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Renewables, Climate and Future Industries Tasmania,
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Consultation – Draft Emissions Reduction & Resilience Plan – LULUCF Sector

Thank you for the opportunity to provide feedback on the draft Plan. Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our Corporate Plan 2024-27 one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

Our submission provides responses to some of the consultation questions posed in the draft Plan.

Q. *What future opportunities (outlined in this draft Plan) do you think will have the most impact?*

PFT is broadly supportive of the future opportunities outlined in the Plan. We are particularly supportive of those that are related to, and support, the original four LULUCF opportunities identified in the 2021 Emissions Pathway Review Report. These were: i) reduce the conversions of plantations to other land uses, ii) increase commercial plantations and agro-forestry tree plantings, iii) increase the proportion of forestry logs to long-term wood products and increase domestic processing, and iv) introduce measures to reduce the risk of major bushfires. Accordingly, PFT recommend the following:

Under priority area 1 we believe the following opportunities will have the most impact:

- *Explore options such as financial support or conducting pilot projects to measure and report the benefits of increased carbon sequestration through:*
    - *active plantation management practices, including pruning, thinning and increasing commercial plantation harvesting cycles*
    - *innovative silvicultural practices such as thinning and alternatives to post-harvesting burning*
    - *restoration of degraded lands, for example alternative management practices and regenerative agriculture.*
- *Continue to work with PFT and other partners to support farmers and other private landholders to plant and grow more trees on their properties.*

Under priority area 2 we believe the following opportunities will have the most impact:

- *Support the forestry industry, including smaller industry participants, through targeted information resources and education programs, to understand potential future changes in demand for emerging wood and fibre products, biomass and biofuels, and accessing insurance and financial markets.*
- *Promote and explore the use of natural capital accounting frameworks for valuing ecosystem services in Tasmania.*
- *Explore opportunities to increase the uptake of bio-energy, the use of plantation forestry residues, salvage harvesting and agricultural waste streams for feedstock and opportunities for renewable energy.*
- *Continue to work with the State Planning Office to ensure Tasmania's Planning Policies, regional land use strategies and regulations consider the role of land use planning in emissions reduction and resilience while also considering other environmental, economic and social outcomes.*

Under priority area 3 we believe the following opportunities will have the most impact:

- *Work with the Australian Government and project proponents to support the development of new land and forestry-related methods that allow for greater participation in the ACCU Scheme*
- *Promote and explore the use of natural capital accounting frameworks for valuing ecosystem services in Tasmania.*
- *Explore opportunities to increase the uptake of bio-energy, the use of plantation forestry residues, salvage harvesting and agricultural waste streams for feedstock, and opportunities for renewable energy*
- *Continue to work with the State Planning Office to ensure Tasmania's Planning Policies, regional land use strategies and regulations consider the role of land use planning in emissions reduction and resilience*.

Under priority area 4 we believe the following opportunities will have the most impact:

- *Collaborate with key partners across state, national and local government and the private sector to increase emergency preparedness, response and recovery*.

Under priority area 5 we believe the following opportunities will have the most impact:

- *Establish a regular forum to showcase the work underway across Tasmania to reduce emissions and build resilience, provide information about emerging opportunities and risks, and encourage networking and information sharing across sectors*

Q. *Are there any priorities or future opportunities missing from this draft Plan?*

One of the key instruments of Tasmania's Forest practices system is the Forest Practices Code. The Forest Practices Code prescribes the manner in which forest practices are to be conducted so as to provide reasonable protection to the environment. The current 2020 version of the Code, apart from the reforestation requirements, has scant mention of emissions reduction measures. Most of the Code prescriptions are aimed at natural and cultural heritage and soil and water protection measures. Whilst many of these measures may have indirect positive outcomes for emissions, the Code could incorporate more specific climate and carbon protection measures or outcomes to be achieved. There is now a body of information and evidence about how to do climate smart forestry and some of this could be considered for inclusion in the next review of the Code (and potentially the Act) to provide guidance for practitioners.

Tasmania's State Policy on the *Protection of Agricultural Land (PAL) Policy 2009* requires that plantation forestry must not be established on prime agricultural land. The policy is implemented by local government authorities through their respective Local Provisions Schedule's. Given that one of the key emission reduction measures in the LULUCF sector is to increase areas under plantation, and the PAL Policy is now 15 years old, a review of PAL Policy may be another future emission reduction opportunity/action going forward.

If you have any queries on the points we have raised, please contact me.

Yours sincerely,

Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania