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**COAG WORKING GROUP ON CLIMATE CHANGE AND WATER  
Design Options for the Expanded National Renewable Energy Target  
Scheme**

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**This submission relates to the proposal to allow “native forest biomass as an eligible fuel subject to this biomass being a harvest residue or processing waste.”**

***Extract from the options paper:***

***2.2 Eligible sources”....., the MRET allows native forest biomass as an eligible fuel subject to this biomass being a harvest residue or processing waste, with further conditions around the harvesting operation. By contrast, native forest harvesting residue is excluded under the Victorian and New South Wales schemes.”***

1. The expansion of the Mandatory Renewable Energy Target to 20% is a potentially effective way to reduce Australia’s greenhouse gas emissions by increasing the use of renewable energy.
2. However, an expansion of the scheme which is founded upon simply redefining some old or highly polluting energy sources as “renewable” will not achieve real reductions in greenhouse emissions. Worse, it may actually add to greenhouse gas emissions by exacerbating levels of forest destruction.
3. In NSW a standing live tree in a growing native forest can be classified as “waste.”
4. Generations of politicians and forestry officials have stated over 40 years that the Eden woodchipping industry uses “waste” wood; that the “timber” industry of the south east is sawlog driven with residue, “heads” and “butts” being chipped. Forestry officials and politicians, including Ministers responsible for forestry continue to make this claim today. Thus past experience tells us that policy and industry development supposedly based upon the use of native forest “waste” in reality uses anything but waste.
5. Even a cursory look at logs on trucks entering the Eden chipmill confirms that the so-called “waste” destined for chipping there is substantially whole logs, most of it from multi aged forests. See: “Half an hour at the Eden chipmill corner” <http://www.youtube.com/watch?v=0vJuZya1X00> The chipper can only process whole logs; it cannot process branches, crowns or butts. That is, it cannot process waste, and yet, forestry authorities state that its feedstock is “waste.”
6. Further, even if, in the unlikely event that genuine waste from a logging operation were collected and processed to generate energy (a labour intensive and expensive process), this would be a disaster for the long term productivity and ecological recovery of the forest. Continuing soil fertility depends on the return of nutrients from “forest waste” to the soil. In a presentation to the Bega Valley Shire Council on 8 July 2008, ForestsNSW Regional Manager Ian Barnes claimed that ForestsNSW believes that the soils of the far south coast, which are very old and low in nutrients, would support ongoing logging rotations for 400 years because logging waste is returned to the soil by decay and via post logging burns. I find this proposition very questionable, but it is completely impossible to

- believe if logging debris and waste are removed and burned. Removal and burning of logging residue deprives the soil and any wildlife surviving after the logging of nutrients and shelter which are essential if the regrowth forest is to have an economic or ecological future or become capable of reabsorbing the carbon lost in the original logging.
7. While Regional Forest Agreements assert that native forest industry is sustainable, there is mounting evidence that native forests are replacing themselves at a slower rate than they are being depleted, overwhelmingly for woodchips.
  8. Native forest biomass is not renewable, and its inclusion in MRET will certainly displace genuinely sustainable biomass, wind and solar energy.
  9. Industrial use of forest “waste” means more trees will be cut. Native forest biomass generation, including sawmill waste has the potential to further devastate native forests.
    - History tells us that whatever definition of waste is used, it will inevitably lead to additional logging. The Eden woodchipping industry was purportedly founded on “waste,” but led to the removal and chipping of an extra million tonnes a year of wood.
    - In the lead up to the proposed establishment of a charcoal and biomass plant at Mogo in 2002, thousands of trees destined to be processed as “waste” were poisoned or ringbarked by Forests NSW. The only factor that qualified these trees to be viewed as “waste” was their unsuitability to be sawlogs.
  10. Any energy generated is only as renewable as its feedstock. Industrially logged native forest is not a sustainable feedstock. Native forest logging is a massive greenhouse polluter, responsible for up to 5,000 tonnes of CO<sub>2</sub> for each hectare logged, depending on the forest type and the logging regime. For dry forests, such as we find in SE NSW it is typically up to about 1,000 tonnes per hectare. Any process which depends upon the continued industrial scale forest destruction – accounting for over 80 percent (95% in some regions) of wood taken from the native forest – cannot be viewed as renewable.
  11. Electricity from native forest biomass is not carbon neutral and may even generate more greenhouse gases than electricity generation from fossil fuels. Native forests are a vast store of carbon that has been sequestered over millennia. Most of this carbon is stored below ground or as coarse woody debris. When a native forest is logged much of this stored carbon is released. This must be taken into account when assessing the “sustainability” of native forest logging and industrial uses of its “waste” products.
  12. Wood “waste” continues to store greenhouse gases for decades if left in the forest. As woodchips/ paper it has a likely life of about 3 years. When burned for power it becomes instant carbon dioxide.