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**To:** Bio Energy  
**Subject:** Submission on the draft bioenergy vision for Tasmania, by R. Rands

Dear Sirs and Madams,

I have analysed the draft plan (1) and thank you for the opportunity to make a public contribution to an important sustainability issue in our current economy and ecology. My comments are analytic. I have no vested monetary interests

'Biomass resources' are mentioned in the glossary, but are not precisely defined. The term does not appear elsewhere in the draft. This term suggests to me that a wide range of woody plants are candidate inputs for bioenergy conversion. Some of the seven 'Interstate Bioenergy Examples' given on page 22 do not clearly identify the source and nature of their biomass resources.

Are living plants to be harvested specifically for the production of bioenergy? Are state forests or other forest resources under consideration as sources of 'biomass resources'? The graph of solid waste resources shown as Figure 1 on page 6 identifies 53% of the estimated available biomass resources coming from harvesting and processing residues.

If state and other forests are intended as biomass resources, this must be more clearly specified. A caveat offered is not reassuring, as it places a hypothetical need for native forest harvesting, to provide biomass resources, in an indefinite time frame. On page 9, the document states:

"The harvesting of native forests specifically for renewable energy production is **not currently** required or anticipated to be a part of the Tasmanian Renewable Energy Target (TRET). The focus of the Tasmanian Bioenergy Vision is therefore on the utilisation of organic waste and residue streams." (emphasis mine)

The statement is open to criticism as suggesting that native forests may be used as biomass resources in the future. Native forests are too valuable as active carbon sinks to turn them into fuel.

The suggestion that 'biomass feedstocks' is another word for native or other forests is implicit in this statement from page 8, which broadly outlines types of public and commercial agreements:

"Bioenergy facilities are long term investments that require long term energy offtake and feedstock supply agreements and confidence that facilities can operate for long time horizons to achieve a return on investment."

There is no net gain in atmospheric CO2 removal through commitment of native or other forests to commercial agreements that eventuate in the destruction of mature forest or the continual growth and regrowth of immature forest. Business plans that are to be considered sustainable must offer an absolute reduction in CO2, across all their elements. A net reduction in CO2 will not achieve the necessary goal of atmospheric CO2 reduction.

I expect you will receive many more submissions on this theme of Tasmania's forests and their use as 'renewable resources'. My comments are not those of an expert, though I have a biology degree and a developed understanding of ecology, evolution and energy flow through natural and built systems. I mention that because the Draft offers no specific analysis of the projected impact of bioenergy implementation strategies on Tasmania's built and natural systems.

The references offered in the Draft are all very general, and this one is incomplete: 'O'Hara I, Robins K, Melssen B.

2018. Biofuels and bioproducts: a growth industry for Australia'. Could you kindly provide its provenance, and a link? I could not retrieve this reference on Google or Google Scholar, which suggest to me that it is not a peer-reviewed assessment of the impact of biofuel use increase on the built environment (say, the economic impacts) or the natural environment (the ecological impacts).

Surely an environmental impact assessment of this Vision is in order.

I look forward to reading the comments on this draft, and responses to those comments. I hope that independent experts are able to respond sufficiently well, given the very short time frame for comment.

Regards,  
Robert Rands  
BSc biology, graduate certificate in Geographic Information systems



(1) [https://recfit.tas.gov.au/consultation\\_and\\_community/draft\\_bioenergy\\_vision\\_for\\_tasmania\\_-\\_consultation\\_paper](https://recfit.tas.gov.au/consultation_and_community/draft_bioenergy_vision_for_tasmania_-_consultation_paper)