From:	Karen Spinks
To:	Climate Change
Subject:	Submission on the Draft Emissions Reduction and Resilience Plan (ERRP) for the Land Use, Land Use Change and Forestry (LULUCF)
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Current state of play

The LULUCF sector has been a carbon sink since 2012, this is due to a dramatic downturn in the amount of native forest logging during the collapse of Gunns and the implementation
of the Tasmanian Regional Forest Agreement around this time. This corresponded with a reduction of emissions in the LULUCF sector by 17 million tonnes of carbon.

The state of play report constantly highlights the false notion that forestry is critical to Tasmania and climate solutions, while completely avoids the fact that it is the highest emitting sector in the state (Forest Carbon Report). The carbon sink of Tasmania's forests is
not guaranteed in the future as risks from bushfires, heatwaves and drought will negatively impact forests.

Fundamental Problems with the ERRPs

I believe there are some fundamental problems with every sector's ERRP. You may like to address these in your submission. Please use the recommendations below as a guide for your own submission.

Recommendation 1:

Amend the Climate Change Act to give the broader Tasmanian community the same opportunity that business and industry have in formulating the ERRPs.

As it stands, the Climate Change (State Action) Act (2008) legislates that business and industry must be consulted in developing the sector based ERRPs, while the broader community (like scientists, community groups, etc.) is excluded. This means that Government action on climate change is strongly influenced by those causing the pollution in
the first place.

Amending the Act to include the broader community means emission reduction and resilience projects are more likely to follow a science based approach and meet community
expectations.

Recommendation 2:

Tasmania's Scope 2 and Scope 3 emissions must be reported
and actioned on in Tasmanian climate change assessments.
Currently, only Tasmania's Scope 1 emissions - those emissions we produce ourselves - are considered in our climate change planning. To understand the full picture of how Tasmania impacts the global climate we need to consider our indirect emissions, which are our Scope
2 and Scope 3 emissions.
The State of the Environment Report highlighted that Tasmania's "indirect emissions from everything Tasmania imports and exports (excluding electricity) are more than ten times larger than its direct emissions". As a wealthy nation, we need to take responsibility for our indirect emissions by actively recording and reporting these emissions, so we can start taking meaningful action to reduce them. Learn more about emission Scopes: in general here, in a Tasmanian context here (pg 396).

Recommendation 3:

End native forest logging.
Native forest logging is the highest emitting sector in the state - it emits 4.6 million tonnes of carbon each year (Forest Carbon Report). Ending native forest logging is by far the most effective action that Tasmania could take to reduce its emissions. The draft plan completely fails to address this important area of emissions reduction.
Recommendation 15 from the State of the Environment Report recommended "the Tasmanian Government continue efforts to reduce greenhouse gas emissions across all sectors". It also highlights native forest logging as one of the main pressures on our greenhouse gas emissions.
When forests are logged, there is an immediate release of emissions. If we regrow these forests it will take decades or centuries for those emissions to be recaptured by regrowing trees.

LULUCF Sector Recommendations

1. Transparent, accurate and disaggregated reporting and recording of greenhouse gas emissions and sequestration in the LULUCF sector. Net reporting of carbon emissions and sequestration is a hindrance to good climate policy. We need separate reporting of greenhouse gas emissions and sequestration from all sub-sectors, notably native forest logging and plantation forestry on public and private land. This data should be publicly available, as well as the methods for its recording and reporting.

2. We cannot continue to rely on the LULUCF sector to 'net out' the emissions from other sectors. The draft plan correctly identifies that the capacity of the LULUCF sector to sequester and store carbon will be impacted by climate change driven bushfires, droughts and insect attacks. Tasmania needs to take urgent action to reduce emissions across all sectors.

3. Forests should not be used as a carbon offset. There is a strong emphasis in the plan to pursue carbon offsetting through the Australian Carbon Credit Unit (ACCU) scheme. They are an unstable form of carbon credit due to the risk of bushfire and drought, and they cannot be used as a substitute for inaction in emissions reductions in other sectors.

4. Farm forestry is the biggest strength in the draft plan. Farm forestry is a sensible way to grow plantations, with benefits to farms. It also reduces the risk of bushfires compared to large scale plantations.

5. Adapt to new realities of climate and biodiversity crises. With climate change and loss of biodiversity comes new threats, including increased fires, drought, forest dieback, and invasive species. We need to address these threats through restorative and inclusive programs that bring the community together.

6. Mature, intact forests are more resilient to fires, droughts and insect attack, so often the best solution is to leave forests alone. The draft plan recommends a very management heavy approach for improving forest resilience. Fuel reduction burns may only be appropriate in some forest types. For wet eucalypt forests, reduction burns and thinning may even increase the flammability of a forest.

7. Bioenergy poses a significant threat to native forests and their sequestered carbon. The draft plan mentions exploring the use of biomass for energy production. Biomass sources such as agriculture and plantation residues are limited. It is highly likely that this may be filled with low quality woodchip and exacerbate native forest logging. The best climate solution is to leave forests standing, so carbon is stored.

Sincerely,
Karen Spinks