

12 November 2021

Project Manager
Review of Tasmania's Climate Change Act
Tasmanian Climate Change Office

Draft Bill to amend Tasmania's Climate Change Act

Thank you for the opportunity to provide feedback on the draft Bill to amend the Tasmanian *Climate Change (State Action) Act 2008*.

Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian Private Forests Act 1994. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. Under our [Corporate Plan 2021-24](#) one of our goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

As outlined in the Tasmanian Government's response to the review, the LULUCF sector makes a key contribution to Tasmania's emissions profile and forestry is a key industry in that sector. Tasmania's forests and forest industries contribute to long term carbon emissions reductions in numerous ways, including:

- capturing and storing atmospheric carbon in growing forests, native and plantation;
- producing durable wood products which store carbon long-term and act as a renewable substitute for much more emissions-intensive building materials, such as steel, aluminium and concrete;
- providing forest thinnings, harvesting residues and wood waste for bioenergy production which can replace carbon-intensive fossil fuel sources such as coal, oil and gas, and
- protecting forest carbon stores from damaging wildfires.

PFT supports the Tasmanian Government's response to the review. We welcome in particular the proposal to develop sector based emission reduction and resilience plans as a means of implementing the mitigation opportunities identified in the Tasmanian Emissions Pathway Review Report 2021 and the draft Climate Action Plan 2021-2026.

In regard mitigation opportunities in the forestry sector, PFT looks forward to contributing to further development and implementation of opportunities in expanding agroforestry, in reducing the conversion of plantations to other land uses, in increasing the proportion of forestry logs directed to long term wood products, and in implementing measures to reduce the risk of major bushfires.

However, PFT does note some contradictions between the draft Bill and the Government Response document. In clause 5C of the draft Bill, it states that the Minister (presumably the Climate Change

Minister) will be responsible for developing the emissions reduction and resilience plans, and yet the Government Response document infers that 'relevant Ministers' will have carriage. As the forestry industry is one of the key industries in the LULUCF sector, PFT believe the Minister responsible for forestry, the Minister for Resources, should have a key role to play in the development of the LULUCF emissions reduction and resilience plan. PFT would also encourage that the plans be disallowable instruments.

The Government has allocated funding of \$10 million in the 2021-22 Budget for the next climate action plan, yet it is unclear whether this funding will flow through to facilitate implementation of the emissions reduction and resilience plans. Further clarity on this would be helpful for key stakeholders.

PFT also notes some confusion in the documentation on the timeframe for development of the initial plans. PFT believe these plans should be a Government priority given the need for urgent action on climate change.

If you have any queries or need further expansion on the points raised above, please contact me or Murray Root Policy and Data Officer.

Yours sincerely,



Penny Wells
CEO Private Forests Tasmania