

We support our Government's pledge to 'do our best' for Australia and Mother Earth (good planets hard to find).

1. We therefore firstly congratulate Minister Hunt and the Australian Government upon completion of the first historic round of ERF 'reverse auctions'. We particularly applaud the 'Natural Forest Carbon sequestration' credits. Perceptive media comments last week included:

Sydney Morning Herald 24-Apr-15 "Carbon cuts – Canberra spends up big in first climate auctions" by Tom Arup & Lisa Cox; "... government is yet to implement the other part of the climate Direct Action plan, so called *safeguard mechanisms* that would seek to put limits on emissions from industry.

The Australian's 'Centenary of Gallipoli' edition of 25-Apr-15 "Auction ensures carbon abatement investment" by Sid Mayer; "Carbon Market Institute's Peter Castellas said "The ERF auction has restored certainty and will mean continued investment in carbon abatement activities. Crediting and purchasing arrangements under the ERF however only one important component of suite of policy measures needed to achieve Australia's target."

2. Coverage: Why are some Government-controlled\* 'State Forests' not being proposed for both re-growth carbon sequestration and massive emissions reductions? (Didn't Australia promise to 'do our best' on Climate Change Action?)

We refer to logging, burning and wood-chipping of Australia's most carbon-dense natural Native Forests (NF), 'land use' managed under \*Regional Forest Agreements (RFAs). *e.g. 90% of whole-logs from East Gippsland and South East NSW are trucked directly to the Eden Woodchip Mill.* Eden-Monaro is at the heart of the Great Southern Koala Forest (GSKF) – refer attachments, incl. Nature NSW 2015 magazine. Truly sustainable 21<sup>st</sup> Century State Forest Stewardship is overdue.

Today **Renewable Energy Certificates** (RECs) are rightly excluded from Native Forests by the formal *'highest value test'*. (*Refer 'Burning NF Biomaterial for Electricity' from NSW Parliamentary Research Service No.3 March 2014, page 5.*) Evidence suggests up to 60% of NF carbon is lost as 'up-front' **avoidable emissions**, so logging State Forests primarily for NF Woodchip Mills and/or a Bio-Energy source makes them more polluting than our dirtiest coal-fired power stations.

The above opposes 'whole-log' NF Bioenergy promoted in Senator Colbeck's Forest Industry Advisory Council (FIAC) 'strategic directions paper', with submissions closing 5-Jun-15. Do those 'Evidence-based Policy Questions' remain unanswered on (a) Jobs, (b) Social Licence, (c) Forest 'Services' (Carbon, Tourism, Water, Wildlife and Wood-products)? Is Australian Governments' legal logging and burning of some State Forests worse than Indonesia's illegal logging? Why not apply ERF De-Forestation Method (instead of semantics) to measure clear-felling old-growth State Forests?

#### 3. Establishing baselines?

Does Australia's Target and Forest Inventory reflect Native Veg. laws and abatement opportunities from State Forests?

## 4. New investments?

Can job-creation and environment services become 'part-and-parcel' of ERF Land Sector proposals for State Forests?

# 5. Emissions management?

Will Australia's post-2020 Targets be ambitious enough, and management of the NF Logging Industry stringent enough?

### 6. Electricity?

Will Tasmania spoil their 'Green image' & Hydro by moving into high-polluting whole-log 'Bio-Energy' from NF sources?

### 7. Administration?

We welcome the first ERF Auction Data. Can we please now have it 'by method' to promote ERF and secondary markets?

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