Tasmanian Forest Products Association

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Consultation on Tasmania's Draft Climate Change Action Plan 2023-25

The Tasmanian Forest Products Association (TFPA) welcomes the opportunity to provide our views on Tasmania's Draft Climate Change Action Plan 2023-25.

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, processing of timber resources and manufacture of pulp, paper and bioproducts.

Background

Tasmanian forestry plays an essential role in addressing climate change and with co-operation and common understandings, we can all be united and turn our attention to real climate action, these include:

- Accept the viewpoint of the Intergovernmental Panel on Climate Change (IPCC) that the sustainable management of forests, including a mixed strategy of conservation and timber production, is more optimal for carbon reduction.
- Recognise that storing carbon in wood products and supplying society with low emission products for construction and fibre benefits the environment.
- Understand that using wood not only stores carbon but dramatically reduces fossil fuel emissions, as it means less production of high-emitting metal, concrete and plastic alternatives.
- Agree that local production of timber products, under strict forest practices regulations, will always be a lower carbon solution than importing timber from overseas.
- Agree that a mixed approach of plantation soft and hard woods, native hardwoods and specialty timbers is the responsible approach to supply society's needs.
- Realise that the majority of Tasmania's native forests are already in reserves and that only 14 in every 10,000 native trees is harvested annually, which are then regenerated, and that

this is a world-leading balance of protection and production of our forests.

The IPCC says net-zero is not enough, CO2 emissions need to go net-negative – we need to do more than stop emitting it, we need to remove CO2 from the atmosphere. Mass tree planting and locking carbon up in the built environment are two ways to do this. Actively managed forests and plantations are doing just that – removing carbon from the atmosphere – and they provide the timber and wooden products for building our homes.

Growing more timber trees in plantations and native forests locks up carbon while increasing our future local supply of sustainable timber and wood fibre. This also enhances our sovereign capability while creating sustainable jobs for thousands of people, many in rural and regional areas.

CSIRO research commissioned by the Climate Change Authority with co-funding from the Clean Energy Regulator into Australia's carbon sequestration, states forestry currently provides 'significant potential' to help Australia meet its climate goals[1].

The report, Australia's carbon sequestration potential states: "…nature-based technologies such as permanent plantings, plantation and farm forestry, and soil carbon provide significant potential…"

As timber trees grow, they absorb carbon from the atmosphere and when they're harvested, they lockup that carbon in the sustainable wooden products.

Global demand for wood fibre is forecast to grow exponentially by the middle of the century, so the opportunities for Tasmania to make an even larger climate mitigation contribution through timber trees, while supplying sustainable timber and wood fibre products is huge.

A report from Dalberg Advisors 'The growing roles of forest products in climate change mitigation', launched at COP27, recommended countries use 'nationally determined approaches' policy to grow timber and wood fibre supply.

The report clarified the challenges the world must meet as it pivots away from fossil-fuels, "If the world doesn't move to encourage growth in sustainable forest industries through climate policy, we will witness greater problems in the years and decades ahead, problems like increased illegal logging and deforestation activity in places where governance controls are most challenging".[2]

Demand for sustainably produced timber and wood fibre products is increasing rapidly, and growing more trees nationally, supported by a job rich industry, is the best way to help Australia reduce emissions while producing a supply chain for essential products, from house frames to newsprint.

The TFPA call on all policy and political decision makers to better recognise our forest industries', native and plantation sectors, potential to fight climate change and continue to meet our emission reduction targets.

[1] Fitch P, Battaglia M, Lenton A, Feron P, Gao L, Mei Y, Hortle A, Macdonald L, Pearce M, Occhipinti S, Roxburgh S, Steven A, Australia's carbon sequestration potential, CSIRO.

[2] Makeka M, The growing role of forest products in climate change mitigation, Dalberg.

Answers to specific questions under the Draft Climate Change Action Plan:

1. **Are there any other goals that should be considered?**

Another goal for consideration is: Improving resilience of our built environment

Timber and fibre are a major part of the climate change solution and governments need to recognise that. The world wants timber and fibre and the trees that produce timber and fibre lock away carbon. We can solve two local and global problems by growing more trees and engaging in sustainable forestry – providing much needed essential products and fighting climate change.

The Australian and State Governments should not only recognise the climate change mitigation benefits of timber, but also provide policies that incentivise greener buildings that maximise timber use.

Building new homes from timber could save about 10 per cent of the world's carbon budget which is needed to limit global warming to 2 degrees according to a new study from the Potsdam Institute for Climate Impact Research.

This research clearly demonstrates that increasing use of timber and fibre is critical to fighting climate change and that we need more sustainable forestry. The study found if 90 per cent of the world's new urban population is housed in new timber mid-rise buildings – 106 gigatonnes of CO2 could be saved by 2100[3].

Further proof to the research undertaken by the Potsdam Institute for Climate Impact Research, the New Clean Energy Finance Corporation (CEFC) research shows expanding timber use in construction will significantly cut carbon emissions in the building and construction sector.

The CEFC's *Australian buildings and infrastructure: Opportunities for cutting embodied carbon* report shows that the more engineered timber used in new office and mixed-use buildings, the better its embodied carbon reduction[4].

This CEFC report reinforces that we can do more to reduce our carbon emissions in the built environment and should build more medium and high-rise buildings from engineered timber.

The report provides real case studies showing that building with timber reduces embodied carbon up to 75 per cent. Its modelling also shows that replacing 50 per cent of a building's traditional steel and concrete materials with engineered timber would result in an 11 per cent reduction in the building's embodied carbon.

To meet the Australian Government and Tasmanian Government's housing strategy projections we must plant new timber trees to meet our future needs and to allow a greater take-up in mid and large-scale timber construction.

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[3] Mishra, A., Humpenöder, F., Churkina, G. et al. Land use change and carbon emissions of a transformation to timber cities. Nat Commun 13, 4889 (2022)

[4] CEFC, Australian buildings and infrastructure: opportunities for cutting embodied carbon, 2021

3. Priority area 1 - Information and knowledge:

Will the key action under Priority area 1 help support decision making for you and your organisation?

The TFPA supports the development of a whole-of-government framework to embed climate change into Tasmanian Government decision making.

We support the alignment of State and Local Government policies. We also support the goal to increase new timber plantations and expanding the adoption of agroforestry.

To this goal of increasing new timber plantations, it is cognisant for each level of government policies working together. Currently there are examples where improvement is needed.

From a State perspective there is a Protection of Agricultural Land (PAL) Policy. If we want to provide landowners and farmers, the choice to plant timber plantations on their land the PAL Policy needs to be expanded to include all classes of soils where plantations can be grown.

Additionally, from a local perspective the State planning reforms, while on paper it looks like a good policy towards a one planning model, we are seeing Local Councils making decisions that are to the detriment of having the opportunity to increase new timber plantations. For example, re-zoning land or the interpretation of carbon or biodiversity plantings versus timber plantations.

What types of projects should be supported under the final action plan?

An important project to be considered is to research the carbon mitigation and social benefits between multiple-use state forests contrasted with national parks.

An example that has been completed recently is Queensland research that showed multiple-use state forests used for sustainable timber production provide greater overall carbon mitigation and social benefits than national parks.

The Indufor-Natural Capital Economics study found – 'State forests…would have a slightly superior outcome in terms of carbon sequestration and storage in forest and offsite storage and substitution impacts, in comparison to formally protected forests, over the longer term.'[5]

The study also concludes the net benefit for state forest management in South and Central Queensland equated to $1.2 billion in additional social benefits over the next 100 years, or 30 per cent higher than if the forests were national parks. The study compared management outcomes in state forests and national parks using cost benefit analysis.

This research clearly demonstrates the higher carbon value and community benefits derived from native forests where sustainable timber harvesting takes place. Not only is biodiversity protected, but the harvested timber also goes on to create quality, sustainable and essential products where carbon is locked up, thereby fighting climate change. It also reinforces that sustainable timber harvesting is not a common or significant threat to forest biodiversity.

This study shows the beneficial triple bottom line outcomes from the multiple-use management of state native forests at a regional level.

[5] Indufor & Natural Capital Economics (2022) Assessing the net benefits of multiple use native forest management in Queensland. Project report prepared for the South & Central Queensland Regional Forestry Hub, September 2022.

4. Priority area 2 – Transition and innovation

Will the key actions under Priority area 2 support Tasmania to achieve its 2030 emissions reduction target and continued emissions reduction across Tasmania?

An action that hasn't been articulated within the draft climate change action plan is the importance of bioenergy to contribute to Tasmania's renewable energy future and to reduce emissions.

Renewable bioenergy is energy derived from sustainable biomass. Biomass can be produced as a by-product of forestry, sawmilling and agriculture activities, that also produce integrated renewable and recyclable wood and paper products.

Wood can be combusted to produce heat and to generate steam. When wood is used to generate energy, it can replace fossil fuels such as coal, oil and natural gas. Use of fossil fuel releases carbon from a very-long-term store that cannot be replenished in less than geological timescales. The use of sustainably harvested wood to generate energy thus eliminates greenhouse gas emissions that would have resulted from the use of fossil fuels.

TFPA supports policies that:

- promote renewable energy opportunities for bioenergy, including for industrial heat and biofuels; and
- support the inclusion of both plantation and native forestry harvesting and processing residues from sustainably managed operations as renewable energy sources.

The other action for consideration in the draft climate change action plan is the benefit timber and wooden products provide by storing carbon.

While there are policies and schemes that acknowledge the role trees play in sequestering carbon, they need to better recognise the role of wood products in storing the carbon for the long term. Recognition of the carbon stored in wood products, both in use and after disposal in landfill further highlights wood's environmental credentials.

Substitution of wood products for more energy-intensive building materials adds further to the greenhouse benefits of forestry because wood products typically require less energy in their manufacture than alternative materials.

5. Priority area 3 – Adaptation and resilience

As highlighted in the draft climate change action plan Tasmania is expected to experience increased temperatures and longer fire seasons, with more frequent and intense bushfire events.

Bushfires pose a massive threat to the forestry industry, which is why the industry invests heavily in resources to combat this risk, from skilled operators and equipment to planned burns and fuel reduction programs.

Research undertaken following the 2016-20 Australian bushfires on its severity and extent stated, 'It is important to note, however, that there is no scientific consensus about the possible effects of

logging on fire risk, despite many media claims to the contrary. The relationship between logging and fire is contingent on fire weather, landscape settings and environment.'[6]

It went on to say that our research is deeply concerning because it signals that there are no quick fixes to the ongoing fire crisis that is afflicting Australia and other flammable landscapes globally. This crisis is being driven by relentless climate change, which has the terrifying potential to switch forests from critical stores of carbon to volatile carbon sources (Bowan et al, 2021).

The TFPA support the recognition of climate change and the affects it will have on bushfires for Tasmania. We also need to be aware the importance of management of our environment to minimise the risk of bushfires across our landscape.

On a final note, the United Nations' World Forestry Congress has confirmed sustainable timber production is crucial to achieving the international climate and environmental goals needed this century. The World Forestry Congress Ministerial Call on Sustainable Wood confirmed that the:

Sustainable production and consumption of wood promotes forest conservation, enhances the value of forests and mitigates climate change. Building and living with wood responds to an increased demand for renewable materials and provides impetus for green recovery. Sustainable wood offers solutions across multiple value chains, including construction, furniture, packaging, renewable energy, biomaterials for clothing and biochemicals.

The TFPA look forward to continuing to participate in the ongoing consultations in developing Tasmania's Climate Change Action Plan 2023-25.

Yours sincerely,

Nick Steel
Chief Executive Officer

[6] Bowman, D.M.J.S., Williamson, G.J., Gibson, R.K. *et al.* The severity and extent of the Australia 2019–20 *Eucalyptus* forest fires are not the legacy of forest management. *Nat Ecol Evol* **5**, 1003–1010 (2021).