brisbane 6-9 June 2006

https://www.fireandbiodiversity.org.au/images/publications/conference-2006/Fire_Management_in_the_alpine_region.pdf

Onfray R (2023) Proof that species are declining in our forests set up to protect them: Australian Rural & Regional News 6 May.

Onfray R (2025) The great carbon credit con: A shonky system exposed 7 February 2025

<https://robertonfray.us7.list-manage.com/track/click?u=90c62c6b20945eede9c5c7b8f&id=987d96c068&e=f733648240>

Raison RJ (2024) A review of the impacts of sustainable harvesting, non-harvest management and wildfire on net carbon emissions from Australian native forests Australian Forestry 2024, VOL. 87, NO. 4, 176–194 <https://doi.org/10.1080/00049158.2024.2433815> © 2024

SETA (2022) document "Eucalyptus imlayensis (Imlay Mallee) Fully Protected Since 1972 – 50 Years Drifting Towards Extinction" April.

SETA (2022) Doomed Flora and Fauna - Why Current Bushfire Mitigation Levels Must be Increased, SETA website.

Venn T (2023) Reconciling timber harvesting, biodiversity conservation and carbon sequestration in Queensland, Australia. This work was partly supported by Forest and Wood Products Australia, project number PNC379-1516, entitled "Improving productivity of the private native forest resource in southern Queensland and northern New South Wales". <https://espace.library.uq.edu.au/view/UQ:c83d7fe>