The Secretary Standing Committee on Natural Resource Management (Climate Change)
Parliament House
Macquarie St
Sydney NSW 2000

Monday, 17 December 2007
Dear Sir/Madam,

Re: Your inquiry's term of reference (c) Approaches to land and water use management practices on farms and other natural resource management practices, having regard in particular to the role of such practices in contributing to climate change or as a tool in helping to tackle climate change.

Issue 1. Wood waste eligibility for GreenPower and climate change.

1(i) The Northern Branch (The Branch) of the Institute of Foresters of Australia (IFA) is concerned that the definition for 'eligible' renewable wood wastes to contribute to the biomass resource for GreenPower is too narrow at present, being restricted to a subset of plantation-derived wood waste.

1(ii) The wood waste derived from any defined forest areas (plantation or regrowth native forest) that have been certified to the Australian Forestry Standard (AFS), or sourced from other forests managed under schemes recognised as substantially equivalent to AFS, should be eligible to contribute to GreenPower. The environmental merits of these forestry activities are covered by the AFS, ISO 14001 or other schemes. This merit is independent of whether or not the wood waste is sourced from plantation forests.

1(iii) There is an opportunity for the GreenPower accreditation program to include this broader definition of eligible wood wastes in any energy retailer's (and forest grower's) Chain of Custody (CoC) certification.

1(iv) Another eligible, renewable source of biomass for GreenPower will likely impact the biomass energy market in a positive fashion, by bringing increased competition to that market… and so help to make GreenPower a cheaper option for all.

Recommendation: The Branch encourages the NSW Government (and generally, the National GreenPower Steering Group) to review the eligibility of wood waste for GreenPower, with a view to include those wastes described in paragraph 1(ii) above. In doing so, this is not risk taking, but risk management.

Issue 2. Wood waste (residues) and its implications for wildfire management and climate change.

2(i) Wood waste (residues, in situ in any defined forest area) resulting from harvesting regrowth native forests form part of a forest floor fuel array that requires management to mitigate against the risk of catastrophic wildfire.

2(ii) It is a well accepted notion that wildfires are major contributors of greenhouse gases, regularly on a landscape scale, but occasionally in Australia at a State or even national scale.

2(ii) As these residues are embedded in a mosaic of regenerating forest stands, they pose an immediate fire risk to the growing forest by virtue of their contribution to fuel loads. This contribution is significant and often requires the application of prescribed burning activities to the forest stands. The conduct of these prescribed burns requires planning, resources, coordination and control and… appropriate weather. Where any one of these factors is limiting, prescribed burning may not occur. Here, the attendant fire risk remains uncontrolled.

2(iii) Were forest managers able to sell some of this residue as wood waste to GreenPower accredited generators, then limited resources or opportunities to conduct prescribed burning activities in the forest estate, could be more efficiently allocated or scheduled. More control could be exerted over the risk of fire in the forest estate. Even in the middle of summer, in the stranglehold of drought, residue sales in themselves would facilitate some mitigation of the fire risk.

2(iv) Any reduction in the volume of forest floor fuels that could be attendant with the sale of some residues as eligible wood waste would result in a safer workplace for those land management officers who are charged with the on-ground conduct of prescribed burning of commercial forests.

2(v) Further, attendant with the switch from forest floor fuel to eligible and actual GreenPower wood waste, is the decrease in carbon emissions resulting from either prescribed burning or from unplanned wildfires on the forest estate. The net carbon emissions sourced from commercial native forests in New South Wales must (intuitively) be reduced under this model… of some additional residue streaming to GreenPower eligible wood waste.

Recommendation: The Branch encourages the NSW Government (and generally, the National GreenPower Steering Group) to review the eligibility of wood waste for GreenPower, with a view to include those wastes described in paragraph 1(ii) above. In doing so, this is not risk taking, but risk management.

The Branch (or indeed NSW Division) would be pleased to provide any further resolution on these issues that the Committee may require.

Yours sincerely,

Nigel Fuller
Secretary
Northern Branch, NSW Division
Institute of Foresters of Australia