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Submission for the Emissions Trading Scheme (ETS) discussion paper

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FOR AN EMISSIONS TRADING SCHEME TO BE SUCCESSFUL ALL POLLUTING SECTORS OF THE AUSTRALIAN ECONOMY MUST BE HELD ACCOUNTABLE FOR THEIR EMISSIONS

This submission has been prepared by *Forests for Climate Inc.*

Recommendation: The forestry sector must be included in the Emissions Trading Scheme (ETS) as it is a sector that is contributing to greenhouse gas emissions. Failure to do so will call into question the legitimacy of the ETS.

In order to achieve an effective and equitable Emissions Trading Scheme (ETS), it is imperative that all sectors of the Australian economy are accountable for their greenhouse gas pollution. Currently, the forestry sector is not being held accountable for the emissions they are producing from current forest logging and burning practices.

Forests are the largest terrestrial carbon sink and are thus of vital importance to the mitigation of dangerous climate change. They play a very important role in the carbon cycle, whereby they remove carbon dioxide out of the atmosphere in a process called photosynthesis. Trees and shrubs use this carbon for their growth, locking up the carbon in their woody tissue. As these trees mature, they store more and more carbon, effectively removing large amounts of CO₂ from the atmosphere. Mature forests that have not been subject to anthropogenic disturbance such as clearfell logging and slash burning store significantly higher amounts of carbon than forests that have been subject to such forest management practices. Such logging and burning regimes are employed in the Ash forests of south-eastern Australia, releasing massive quantities of carbon dioxide into the atmosphere.

Scientific research has found that Mature Mountain Ash forests with an undisturbed rainforest understorey have been measured to store between 1230-1500 tonnes of carbon per hectare.¹ However, after successive clearfell logging and slash burning regimes, carbon reserves at stand age of 30-60 years hold between 387-646 tC/ha; a net reduction of carbon storage of between 843-854 tC/ha.²

¹ Dean, C., Roxburgh, S., Mackey, B., "Growth Modelling of Eucalyptus regnans for Carbon Accounting at Landscape Scale", in Amaro, A., Reed, D., and Soares, P., (eds.) Modelling Forest Systems, CAB International 2003, p.27

² *ibid.*, p.36-37

The logging and slash burning of temperate forest ecosystems is contributing to the climatic perturbations and changes that we are experiencing globally. In Victoria alone such logging and forest management practices contribute to approximately over 7.5 million tonnes of carbon dioxide into the atmosphere per year.³ This practice of clearfell logging and slash burning of Australian native forests must be phased out if we are to achieve emissions reductions.

Forests must be included in any debate about climate change mitigation techniques and mechanisms. Logging and burning forests is not only a source of greenhouse gas emissions, but as we further degrade this natural resource, we further degrade the capacity of the most effective carbon sequestration mechanism to capture and store CO₂ from the atmosphere.

Industries responsible for the degradation of our forest resource must be held accountable for the emissions they are causing from logging and burning practices as well as for the degradation of potential carbon storage sinks. The planet does not discriminate between emissions resulting from clearfell logging and slash burning to that of emissions caused by the combustion of coal for the generation of electricity. Therefore we should not discriminate either. In order for the ETS to be effective, all polluting industries and sectors of the economy must be held accountable for their emissions. For an ETS to be effective it must be fair and equitable, in that all sectors of the economy and all industries that cause greenhouse gas pollution must pay a price. Failure to do so could result in unfair market advantage of the timber industry over other industries and thus the legitimacy of the ETS would come into question. This could have major ramifications for the ETS in that it would give other polluting industries a reason not to participate.

As recognised was recognised by Professor Garnaut in the S.T. Lee lecture at the Australian National University, the largest risk to the development of an effective policy response is that vested interests would gain control of the policy process and influence an ETS to benefit their own economic interests, rather than work towards climate change mitigation. We must make sure that all polluting sectors of the economy are held equally accountable, and that includes the native forestry sector.

³ Firstly the figure of 843 tonnes of carbon emissions per hectare logged (tC/ha) was extrapolated by subtracting the mean total carbon value from a logged forest (after the fifth consecutive 80 year logging rotation) from the mean total carbon value for an undisturbed mature forest (ie. 1230 tC/ha – 387 tC/ha = 843 tC/ha). (Source: Dean, C., Roxburgh, S., Mackey, B., "Growth Modelling of Eucalyptus regnans for Carbon Accounting at Landscape Scale", in Amaro, A., Reed, D., and Soares, P., (eds.) Modelling Forest Systems, CAB International 2003, p.36). The figure of 843 tC/ha was then multiplied by the figure of 8,995 hectares which is the amount of temperate montane forest logged annually in Victoria (Source: Monitoring Annual Harvesting Performance : state wide summary report (2004-2005), commissioned and published in 2006 by the Victorian Government Department of Sustainability and Environment).