



**AUSTRALIAN
CONSERVATION
FOUNDATION**



The Hon. Anthony Albanese
Prime Minister of Australia
PARLIAMENT HOUSE
CANBERRA ACT 2601

Cc: The Hon. Murray Watt, Minister for the Environment and Water

27th February 2026

Re: EPBC Reform, National Forest Policy and the Timber Fibre Strategy

Dear Prime Minister,

We are writing to raise the most serious concern about the development of Commonwealth Government forest policy. Our nation is evidently facing unprecedented crises of biodiversity loss and climate change. The decline of native species cannot be arrested nor climate change abatement measures succeed without the protection and restoration of our native forests ([Biodiversity Council 2024](#)).

We welcomed the announcement that the Government would remove the previous exemption of logging in Regional Forest Agreement (RFA) regions from environmental laws and standards. We were alarmed and dismayed however, when the Government also announced that it would guarantee the future of native forest logging by adopting the Australian Timber Fibre Strategy (TFS) ([Press conference 27 November 2025](#), [Doorstop 1 December 2025](#), [Media Release 27 November 2025](#)).

The government supported and funded the TFS ostensibly as an input to a revised National Forest Policy (NFP). It was prepared by the Strategic Forest and Renewable Materials Partnership, an industry forum advising the Minister for Agriculture, Fisheries and Forestry.

There is no similar body providing advice from forest ecologists or conservation experts. Indeed, the TFS proposes measures that would pre-empt any meaningful revision of the NFP and frustrate the establishment of new federal environmental standards.

The TFS does not propose a useful strategy to support an internationally competitive and climate resilient plantation-based timber industry. Nor does it prevent conversion of native forests to

plantations. It is focussed instead on exceptionally damaging measures to extend the life of the declining low value native forest sector, which is acknowledged to provide less than 10% of present supply.

It is ignorant of the increasing risk of damage to critical forest ecosystem services such as the provision of clean water, tourism, long-term carbon storage and climate change abatement.

For instance, it proposes the creation of nation-wide permanent rights to log expanded 'working forests'. It supports wide-scale thinning of native forests across all tenures funded through carbon credits and the removal of barriers to the use of native forest timber for the generation of bioenergy.

Disconcertingly, this proposal appears to support logging in National Parks.

The assumption that native forests can continue to be plundered for timber and fibre (essentially for woodchips and bioenergy) and somehow store and sequester carbon at the same time is demonstrably absurd. It bears no relation to biological reality. There are no better examples of this failed approach than the Finnish and Canadian forests, once large carbon sinks, which have now become sources of carbon pollution driven by over extraction and wildfires. The 2019/20 fires in Australia provided a taste of the phenomenon.

Labor in government first excluded native forest biomass from eligibility as renewable energy source in 2011, so electricity it generates cannot be used to create tradeable Large-scale Generation Certificates (LGCs). At that time, government explained it was "*to ensure that the RET did not provide an incentive for the burning of native forest wood waste for bioenergy, which could lead to unintended outcomes for biodiversity and the destruction of intact carbon stores.*" The policy was revoked by the subsequent Liberal – National Coalition Government in 2015 but reinstated by Labor in December 2022 on its return to government. It must be maintained.

A national forest policy that has not been developed through negotiations and support of the community environment sector will not succeed. As it stands, the TFS will not assist the Australian Government to implement its commitment at COP28, Dubai, to end forest degradation by 2030.

Rather than a fibre strategy exclusively addressing timber, a construction fibre strategy that also includes emerging industrial hemp and bamboo sectors is required. Such a strategy would contribute to your government's Future Made in Australia agenda, support the transition to innovative emerging fibre sectors, reduce Australia's \$4Bn-and-growing trade deficit in timber, and create jobs in regional areas.

The proposal of the TFS to expand biomass burning for energy generation is self-evidently destructive. This process – whereby forest carbon is moved directly from the stump to the atmosphere – inevitably destroys forests as trees are logged and then produces more greenhouse gas at the chimney stack than burning coal. A number of studies confirm these perverse consequences ([Griffith University 2022](#)).

A detailed analysis of the TFS and its grave failures is provided in [this document](#). In summary:

1. The TFS ignores its own TOR, which excludes land use allocation issues.
2. No attempt was made to reach out to relevant stakeholders or scientists outside the forestry profession for an assessment of the ecological viability of the key elements of the Strategy. In reality, new forest assessment and monitoring tools reveal deep problems arising from past and current forest management. The best available information concerning the importance of biodiversity, the relevance of forest age for fire management and the risks to forest carbon stocks are ignored, or worse dismissed by the TFS.
3. The TFS completely misunderstands and misrepresents the role of communities and forest conservation initiatives in the maintenance of standards and governance in public native forests. In reality, sophisticated and scientifically robust citizen science has revealed profound regulatory failure to protect state and federally listed species ([Wilderness Australia 2026](#), [Wilderness Australia 2023](#), [Forest Alliance NSW 2024](#), [Bob Brown Foundation 2022-2025](#), [Bob Brown Foundation 2024](#); [The Wilderness Society \(reports\) 2023-25](#); [The Wilderness Society \(survey data\) 2023-2025](#)).
4. The TFS acknowledges that 91% of Australia's timber is currently supplied by plantations but then focuses almost all of its attention on sustaining otherwise uneconomic native forest logging.
5. The TFS pays no heed to the full depth of knowledge about the state of Australia's native forests. It focuses narrowly on the exposition of a conceptual proposition called 'active management,' the scientific basis for which is either missing or strongly contestable. It simply ignores the robust body of scientific evidence demonstrating the adverse impact of logging on the health of forest ecosystems and their ability to both resist and adapt to threats that are increasing with climate change.
6. The TFS is egregiously rent seeking. It asks for more support for plantation expansion and research despite the fact that existing research funding of over \$100 million is still largely unspent. Notwithstanding the existence of large stockpiles of house framing timber and increasing uptake of non-timber framing and building materials, the TFS contends that there is a need for much more timber to support the expansion of the housing sector.
7. The TFS fails to provide a realistic strategy to expand plantations that are conversion-free, certified to the highest standards (i.e., FSC), excludes harvesting of remnant and regrowth native vegetation that support populations of threatened wildlife and high conservation values, mitigate risks (e.g., bushfires, hydrology, insurability, invasive species) and secure social licence.

Much has changed since the NFP of 1992. The TFS neither recognizes nor considers any of the science-based imperatives or new information tools that should guide industry strategy and improve conservation management in the present day. Science-based approaches now emphasize the importance of retaining and recovering forest ecosystem integrity, its intact natural biodiversity.

In practice this means that areas of high ecological integrity and core habitat for listed species must be retained. Ecological connectivity to enable species to move across landscapes and adapt to climate change should be preserved. Refuges that will enable the survival of wildlife during extreme events should be identified and protected. New environmental standards must ensure these outcomes are achieved on the ground.

New knowledge emphasizes the importance of concurrent climate and biodiversity action to protect and restore the stability and resilience of forest ecosystems ([Young et al \(CBD\) 2025](#); [Young et al \(UNFCCC\) 2025](#)).

The science used to underpin the Regional Forest Agreements 20 years ago must be updated to reflect the present state of the forests. This is particularly important given the damage to forest ecosystem integrity, wildlife populations, habitat and ecological connectivity evident from the 2019/20 fires ([Austeco 2020](#)).

We do not dispute the need for a strong and resilient timber industry. However, it cannot be achieved without a clear social license. This is not a PR exercise. Social license can only be achieved if native forest logging and conversion of native forests to plantations cease. National forest policy should ensure a safer and more resilient future for our native forests and wildlife and for communities that live in or near them.

Instead of trying to prop up the declining native forest logging industry, government policy should focus on improving plantations, agro forestry and regenerative forestry, on improving and expanding wood processing opportunities, driving investment and production in prefabricated manufactured housing, and fostering protection and restoration activities in native forests.

We look forward to the opportunity to discuss these issues with the Government and at least to receive the level of recognition our sector received during past forest policy processes. A revised NFP must be framed by ecological principles and respect up-to-date science, on-ground understanding and First Nations' knowledge.

Sincerely,



Virginia Young
Director, Wilderness Australia

Signed on behalf of:



Bob Brown Foundation



National Parks Association NSW



Nature Conservation Council



Queensland Conservation Council



North East Forest Alliance



WA Forest Alliance



Independently organised ACF group
ACF Community Boroondara



Independently organised ACF group
ACF Community Eastern Rosellas



Independently organised ACF group
ACF Community Eastern Sydney



Independently organised ACF group
ACF Community Forest Alliance Victoria



Independently organised ACF group
ACF Community Greater Western Sydney



Independently organised ACF group
ACF Community Melbourne NxNW



Victorian Forest Alliance



South East Forest Rescue



Independently organised ACF group
ACF Community Canberra



Friends of Leadbeater's Possum



NORTH COAST ENVIRONMENT COUNCIL INC.
North Coast Environment Council



Friends of the Forest (Mogo)



Lawyers for Forests



Wildlife Carers for Protection of Habitat



Kinglake Friends of the Forest



Kyogle Environment Group



Sunshine Coast Environment Council



Blicks River Guardians

GREEN SHAREHOLDERS



Green Shareholders

South East Region Conservation Alliance



Gippsland Community Fire Watch



Warburton Environment



Nambucca Valley Conservation Association



Lighter Footprints



Never Never Catchment Group



Environment East Gippsland



Australian Forests and Climate Alliance



Rainforest Information Centre



Tarkeeth Forest Wildlife Refuge



Bellingen Environment Centre



Peoples Climate Assembly



Friends of Bats and Habitat Gippsland



Canberra Forest Alliance



Friends of Tuckers Nob

Friends of Tuckers Nob



Friends of Kalang Headwaters



Friends of Orara

Friends of Orara



Friends of Scotchman

Friends of Scotchman



Friends of Coffs Coast Koalas

Friends of Coffs Coast Koalas



Friends of Conglomerate

Friends of Conglomerate



Friends of Dorrigo Koalas (FoDK)

Friends of Dorrigo Koalas



Friends of Tarkeeth Koalas

Friends of Tarkeeth Koalas



Kalang Land Environment Action Network