

Please attach the following **one-page summary** to your submission.

**Comments on the Interim Report for the Independent Review of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act)**

**Summary**

**Name of author/organisation:**

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**President**

**Timber Communities Australia Huon Resource Development Group**

**Date:**

28 July 2009

**Which chapter(s) of the interim report are you commenting on?**

**6 Forestry**

**8 Climate Change**

**Key points of submission**

(please identify up to three main priorities or focal points of your submission):

No need for a greenhouse trigger for forestry in that of 115 national industry sectors only forestry and logging is greenhouse positive.

The IPCC has recognised that sustainable forest management will generate the largest sustained greenhouse gas mitigation benefit.

Australia's forest operations are reported in an open and transparent manner against international criteria including the conservation of biological diversity the contribution to carbon cycles and long-term multiple socioeconomic benefits

**References**

Nabuurs, G.J.et al, 2007: Forestry. In Climate Change 2007: Mitigation. Contribution of Working Group III to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change [B. Metz, O.R. Davidson, P.R. Bosch, R. Dave, L.A. Meyer (eds)], Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

Montreal Process Implementation Group for Australia (2008). Australia's State of the Forests Report 2008. Bureau of Rural Sciences, Canberra.

Department of Climate Change 2008 The Green Paper on the Carbon Pollution Reduction Scheme, Annex D Analysis of the emissions intensity of Australian industries

**Confidentiality statement:**

Note that all submissions unless otherwise indicated will be published on this website. You MUST indicate on your submission if you wish for your submission not to be published. If you wish for your submission to not be published please mark your submission as 'Confidential'. You should note that even if your submission is not published, the title of your submission and the name of the submitting organisation or individual will be published on the web site. If you wish to not have your details published please contact the Secretariat before making a submission. Contact details from of individuals making submissions will be limited to name, suburb and State/Territory.

**Do you want this submission to be treated as confidential?**

(please state 'yes' or 'no') **no**

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**Wednesday, 29 July 2009**

**Submission to the Independent Review Report of the EPBC Act**

**Forestry and the Greenhouse trigger**

Following a close read of the relevant chapters of the Independent Review of the EPBC Act members of Timber Communities Australia's Huon Resource Development Group are at a loss to understand the need for a greenhouse trigger in relation to the EPBC act and forest operations under the RFA.

An independent analysis of Greenhouse Gas emissions of 115 national industry sectors conducted by the Centre for Integrated Sustainability Analysis (CISA), University of Sydney for the Commonwealth's Carbon Pollution Reduction scheme green paper is startling reading. This study found that only the forestry and logging industry was greenhouse positive, removing 1,493 tonnes of CO<sub>2</sub> equivalent gas for every \$ million of revenue.

The environmental credentials of forest and logging is also extolled by the UN's Intergovernmental Panel on Climate Change. The IPCC found that *"In the long term, a sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit"*

The RFA and NFPS ensure that forest operations are undertaken according to sustainable forest management principles. Forest Management is reported in an open and transparent manner against sustainability criteria. The Australia's State of the Forests report 2008 was prepared by the Montreal Process Implementation Group for Australia on behalf of the Australian, state and territory governments and documented performance against established criteria.

The criteria are:

1. Conservation of biological diversity
2. Maintenance of productive capacity of forest ecosystems
3. Maintenance of ecosystem health and vitality
4. Conservation and maintenance of soil and water resources
5. Maintenance of forest contribution to global carbon cycles
6. Maintenance and enhancement of long-term multiple socioeconomic benefits to meet the needs of societies

## 7. Legal, institutional and economic framework for forest conservation and sustainable management.

These criteria are the same as those developed by the international-level Montreal Process Working Group on Criteria and Indicators for the Conservation and Sustainable Management of Temperate and Boreal Forests, which comprises representatives of 12 governments, including the Australian Government. The national-level Montreal Process Implementation Group for Australia, which comprises representatives of the Australian, state and territory governments, devised the 44 indicators used to track progress across these criteria.

This detailed progress appears to be ignored by many of the environmental Non government organisation that made critical submissions to the Independent reviewer. It is our view that this report on behalf of all Australian governments clearly demonstrates the environmental benefits of the RFA process and makes their accreditation under the EPBC Act a very effective tool for increasing and protecting biological diversity. It is clear from the State of the Forest report that sustainable forest management has been achieved under the NFPS.

For example the report states that there are 23 million hectares Australia's native forests in formal nature conservation reserves (about 16%)

This compares to Target 1.1: At least 10% of each of the world's ecological regions effectively conserved of Convention of Biological Diversity 2010 target.

If, as argued by submitters the EPBC Act is the result of the Commonwealth signing this convention; then by exceeding the reserve target, then the EPBC Act must be met as well.

In Tasmania where discussion of the Wielangta case has dominated the independent review, forest reserved for conservation now stands at 47%, more than enough to meet the international bench mark to protect biological diversity, again a stated aim of the Act. There is no need to change the RFA or the EPBC to ensure that conservation outcomes are reported in open and transparent manner, as the State of the Forest reports demonstrates that this reporting already occurs.

Alan Duggan  
President  
TCA Huon Resource Development Group