



Bio-Energy from NSW' Native Forests?

20-Aug-13

Submission on the Draft ***Protection of the Environment Operations (General) Amendment (Native Forest Bio-material) Regulation 2013***

Thank you for the opportunity to comment at this historic turning point in a critical decade of global, national and NSW Governance of native forests. Our recommendations span three subjects:

- A. **CARBON STORAGE, GREENHOUSE GAS EMISSIONS & CARBON SEQUESTRATION**
- B. **NSW FORESTRY CORPORATION & CONFLICT OF INTEREST**
- C. **ENVIRONMENTAL PROTECTION**

A: Can NSW profit from Carbon Credits via 'Honest Carbon Reporting' from State Forests?

Trees are our Earth's original and best carbon capture and storage devices. Older native forests store proportionally more carbon than the short-lived plantations which provide 80% of Australia's wood.

Over 80% of logs from NSW State Forests today are trucked directly to woodchip mills. *Less than 20% has ever come from saw-mill waste.* Common sense observation and peer-reviewed science confirms that approximately 60% of native forest carbon is wasted as gas pollution, as a result of logging and burning operations in NSW State Forests. Approximately 30% goes into short-lived paper products and less than 10% survives in solid wood. NSW State Forests can be managed as profitable carbon stores continually sequestering more carbon every year. Native forest logging Industry and captive forest Agency claims of amazing 'carbon neutrality' today are a vast self-serving under-valuation. Talk of any 'Renewable Energy' industry collecting post-logging biomass from the forest floor also seems economically unviable and mischievous (like 'Clean Coal?'). Native Forest Bio-Energy is less efficient than brown-coal fuelled power stations. Government subsidies for logging are much better spent on really renewable solutions like solar. NSW should stop pollution debits and bank the carbon credits.

Both the Coalition and Labor parties support **Kyoto2 'Forest Management' Guidelines** due to be published in October, for ratification at COP19 in December 2013. Australia's PM will sit alongside other world leaders at future G20 Climate Action Meetings where they will need to defend emissions from State Forests they control in partnership with State Governments via Regional Forest Agreements (RFAs). Both major parties also support Australia's Carbon Farming Initiative (CFI). CFI-funded Regional NRM Plans (2013-2020) are now being updated to manage 'climate ready' landscapes on the North Coast, in the Hunter and South East – all three mostly forest regions! We invite the NSW Govt. to join us to study these plans and **CFI 'Forest Management' Methodologies** being published soon.

B: NSW FORESTRY CORPORATION & CONFLICT OF INTEREST

Managers of the previous Forests NSW used to boast of 'not costing NSW Taxpayers a cent'. They simply paid for themselves by over-selling NSW's natural assets to logging companies and wood-chippers. Saw-logs are now predictably in short supply and they are now financially dependent on wood-chippers. My local Batemans Bay Saw Mill closed this year and the Government is well aware of Boral's legal claims caused by shortage of saw-logs in both the Northern & Southern Regions. As a member of the Forest Stewardship Council (FSC), I saw overseas markets increasingly rejecting wood products from State Forests in Australia because they are not sustainable (FSC Certified). Boral has now announced it is getting out. Nippon-Paper's Eden Woodchip Mill is making losses in competition with plantations. Former Labor Minister McDonald was a shameless supporter of Forests NSW. Honorable new NSW Minister Katrina Hodgkinson announced one reason for creating our new Forestry Corporation of NSW was "to protect them from political interference". Is this EPA Amendment evidence of that?

C: **ENVIRONMENTAL PROTECTION:** We commend the EDO (NSW) submission on this vital subject.

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