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Garnaut Climate Change Review
Level 2
1 Treasury Place
Melbourne VIC 3002

17 April 2008

Dear Sir/Madam

Submission on the Garnaut Climate Change Review

Emissions Trading Scheme and Forestry

I wish to comment on the above as follows:

I have a special interest in the forestry industry having witnessed at first hand the destructive effects of clear felling, wood chipping and burning off operations during extensive travels within my home state of Tasmania.

My first concern is that an Emissions Trading Scheme should take full effect from the date of its inception and apply to the entire forestry sector with no exemptions such as those which have previously been granted under the Regional Forestry Agreement (RFA). As an example the harvesting of native forests by Forestry Tasmania for Gunns proposed pulp mill in northern Tasmania has been exempted from assessment under the EPBC Act so long as the RFA is in force.

As Forestry Tasmania is self regulated it is practically impossible for its operations to be monitored properly and this is clearly in breach of fundamental democratic principles such as transparency and accountability.

It is therefore fundamental that the monitoring and reporting of an ETS should be carried out by a truly independent body which is accountable for its actions and not delegated to an industry or body which has vested interests at heart.

Significant and controversial projects such as Gunns pulp mill should be audited for their carbon footprint and climate change impact as part of a mandatory Federal Government assessment process prior to approval and commencement of site operations. It should be noted that Gunns pulp mill is currently undergoing Federal assessment via the EPBC Act through a series of ongoing modules and these should also have their climate change impact incorporated within the assessment process particularly as Gunns have yet to satisfy the conditions required to obtain full Federal approval of the project.

It should also be noted that the Tasmanian Government fast tracked special legislation, The Pulp Mill Assessment Act, to approve the pulp mill after Gunns withdrew from the independent planning body, the RPDC, which effectively removed all negative impacts and public consideration of the project and allowed it to be assessed by a consultant, SWECO PIC, who had vested interests in the project proceeding:

http://www.thelaw.tas.gov.au/tocview/index.w3p;cond=;doc_id=4%2B%2B2007%2BATT%40EN%2B20070503110000;histon=;prompt=;rec=;term=

The Tasmanian Government has also taken the unprecedented step of pre-empting the recommendations of the RPDC inquiry into the establishment of Marine Protected Areas by publicly stating that they will “not be agreeing to any recommendations that restrict or prevent traditional fishing activities of recreational or commercial fishers” which has not surprisingly enraged the marine science community:

<http://www.abc.net.au/news/stories/2008/04/15/2216956.htm>

<http://www.dpiw.tas.gov.au/inter.nsf/WebPages/PCOX-7CU7DE?open>

The Lennon Government has just lost its second deputy Premier in less than two years in scandalous circumstances yet revealingly these two Ministers have only been relegated to the backbenches rather than dismissed from Parliament:

<http://www.abc.net.au/stateline/tas/default.htm>

These events clearly demonstrate that the Tasmanian State Government in particular cannot be entrusted with assessing projects independently and without prejudice and that an all embracing Federal climate change audit/ETS should be instigated.

Forestry Tasmania has recklessly committed itself to a 20 year native wood supply agreement for the pulp mill and a separate agreement for the supply of (old growth!?) wood for biofuel at the mill:

<http://www.forestrytas.com.au/forest-management/wood-supply-agreements>

Long term agreements such as this are clearly at odds with Australia's commitment to reduce carbon emissions and are against the public interest especially considering that the price of credits per tonne for native timber under an ETS is likely to be far higher than the price Forestry Tasmania has negotiated with Gunns for the sale of the same timber. The provisions of such agreements should therefore be invalidated by Federal legislation invoking climate change reviews and an ETS.

It is also inconceivable that any projects which rely on native wood and old growth forest in particular for biofuel should be allowed carbon credits.

Industry submissions such as those by the Forest Industry Association of Tasmania (FIAT) dated 18 January 2008 have to be treated with extreme caution given that their primary role is to preserve their members' interests.

For example page 16 of the FIAT submission states that "carbon dioxide released by fire (from controlled burn offs and forest fire) is not included as it is assumed to be balanced by post-fire regrowth which is similarly not counted in forest sequestration accounts." This is self evidently a deliberate exclusion designed to play down the significant adverse effects of emissions from controlled burn offs.

Page 18 of the FIAT submission states that "Australia's natural eucalyptus forests are not static ecosystems, they grow old and die of old age, and they are destroyed by fire only to again regenerate. We need to dispense with the current unscientific notion that we can retain these forest/plant communities by adopting a "passive" approach to management: they will change/die in front of us if we do nothing, and change in ways that may not see them survive without management intervention." However this conveniently overlooks the fact that Tasmania's native forests also contain unique native high value species such as blackwood, celery top, huon pine, myrtle and sassafras which are not naturally regenerated by fire in the same way as eucalyptus and neglects to state that the fire regeneration practices used such as fire bombing with napalm from helicopters destroy practically everything in their wake and do not replicate nature in any way. These burn offs also causing health hazards to asthmatics, motorists etc. and damage the tourist industry due to the excessive smoke plumes generated which at times can envelope practically the whole State.

Furthermore a study published in the current issue of Nature Geoscience states that black carbon in soot has a significantly stronger greenhouse effect than previously thought meaning that the effect of soot arising from forestry burn offs has to be taken into account together with the carbon emissions:

<http://www.nature.com/ngeo/journal/v1/n4/full/ngeo156.html>

Page 24 of the FIAT submission states that "Australia's native forests yield around 5 million green tonnes of wood-chips, as residue from sawlog harvesting, which are currently exported." However this statement neglects to mention that the vast majority of the wood chip industry arises purely from the logging of native forests rather than residue. I personally have given up counting the number of log trucks carrying vast old growth logs to Gunns' woodchip mills at Bell Bay, Burnie and Triabunna as it is too depressing.

My concerns regarding the claims of industry bodies and associations are shared by NASA's top climate scientist, James Hansen who is reported in the Australian stating that global warming has plunged the planet into a crisis and the fossil fuel industries are trying to hide the extent of the problem "by misleading the public and policy makers":

<http://www.theaustralian.news.com.au/story/0,25197,23500151-11949,00.html>

The ETS Discussion Paper (Box 3-1 page 28) states that "Around 20 per cent of global greenhouse gas emissions (six billion tonnes of CO2 per year) come from deforestation and forest degradation. Australia has been at the forefront of efforts to include action on these emission sources in international negotiations. The Bali Road Map included an agreement to help developing countries measure and manage emissions from their forest sectors. Papua New Guinea and Indonesia will benefit from these initiatives. They will, with appropriate Australian technical and program assistance, be able to ensure the protection of forest sinks, reduce their emissions, and retain the biodiversity and natural capital of their communities. In a global or regional ETS, these forest resources will provide significant opportunities for wealth creating trade in offsets."

It is therefore completely hypocritical of the Federal Government to fund these initiatives but allow and even worse subsidise deforestation and forest degradation to be carried out legitimately within our own country.

There is significant scientific evidence that trees have to remain in the ground for a substantial period of time to become carbon positive. For example it is estimated that 90 year old regrowth contains less than a third of the carbon of old growth. In addition most regrowth gets harvested within 15 years which is too fast to become carbon positive.

Carbon offset schemes such as those commonly used by airlines which allow passengers to trade off their carbon emissions by investing in tree plantations are fundamentally flawed as they can cause more environmental damage than they save as new trees suck up massive amounts of water to the detriment of our environment:

<http://www.theaustralian.news.com.au/story/0,25197,23509916-11949,00.html>

<http://www.archive.org/details/FencelineFilmsTheCarbonConnection>

Furthermore plantations use vast amounts of herbicides, fertilisers and other poisons including atrazine, simazine and 1080 (many of which have been banned in the USA and/or Europe) which cause great health risks to both the human population and our native wildlife including endangered and threatened species such as the Tasmanian devil.

Tree expert, Dr Greg Moore, from the University of Melbourne's Burnley College, believes it is absolutely essential to ascribe a monetary value to trees because then they have value in terms of the decision-makers and that preserving trees is essential to our successful management of carbon emissions as they can store carbon for perhaps four or five hundred years:

<http://www.abc.net.au/gardening/stories/s2208034.htm>

The cost of all taxpayer funded subsidies such as those pertaining to Managed Investment Schemes for plantations should be included within the climate change audit so that the full social, environmental and economic cost/benefit of any project is properly assessed.

I trust that you will take my comments on board and look forward to early action to implement the findings of the Review.

Yours faithfully

M C Mars

Malcolm C Mars MRICS