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28 June 2011

Professor Will Steffen
Climate Commission Secretariat
GPO Box 854
CANBERRA ACT 2601

Dear Professor Steffen

Flaws and missed opportunities in the treatment of forests in Climate Commission Report: The Critical Decade

We, the undersigned forest scientists and practitioners, wish to draw your attention to what we regard as some serious flaws, omissions and lost opportunities in relation to the best approaches for using forests to reduce greenhouse gas emissions in the Climate Commission's latest report, "The Critical Decade".

We argue that there is significant potential for managed forests to contribute to a more sustainable future for our economy and society and to address climate change. However, we are deeply concerned that climate change policy will be based on assertions not supported by sound analysis or scientific evidence.

In recommending policy options, we urge you to:

- Reject the simplistic argument that the cessation of timber harvesting from Australia's native forests is necessarily the best strategy for carbon emissions mitigation;
- Accept the viewpoint of the Intergovernmental Panel on Climate Change (IPCC) and Food and Agricultural Organisation (FAO) that the sustainable management of forests, including a mixed strategy of conservation and timber production, is more likely to be optimal for carbon reduction;
- Recognise the carbon emission reduction benefits when wood from sustainably managed sources is used rather than alternatives such as metal, concrete and plastic; and
- Seek further advice from scientifically-qualified experts on forest management strategies for mitigating the impacts of climate change.

Our concerns are based on several shortcomings of the Climate Commission's report, outlined below:

Representation of forests, forestry and forests in the carbon cycle

Landscape carbon storage is important, but forms only part of the full role of forest biomass in greenhouse gas mitigation. Storing carbon in wood products, and supplying society with low-emission products for construction and renewable energy generation are also widely recognised benefits of forest management that are actively being developed in Australia and internationally. Using wood in construction dramatically reduces fossil fuel emissions when substituted for metal, concrete and plastic alternatives. Unfortunately, these benefits are not recognised by the Climate Commission's report. This is particularly concerning given the 2009 Garnaut Climate Change Review argued for the inclusion of carbon stored in wood products in climate mitigation policies and strategies and there is considerable science to support this arrangement.

An incomplete account of forest carbon storage in Australia

The section of the Commission's report dealing with forest management focuses on the tall-wet eucalypt forests. Whilst important, these forest sites with their very large carbon stocks are atypical of the greater forest landscape in Australia. Old-growth examples make up only 2% of the total forest estate and the majority are already in permanent conservation reserves. Australia's forests include a wide variety of forest and vegetation types, most with far lower C stocks, even when mature, than the relatively undisturbed old-growth tall-wet-eucalypt forests referred to in the Climate Commission report.

There are a number of important omissions from the report's treatment of forests. The first is the impact of forest clearing on carbon stocks; this has, of course, the greatest single impact of any human intervention. The second is the lack of attention to wildfire effects that are not properly recognised in the Climate Commission report. Australia's forest cannot be uniformly old due to the occurrence of wildfire. For example, in Victoria 3.5 million hectares have burned since 2003, including some of the nation's most carbon dense forests. While a significant proportion of carbon remains after fire in dead trees, these burnt forests will be net sources of carbon emissions for decades as dead wood decomposes. Increased incidence of wildfire in a changing climate is likely to prevent much of Australia's forests from reaching their potential maximum carbon storage. Thirdly, there is no exploration of possible forest management regimes that optimise the overall storage of carbon in managed forests and harvested wood products and account for avoided emissions possible when wood substitutes alternative resources. The merits of this strategy are recognised elsewhere, as noted below.

Sustainable forest management is the internationally recognised strategy

The IPCC, FAO and most forest scientists recognise that the sustainable management of forests including a mixed strategy of conservation and timber production is optimal for carbon reduction. To quote the IPCC AR4 report:

“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”.

We support the roles of afforestation recognised in the report as part of an overall sustainable forest management strategy. Reforestation for timber, biodiversity, biofuels, water quantity and quality and landscape protection are possible. Afforesting land, including agricultural

land, produces a variety of goods and services, including carbon sequestration, while generating income and other benefits for rural communities.

Potential adverse flow-on effects

The cessation of harvesting in native forests would have significant and unnecessary costs to society and the economy. It will impact adversely on the livelihoods of Australians in rural communities and result in the loss of skills, knowledge and expertise required to manage our native forests sustainably for all their values.

Given Australia's high per capita consumption and substantial imports of wood products, it is also likely that there will be significant leakage impacts on forests elsewhere, most of which are managed to lesser standards than Australia's forests. Withdrawal of more Australian native forests from management can be expected to increase greenhouse gas emissions from more intensive harvesting elsewhere, and from increased transportation of imports.

Australian forest scientists stand ready to assist in rectifying the report

The shortcomings identified above suggest greater input from experienced forest science and management professionals would be helpful to the Commission's deliberations. The signatories and Institute of Foresters of Australia would be pleased to assist the Climate Commission in its work relating to the important roles of forests in greenhouse gas mitigation.

Please contact Dr. Martin Moroni to further the discussion and identify relevant forest professionals for consultation.

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More detail can be found at:

http://www.fwpa.com.au/Resources/RD/Reports/PRC162-0910_Final_Report_Greenhouse_gas_mitigation.pdf?pn=PRC162-0910
<http://environmentaledge.com.au/>
<http://www.cei-bois.org/files/b03500-p01-84-ENG.pdf>
<http://www.fao.org/docrep/013/i1756e/i1756e00.htm>
<http://www.fao.org/docrep/012/i1580e/i1580e00.htm>
<http://www.fao.org/forestry/27314-09105bd5bd06ba33380a10c39e36ac6c1.pdf>
http://www.ipcc.ch/publications_and_data/ar4/wg3/en/tssts-ts-9-3-description-and.html
[http://www.forestry.org.au/pdf/pdf-public/policies/Statement 6.2 - Forests & Climate Change Mitigation \(approved 2003\) \(Web 6.2\).pdf](http://www.forestry.org.au/pdf/pdf-public/policies/Statement_6.2_-_Forests_&_Climate_Change_Mitigation_(approved_2003)_%28Web_6.2%29.pdf)

Yours sincerely

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FAICD: Fellow of Australian Institute of Company Directors

FIFA: Fellow of Institute of Foresters, Australia

FTSE: Fellow of the Academy of Technological Sciences and Engineering

IAWF: International Association of Wildland Fire

MAICD: Member of Australian Institute of Company Directors

MACFA: Member of Association of Consulting Foresters of Australia

MCFA: Member Commonwealth Forestry Association

MIFA: Member of the Institute of Foresters of Australia

PEFC: Programme for the Endorsement of Forest Certification

RPF: Registered Professional Forester

Copied to:

- Professor Tim Flannery, Chief Commissioner, Climate Commission, Climate Commission Secretariat.
- The Hon Greg Combet, AM, MP. Minister for Climate Change and Energy Efficiency
- The Hon. Tony Burke, MP. Minister for Environment
- Senator the Hon. Joe Ludwig, Minister for Agriculture, Fisheries and Forestry
- The Hon. John Cobb, MP. Shadow Minister for Agriculture and Food Security
- The Hon Greg Hunt, MP. Shadow Minister for Climate Action, Environment and Heritage
- Senator the Hon Richard Colbeck. Shadow Parliamentary Secretary for Forestry
- The Hon Dick Adams, MP. Chair, House of Representatives Agriculture, Resources, Fisheries & Forestry Standing Committees