

Thursday, 21st December 2006

National Emissions Trading Taskforce Secretariat
The Cabinet Office
GPO Box 5341
SYDNEY NSW 2001

Dear Secretariat

Comments on “Possible Design for National Greenhouse Gas Emissions Trading Scheme”

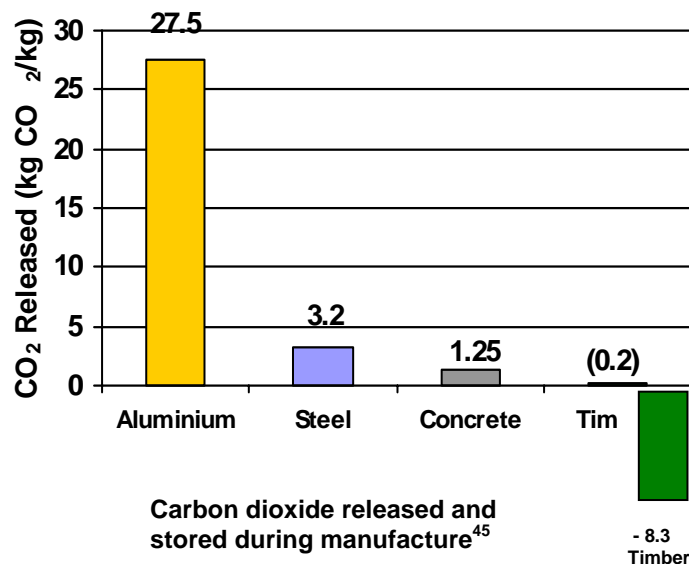
This is not a detailed submission on the Paper. Instead it attempts to set the scene for a repositioning of production forestry in terms of emissions trading. This should be in line with the intention of any such scheme to identify carbon stores to ensure they are recognised and there are fair and transparent mechanisms to optimise all opportunities to grow those carbon stores and reduce greenhouse gas emissions.

It should be read in the context of the NAFI submission, our previous submission to the Taskforce, the FWPRDC and CRC for Greenhouse Accounting Paper, “Forests, Wood and Australia’s Carbon Balance, VAFI’s Paper authored by Alastair Woodard and Boris Iskra, “The Environmental Impact of Building Materials Victorian Native Forest Timbers. All are attached.

Many of the workings of this approach require a great deal more research, thought and discussion. Resources should be committed to ensure this occurs.

Forest industries in Australia are in a unique position in relation to combating climate change and the development of the consequent policy, institutional and industry settings required.

Trees store carbon as they grow and much of that carbon remains in the manufactured wood and paper products now consumed universally as day to day and specialty products and services. Native forestry in Victoria can be seen as solar powered and organic. Wood stands alone as the only carbon positive mainstream construction material. Libraries, archives of paper and books are also carbon stores.



Ref: http://www.forest.nsw.gov.au/publication/forest_facts/forests_timber_greenhouse_effect/default.asp

Other materials, aluminium, steel and concrete embody significant amounts of energy creating significant greenhouse gas emissions, see graph above. As well, residue from forest harvesting and processing can supply heat and energy as bio-energy. Modern, properly filtered, slow combustion heating using sustainably harvested firewood is superior to all other forms of mainstream household heating in terms of greenhouse gas emissions with AGO research confirming this.

These characteristics of forestry products remain under-recognised as contributors to saving the planet from global warming/climate change. Much more recognised are the characteristics of “new” forests in terms of the **Kyoto Protocol** and most related schemes, legislation, regulations and markets at national and international levels.

What needs to be changed is the overall approach/perspective to the industry. This perspective should be from the whole of life cycle of sustainable production forestry from seeding to harvesting to wood and paper production use and re-use, perhaps in bio-energy (fuel, heating, electricity) is required. In doing so, we re-orient our overall approach and understanding of the place of forest industries in both the industrial and natural cycles in the twenty first century. This is a very different place from the present image of forests, especially production forests.

Over the past 40 years and continuing in Australia, forests/trees have been made totemic, representations of nature, helping to achieve much needed awareness of the natural cycles of the planet and a host of related environmental issues. But there needs to be some boundaries to their use as such totems or we are in grave danger of severely distorting any proper scientific understanding of the complexities involved in all the issues around the future, interactions between the industrial and natural cycles that we are part of in the 21st century. Simplistic, one dimensional anti-forestry campaigning unfortunately perpetuates this. Especially, we are distorting the environmental outcomes around the use of forests as part of these cycles. If sustainable production forestry were to cease in Australia, the environmental outcome world-wide would be negative not positive, and Australia would be importing most of its wood products from much less sustainably harvested forests.

Production forestry has much to offer in terms of positive environmental outcomes compared to nearly all other industries, including service industries and yet it is demonised more than any other. Ironically, there has been no recognition of major progress towards sustainable forestry either by environmental organisations or even some governments.

As part of this re-orientation, all forestry issues must be carefully appraised in all policies, mechanisms and markets to do with carbon. This means rethinking the Kyoto perspective and rules. It may even mean establishing a whole new series of credits/offsets, even wood and paper credits. It signals a departure from the pre-eminent view of “new” forests as additional carbon sinks to a much more thorough, perhaps more difficult assessment and integration of the various roles of production forestry across aspects of emissions trading, from design to mechanisms and operations.

VAFI believes that unless this occurs there will be major distortions in the mechanisms and market. Production forestry will be deeply disadvantaged and not expand and prosper. And so too will the planet and people be disadvantaged.

VAFI would hope to be involved in all further developments of this important system. I am available for further discussions about these issues from January 8th when our offices re-open.

Yours sincerely



Patricia J Caswell
CEO, VAFI

Attachments:

1. VAFI Brief Submission to the National Emissions Trading Taskforce
2. NAFI Submission, “Discussion Paper on a Possible Design for a National Greenhouse Gas Emissions Trading Scheme
3. FWPRDC & CRC Greenhouse Accounting, “Forests, Wood and Australia’s Carbon Balance
4. VAFI Paper, “Environmental Impact of Building Materials Victorian Native Forest Timbers