

November 2020

Tasmanian Climate Change Office
Department of Premier and Cabinet
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TFPA Submission: Climate Change (State Action) Amendment Act 2021

The Tasmanian Forest Products Association (TFPA) welcomes the opportunity to make comment to the Climate Change (State Action) Amendment Act 2021 noting that the changes posed are necessary. Importantly for TFPA is that we are continually consulted, especially during the design and implementation of the climate change action plan and sector plan.

Tasmania's forest industry is unique in many ways. It is based on a renewable resource that sequesters carbon. The industry employs over 5,000 direct and indirect jobs in rural and regional areas and in major cities.

The TFPA is the peak body for forestry that undertakes policy development, lobbying and advocacy for members interests. TFPA represents all elements of the value chain from the sustainable harvesting of plantations and multiple use natural forest resource including forest establishment and management, harvesting and haulage, processing of timber resources and manufacture of pulp, paper and bioproducts.

The TFPA supports the key amendment to the Act to legislate an emissions reduction target of net zero emissions from 2030.

Forestry is a well-established industry in Tasmania. Our forests act as a carbon sink and produce wood-based products that help achieve climate neutrality by storing carbon, which offsets most of the State's greenhouse gas emissions. Projected climate changes mean it will be important to sustainably manage our current natural forests and plantations to offset atmospheric greenhouse gases.

This is based on the State's fortunate position of being 100% self-sufficient in renewable electrical energy and our forests absorbing carbon dioxide from the atmosphere to offset our emissions.

Without the Land Use, Land Use Change and Forestry (LULUCF) sector Tasmania's emissions in 2019 were 8.36 Mt CO²-e. This demonstrates that LULUCF has been the primary influence on reducing emissions to a significant carbon sink.

The TFFPA agrees with the Government to not legislate sectoral targets, as industries and sectors need time, support and research to reduce emissions in the context of the global transition.

Tasmania's forestry plays a significant role in mitigating climate change, growing regional communities and providing economic benefit to the state, but we can do a lot more with support from the community to continue to grow, diversify and deliver carbon storage solutions.



- Tasmanian landmass: 6.81million hectares
- Forest area: 3.35 million ha (91% natural & 9% plantation)
- Public production forests: 812,000 ha (under 50% available for wood production)

Forestry will continue to play a major role in mitigating climate change, which is supported by the Intergovernmental Panel on Climate Change (IPCC), the United Nations body for assessing the science related to climate change.

The IPCC Fourth Assessment Report has stated; "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."

Furthermore, the IPCC said: "Sustainable forest management aimed at providing timber, fibre, biomass, non-timber resources and other ecosystem functions and services, can lower GHG emissions and can contribute to adaptation (high confidence).¹"

Sustainable forest management can enhance the carbon stock in biomass, dead organic matter, and soil – while providing wood-based products to reduce emissions in other sectors through material and energy substitution. A trade-off exists between different management strategies: higher harvest decreases the carbon in the forest biomass in the short term but increases the carbon in wood products and the potential for substitution effects. Sustainable forest management, also through close to-nature silvicultural techniques, can potentially offer many co-benefits in terms of climate change mitigation, adaptation, biodiversity conservation, microclimatic regulation, soil erosion protection, coastal area protection and water and flood regulation.²

¹ IPCC, 2019: Summary for Policymakers. In: Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems.

² IPCC 2019: Interlinkages Between Desertification, Land Degradation, Food Security and Greenhouse Gas Fluxes: Synergies, Trade-offs and Integrated Response Options. In: Climate Change and Land: an IPCC special report on climate change and land. **TFFPA represents forest growers, harvesters, and manufacturers of timber, wood and fibre products.**

Tasmania's well balanced and diversified sustainable forest industry will be critical going forward and will need to involve all sectors of forestry.

Plantation forest timber:

- The timber frames for our homes, engineered wood products used to build new multi-storey residential and commercial buildings, wood-based panels for our kitchens, and wood fibre used to manufacture newsprint, packaging and bioproducts, replacing single use plastics. In addition, residues go into making potting mix, mulches, composts and landscaped products for our gardens.

Native forest timber:

- Floorboards, staircases and furniture, while the residues and secondary timbers are used to make pallets, paper and packaging, replacing single use plastics. Also, local processing of timber products including ply, veneer and construction timber.

The use of wood products that store carbon for long periods, such as in building construction applications, can sequester carbon for longer. This has the additional benefit of replacing more emissions-intensive building products such as concrete and steel.

It is not just the IPCC that understands that the forest industry is an essential part to assist in moving to a modern, climate neutral, resource-efficient and competitive economy. Below details examples from other jurisdictions, including:

The European Union's Forestry 2030 Strategy³ includes measures for strengthening forest protection and restoration, enhancing sustainable forest management and improving the monitoring of forests. The EU strategy provides focus and assurance for the Tasmanian Government that multi-functional forests will continue to help in reducing greenhouse gas emissions.

The key points from the EU strategy we recommend to government:

- The EU acknowledges the need to support the socio-economic functions of forests for thriving rural areas and boosting forest-based bio-economies within sustainability boundaries.
- Sustainably produced and long-lived wood-based products can help achieve climate neutrality by storing carbon and substituting fossil-based materials.
- Harvested wood products in the EU represent an active net carbon sink of around -40 MtCO₂e/year, while also generating climate benefits through a material substitution effect in values ranging from -18 to -43 MtCO₂e/year.
- The most important role of wood products is to help turn the construction sector from a source of greenhouse gas emissions into a carbon sink.
- The Commission will develop a 2050 roadmap for reducing whole life-cycle carbon emissions in buildings.
- The Commission will develop a standard, robust and transparent methodology to quantify the climate benefits of wood construction products and other building materials.

change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems.

³ European Commission 2021. Communication from the Commission to the European Parliament, the Council, The European Economic and Social Committee and the Committee of the Regions. New EU Forest Strategy for 2030.

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From the recent United Nations Climate Change Conference in Glasgow there were a number of countries that made a Declaration on Forests and Land Use, which Australia was one. They emphasised the critical and interdependent roles of forests of all types, biodiversity and sustainable land use in enabling the world to meet its sustainable development goals; to help achieve a balance between anthropogenic greenhouse gas emissions and removal by sinks; to adapt to climate change; and to maintain other ecosystem services.

The signatories recognise that to meet our land use, climate, biodiversity and sustainable development goals, both globally and nationally, will require transformative action in the interconnected areas of sustainable production and consumption; infrastructure development; trade; finance and investment; and support for smallholders, Indigenous Peoples, and local communities, who depend on forests for their livelihoods and have a key role in their stewardship.

The TFPA looks forward working with the forestry minister in developing sector-based emissions reduction and resilience plans. We believe an amendment is needed under Section 5C, to include the provision that sector-based transition plans are disallowable instruments.

The purpose and benefit of having the sector-based transition plans as disallowable instruments is that it provides an extra level of scrutiny in having to go through both houses of Parliament, which gives each sector appropriate opportunity to advocate for any changes.

Current examples of disallowable instruments are:

- Forest Practices Act 1985
 - The Act provides the Board to prepare a code of conduct for forest practices officers
 - Section 40A sets out that the Board may issue a code of conduct if Minister has laid a copy before each House of Parliament – meaning it is disallowable.
- Nature Conservation Act 2002
 - This Act gives the Minister the power, by order, to amend the list of ‘threatened native vegetation communities.’
 - Section 76A provides that the order is to be treated as if it were regulations – meaning that the order is disallowable.
- COVID-19 Disease Emergency (Miscellaneous Provisions) Act 2020
 - This Act gives the Premier, the Treasurer and the Attorney-General to make declarations by public notice to adjust the operation of a range of statutory requirements in legislation.
 - Section 7 sets out a process whereby the notices are to be tabled in Parliament and specifies that notices are to be treated as regulations – meaning they are disallowable.

In conclusion, the future of Tasmanian forestry is key to the Tasmanian Governments target of net zero by 2030. Incorporating sustainable forest management and its products at the centre of the Government’s strategy will be critical to ensure that policies and plans are well designed and avoid any unintended consequences.

I look forward to further discussing the Government's climate change action plan and sectoral plan, as the process of design and implementation is undertaken.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Steel', with a horizontal line extending to the right.

Nick Steel
Chief Executive Officer