

South East Region Conservation Alliance Inc.

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Submission to the Senate Standing Committee on the Environment and Communications from the South East Region Conservation Alliance (SERCA)*

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Re the Climate Change Bill 2022 and the Climate Change (Consequential Amendments) Bill 2022

We are requesting that the Climate Change (Consequential Amendments) Bill exclude native forest biomass as an eligible fuel under the Renewable Energy (Electricity) Act 2000 and any other relevant legislation.

This will help prevent a major increase in Australia's carbon emissions and the emissions of countries which might buy biomass from our forests to burn. We want to see an end to the industrial scale use of native forest bioenergy and to remove its inclusion as an eligible fuel within the Renewable Energy legislation.

We ask that you recommend

- 1. reinstatement of native forest biomass as ineligible to earn carbon credits as a renewable energy fuel; and
- 2. temporarily banning the export of native forest wood biomass for electricity production.

Currently in Australia there is a strong push from some parts of industry to burn native forest wood for electricity production, taking advantage of faulty carbon accounting rules that do not take full account of the emissions when the wood is combusted. Nor do they take account of the time-scales in which logged forests regrow: emissions from logging occur immediately, emissions reductions are needed urgently, but replacement draw-down from the atmosphere can take decades if not centuries.

Eligibility to earn carbon credits under these faulty domestic and global accounting rules gives industry a financial incentive to log and burn more native forest wood for the domestic and the export market.

It means that native forest biomass will compete with genuine renewables like solar and wind and other new technologies, and slow the transition to renewables that is needed to meet the Government's commitments to tackling climate change domestically and as part of Australia's international obligations. Under the Gillard Government native forest biomass was made ineligible to earn carbon credits. The Abbott Government removed that ineligibility. We are asking the Senate to reinstate it.

Additionally, if left unchanged, the current rules will further intensify the impacts of the ecologically damaging and unsustainable native forest logging industry, whose harms to biodiversity and threatened species are evidenced most recently in the 2021 State of the Environment Report.

Given the findings of the State of the Environment Report it is inconceivable that current logging can comply with the requirements of Regulation 8 of the RE Act, especially regarding maintenance of the biological diversity of forests.

And all the more so for the native forests of SE NSW that have been industrially over-logged and woodchipped, largely for export, since 1968; and are now severely impacted by the 2019-20 bushfires. Contrary to scientific advice logging is continuing in both burnt and unburnt SE forests, and much of it contrary even to the current inadequate logging rules.

For the SE forests of NSW in particular preventing burning of native forest biomass for electricity domestically is only part of an adequate climate change policy. Dealing with exports is an aspect that requires a broader reassessment of forest and forestry policies within the climate context. Pending that broader reassessment SERCA asks the Senate Committee to consider recommending a temporary ban on exports of native forest biomass for electricity production, within the Climate Change (Consequential Amendments) Bill 2022.

* SERCA is an umbrella group for a dozen local and regional conservation groups in the south-east of NSW. Its aims are to end logging and woodchipping of native forests by 2024, thus completing the already near-complete transition of the forestry industry from a native forest to a plantation base; and to encourage new management of the forests and their wildlife and water supplies based on their intrinsic ecological values, and their essential contributions to climate stability, clean air, and public health.

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