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Dr Tom Hatton
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Dear Dr Hatton

GREENHOUSE GAS ASSESSMENT GUIDANCE

The Forest Industries Federation of WA (FIFWA) is the industry association for the timber industry in Western Australia. Our membership includes all the major companies and businesses that operate in the WA timber industry, including commercial plantation growers and managers, harvest and haulage operators, and timber processors in both the plantation and native timber industry sectors.

FIFWA, in partnership with our national equivalent, the Australian Forest Products Association (AFPA), seek to elevate consideration of our renewable forest operations as providing realistic options for storing carbon and mitigating greenhouse gas emissions.

IPCC Special Report on Climate Change and Land:

Released this month, this latest IPCC report reinforces its previous 4th assessment statement on the positive role of sustainable forestry and agro-forestry in climate change mitigation which was:

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 latest IPCC report states:

Sustainable forest management aimed at providing timber, fibre, biomass, non-timber resources and other ecosystem functions and services, can lower GHG emissions and can contribute to adaptation. B5.3.

Sustainable forest management can maintain or enhance forest carbon stocks, and can maintain forest carbon sinks, including by transferring carbon to wood products, thus addressing the issue of sink saturation... Where wood carbon is transferred to harvested wood products, these can store carbon over the long-term and can substitute for emissions-intensive materials reducing emissions in other sectors. B5.4.

Most mitigation pathways include substantial deployment of bioenergy technologies. B7.4.

The use of residues and organic waste as bioenergy feedstock can mitigate land use change pressures associated with bioenergy deployment. B3.3.

In June 2018, AFPA launched a new initiative *18 by 2030 – Forest Industries help tackle Australia's climate change challenge* which lays the foundation for how our renewable forest industries can further contribute to tackling climate change.

The central theme of the *18 by 2030* project is relevant to Western Australia and the consultation undertaken by the EPA over the draft Greenhouse Gas Assessment Guidance.

18 by 2030:

As Australia and the world ramp up efforts to reduce emissions, our renewable forest industries can play an even greater role in Australia's transition to a greener, low-carbon emission economy.

The initiative outlines how Australia's forest industries can remove an additional 18 million tonnes of CO₂ equivalent per year from 2030 (on top of the carbon already stored by our forests), with the right policy settings. In the lead up period from 2019 to 2030, 115 million tonnes of CO₂ equivalent can also be stored.

- The *18 by 2030* climate change challenge document can be found [here](#).
- AFPA's associated *18 by 2030* website with more information is [here](#).

Australia's forest plantations and managed native forests are a renewable and sustainable resource, consisting of some 2 million hectares of hardwood and softwood plantations plus around 5.5 million hectares of a sustainably managed native forest of which about half a per cent is harvested and regenerated each year.

In Western Australia, we have an estimated 360,000 ha of softwood and hardwood plantations, and around 850,000 ha of regrowth native forest available for harvest. Less than 1% of state forest is harvested in any one year.

Australia's forest industries are pledging to remove over 18 million tonnes of CO₂-e per year by 2030, by:

- **Building Block 1:** Storing carbon in new forest plantations.

- **Building Block 2:** Replanting existing forest plantations to maximise on-going carbon storage.
- **Building Block 3:** Increasing the use of wood products in the construction of new detached residential houses, multi-rise apartment and commercial buildings to offset emissions.
- **Building Block 4:** Reducing emissions from our processing and industrial facilities by being more energy efficient and using renewable bioenergy (both electricity and renewable heat) instead of fossil fuels.
- **Building Block 5:** Reducing emissions in transport by replacing fossil fuels with renewable biofuels.
- **Building Block 6:** Reducing emissions by supporting the use of sustainable biomass for cofiring in existing coal fired power stations.

This ambitious but important goal can only be achieved through the right mix of policies across all levels of government to maximise the carbon-storing and emissions reduction potential of our renewable forest industries.

Multiple benefits:

Targeting multiple-benefits as well as carbon storage from potential offset projects would facilitate a range of technology options and land-based activities which can deliver cost-effective outcomes for emissions reduction and broader economic, social and environmental outcomes.

With respect to the forestry sector, there can be considerable co-benefits in addition to carbon emissions reductions, including reduced salinity, reduced soil erosion, enhanced water quality, improved agricultural productivity, biodiversity and regional economic development and jobs.

Preference should be accorded to mitigation activities undertaken in Western Australia to ensure the multiple benefits flowing from these activities accrue for the WA community.

In conclusion, I commend to you the contribution and scope of the renewable forestry sector in responding to the challenge of mitigating greenhouse gas emissions, and would welcome any opportunity to discuss this further with you.

Yours sincerely,



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