



3 April 2023

Climate Change Office
Renewables, Climate and Future Industries Tasmania
Department of State Growth
GPO Box 536
HOBART TAS 7001

To whom it may concern,

The Tree Projects is a non-profit organisation that aims to educate the general public about the importance of trees and our forests and advocates for their protection. The Tree Projects would like to make a submission regarding the Climate Action Plan, specifically addressing areas that relate to Tasmania's forests and its natural environment.

Climate change will have a very big impact on Tasmania's trees and forests, and on all of our state's natural environments. The greatest risk is through the increase in fire danger, but there are also many other stressors, such as hotter weather and changes in herbivore and pollinator numbers. If we are to protect Tasmania's natural environment, we must be doing everything that we can to prevent catastrophic climate change. The threat of climate change is equally as significant to us as humans as well.

I have a PhD in forest ecology, and last year I set about trying to understand how many emissions were coming from the native forest logging industry. Due to the way that emissions are reported, it is impossible to find this out. We need more detailed emissions reporting for the LULUCF sector in which the emissions from forestry operations and land clearing is separated out from the sequestration of our forests. The net figure that is currently provided does not provide policy makers and the general public with the correct information.

I ended up having to calculate the emissions from native forest logging myself, with the assistance of some of Australia's leading forest carbon scientists. What I found was that native forest logging is the highest emitting sector in the state. This is why we need adequate reporting, as no one in Tasmania knew that this one sector in our state was producing the most emissions.

If Tasmania wants to take real action on climate change, we need to end native forest logging immediately. My campaigning on this issue with members of parliament has fallen on deaf ears, and despite my many requests to meet with members of the Government on this issue, no one has met me, let alone responded to my emails.

The Tree Projects is pleased to have an opportunity to make a submission to the Climate Action Plan. Our response to the six questions will mainly focus around forests and the environment.

1. DO YOU AGREE WITH THE PROPOSED VISION AND GOALS FOR THE ACTION PLAN? WHICH GOALS ARE YOU MOST SUPPORTIVE OF? ARE THERE ANY OTHER GOALS THAT SHOULD BE CONSIDERED?

The goals of the Action Plan are a step in the right direction, however the goals need to be a lot stronger to make a significant impact on climate change. Generally, there needs to be more funding to incentivise the public and business to switch to renewables and towards emissions saving technology. There is also a lack of specific targets with many vague statements. For instance, "Increasing public and active transport" does not outline any clear target or goal, or go into much detail at all. Exactly what, when and how needs to be spelled out.

Of the goals relating to forests, The Tree Projects supports to goal of increasing plantations and agroforestry. Farm Forestry is the best solution for meeting our future wood needs. Planting trees into existing agricultural landscapes has been proven to be beneficial for farm productivity and for improving biodiversity outcomes. It is also a better solution from a bushfire safety viewpoint than large stretches of plantations which can increase the fire severity of a landscape.

2. WILL THE THREE PRIORITY AREAS (1) INFORMATION AND KNOWLEDGE (2) TRANSITION AND INNOVATION AND (3) ADAPTATION AND RESILIENCE, HELP TASMANIA ACHIEVE ITS LEGISLATED 2030 EMISSIONS REDUCTION TARGET, AND ITS VISION FOR ACTION ON CLIMATE CHANGE? ARE THERE OTHER ISSUES NOT COVERED BY THE THREE PRIORITY AREAS?

Tasmania's legislated target is so weak, that we literally have to do nothing to in order to meet this target, in fact we already have met it for seven years in a row. This clearly shows that we are not aiming high enough and need a stronger target.

We also need to have sectoral targets as it is imperative that we are reducing emissions across all sectors. We cannot just rely on the sequestration of our forests to do all the heavy lifting for us. LULUCF is prone to its own natural fluctuations. Many academics suggest that 'bio' carbon (organic biomass ie. LULUCF) and 'geo' carbon (fossil fuel generated carbon) should be treated separately, as they represent two completely different stocks of carbon.

3. WILL THE KEY ACTIONS UNDER PRIORITY AREA 1 HELP SUPPORT DECISION MAKING FOR YOU AND YOUR COMMUNITY OR ORGANISATION? WHAT TYPES OF PROJECTS SHOULD BE SUPPORTED UNDER THE FINAL ACTION PLAN?

The Tree Projects relies heavily on science for our communications, and we are always happy to see more research done. However, these findings need to be clearly articulated to the general public and policy makers. Furthermore, these findings need to be acted upon and properly adopted into policy. The legislated targets under the Climate Change Amendment Bill from last year do not reflect a science-based approach.

Most importantly, we feel that there needs to be a change to the way that emissions are being reported. Currently, the LULUCF emissions are reported as just one net figure. As mentioned above, this does not allow policy makers and the general public to be aware of the full story of what is going on in regards to emissions from our forests. The emissions from native forest logging need to be reported separately from the sequestration of our forests.

My Forest Carbon report from last year has highlighted that emissions from native forest logging is higher than any other sector in Tasmania. If emissions were reported properly, we would have known about this huge source of emissions for much longer and action may have been taken to address this.

It is critical for these elements be reported separately as what they are: a source and a sink. They can't be used to cancel out each other and just be reported as a net figure. Our policy makers cannot make the best decisions without this information.

4. WILL THE KEY ACTIONS UNDER PRIORITY AREA 2 SUPPORT TASMANIA TO ACHIEVE ITS 2030 EMISSIONS REDUCTION TARGET AND CONTINUED EMISSIONS REDUCTION ACROSS TASMANIA? WHAT TYPES OF PROJECTS SHOULD BE SUPPORTED UNDER THE FINAL ACTION PLAN?

If Tasmania wants to make a real reduction in our state's emissions then native forest logging needs to be addressed. It is currently the highest emitting sector in the state, with emissions equivalent to 1.1 million medium sized cars. Currently the native forest logging industry losses millions of dollars each year and is propped up by government subsidies and grants. Native forest logging has no place in Tasmania's clean, green future.

Our state could go even further by legislating a stronger targets and having sector plans with ambitious targets that represent real emissions reductions, not just reliance on offsetting. The money saved from no longer propping up the native forestry industry could go towards incentives for encouraging people and businesses to switch to renewables and emissions saving technology.

In short, ending forest logging would make a real impact into reducing Tasmania's emissions. We could go even further by encouraging all sectors to make meaningful cuts to emissions.

5. WILL THE KEY ACTIONS UNDER PRIORITY AREA 3 BUILD RESILIENCE AND SUPPORT ADAPTATION PLANNING ACROSS TASMANIA? WHAT TYPES OF PROJECTS SHOULD BE SUPPORTED UNDER THE FINAL ACTION PLAN?

The lack of resilience of our environment to climate change is worrying. Our forests, and the rest of Tasmania's irreplaceable natural assets, are greatly threatened by climate change. Of these, bushfires are the greatest threat.

In 2019, 15 of the 26 largest trees in Tasmania (and some of the largest in the world) were wiped out in the Rivereau Road fire that decimated the Arve Valley. In that single event, we lost trees that we will not see the likes of again. They are irreplaceable.

When the fire approached 'Centurion', which is the world's tallest hardwood tree, authorities had the foresight to implement a plan to clear around the tree before the fire hit in order to try and protect it. Unfortunately, the exact location of this tree was not known and hazard reduction activities took place around the wrong tree. Centurion is still alive, but sustained massive amounts of fire damage, with fire burning the inside of the tree all the way up to the crown.

Tasmania needs a well thought out and detailed plan on how to best manage and prioritise our natural assets in the face of bushfires. If detail plans had been made, we would not have seen the mistake made with Centurion.

Along with planning, we need adequate funding to be able to invest in the best fire-fighting technology that we can purchase and employ more remote area fire fighters. While this will not be a silver bullet, it would mean that we are as prepared as possible to tackle bushfire threats.

Resilience and supporting adaption is a very important aspect to address, as we will be experiencing greater climate change impacts in the very near future. However, resilience is nothing if we are not taking the strongest emissions reductions that we possibly can.

6. ARE THERE OTHER WAYS THE GOVERNMENT COULD MAKE ITS ACTION ON CLIMATE CHANGE, AND PROGRESS TOWARDS MEETING ITS TARGETS, MORE TRANSPARENT AND ACCESSIBLE?

The State Government needs to end native forest logging. Its the highest emitting sector in our state. It represents a low-cost, effective and immediate way for Tasmania to reduce its emissions.

The Tasmanian Government needs to adopt a stronger emissions reduction target. While the emissions of our state may be small on a global level, we have a joint responsibility as global citizens to take immediate and ambitious action on climate change.

So much of what makes Tasmania such a wonderful place is due to our environment and natural places. These, including our forests, are under dire threat from climate change. We must take strong action if we are to protect these precious places, and our growing tourism economy which relies on them.

We need to aim higher. We need to take a science-based approach to climate action and make real cuts to our emissions. Ending native forest logging is one of the easiest ways we can reduce our emissions. Other suggested actions are:

- All major projects will be assessed for their scope 1, 2 and 3 climate change impacts and on their impact on environments threatened by climate change.
- No new coal or gas developments would be approved by a government that has embedded climate change in its decision making.
- Real GHG emissions reduction, rather than a reliance on carbon offsets.
- Tasmania's highly polluting businesses will need to reduce their emissions, without the use of offsets.

Thank you for taking the time to review my submission. If you have any questions, please do not hesitate to contact me.

Best wishes,

A handwritten signature in black ink, appearing to read 'Jennifer Sanger', written in a cursive style.

Dr Jennifer Sanger

The Tree Projects

www.thetreeprojects.com

Further information about my Forest Carbon report can be found on our website at
www.thetreeprojects.com/forestcarbon