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28 November 2019

Climate Change Consultation
Department of Water and Environmental Regulation
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Dear Sir/Madam

CLIMATE CHANGE IN WESTERN AUSTRALIA – ISSUES PAPER

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.

In this submission, we will be responding to the questions which have pertinence to our sector.

The pivotal role of the forest industry in contributing solutions to the world's carbon dioxide emissions conundrum is perhaps best captured by this statement of the Intergovernmental Panel on Climate Change (IPCC) 4th assessment 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 (carbon) mitigation benefit.

This commentary has been bolstered by the latest IPCC report in relation to the positive role of sustainable forestry and agro-forestry in climate change mitigation:

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.

1. Transforming energy generation

- What are the most effective ways to overcome these challenges by 2030?

Co-firing existing coal fired power stations with sustainably sourced biomass is a well-accepted step on the road to a low emissions future. This strategy is widely adopted in developed, technologically advanced societies.

The State's *Djarlma Plan for the Western Australian Forestry Industry* (2019) calls for supporting "the development of local markets for ecological thinning and harvesting residues , including for bioenergy where wood fibre is unsuitable for higher value uses, to improve efficiency of resource use".

2. Industry innovation

- How can the Government of Western Australia foster clean industries and technologies?

The Government of Western Australia should recognise the unique contribution and potential of the state's forestry sector in mitigating the carbon emissions of other sectors of the state's economy.

Forestry delivers multiple-benefits beyond carbon mitigation, such as 6,000 jobs generated directly and indirectly and the \$1.4 billion annual economic contribution to Western Australia.

3. Future mobility

- How can we ensure that Western Australia isn't left behind in the transition to cleaner transportation?

Biodiesel derived from forestry & plantation residues should be part of the suite of renewable fuel options for Western Australia. Regulatory obstacles to the acceptance of this source of biodiesel should be identified and removed.

4. Regional prosperity

- What steps can we take to further enhance the resilience of our regions and our primary industries?

The timber industry is a major contributor to the social, economic and environmental fabric of Western Australia.

90% of the 6,000 direct and indirect jobs flowing from the industry, are in regional WA. In many communities, local timber businesses are the key employers, and their staff provide the backbone for local sporting clubs, community service groups and emergency services first responders.

The resilience of regional timber industry communities would be enhanced through measures which underpin investment security. This includes resisting pressure groups seeking to unwind statutory policies like the Forest Management Plan. It also includes support for strategies to mitigate the threat of wildfire through prescribed burning and mechanical fuel reduction.

- How can we support the agricultural sector to participate in the low-carbon transition?

Farmers should be encouraged to recognise the role of plantations in delivering multiple benefits, such as carbon emissions mitigation, shelter for livestock, fauna habitat, and water quality improvement. Landholders, and plantation companies and investors, should be enabled to monetise the carbon sequestration that their activities support. Regulatory barriers to investment, like the Federal Government Water Rule applying to the Carbon Farming Initiative, need to be addressed.

- What opportunities do carbon offset markets present for Western Australian land managers, including Aboriginal groups?

Carbon offset markets could and should unlock opportunities for land managers, including Aboriginal groups. In the case of the South West (Noongar) Native Title Settlement, revenue from carbon markets offer prospects for economic development outcomes for traditional owners.

For land managers, revenue from carbon offsets could tip the balance of return on investment in favour of plantation development.

- What matters should the State Government take into account in developing a strategy for carbon farming in Western Australia?

State Government policy with respect to carbon farming should align with Federal Government policy. The State Government should review and adjust policies which affect investment decisions around carbon mitigation. For example, the requirement on resource companies to rehabilitate former mine-sites to native vegetation excludes consideration of establishing softwood plantations for carbon mitigation, renewable timber production and the substantial regional employment associated.

5. Waste reduction

- What can households, businesses and government do to reduce their waste and compost more?

The State Government's prohibition of lightweight single use plastic bags has rekindled awareness of strong paper bags. At the same time, plastic drink straws are giving way to paper straws. These developments are to be encouraged.

6. Safe and healthy communities

- What are the main climate risks for your household or your community? What can be done to manage these risks?

From an industry perspective, wildfire remains an existential threat to forest resources and plantations. Declining rainfall also threatens productivity of both native forests and plantations.

Strategies to manage these risks include prescribed fuel reduction burning augmented with mechanical fuel reduction. Ecological thinning, as outlined in the State's *Djarlma Plan for the Western Australian Forestry Industry* (2019), will be a key strategy to enhance the resilience of native forest ecosystems.

Strategic collaboration including the MOU between FIFWA, DFES, DBCA and participating local governments for mutual support in planning and responding to bushfires, should be celebrated and supported.

More control and monitoring of access to native forests and plantations during high and extreme fire danger days should be implemented.

- What are your biggest concerns about Western Australia's future climate?

Refer to the responses above.

- What could be done to ensure your community is better prepared for possible climate impacts?

Refer to the responses above.

7. Water security

- What are the best management options to deal with the water security implications of climate change for our agricultural sector?

Strategic tree plantations have a proven capacity to improve water quality in catchments where rising saline groundwater is a threat. Strategic thinning has also been demonstrated to improve water yields in forested catchments.

It is noteworthy that revegetation in parts of the catchment of the Wellington Dam is a feature of the Myalup-Wellington Water for Food project. This revegetation is to address the threat to the Wellington Dam posed by rising saline groundwater.

8. Liveable towns and cities

- What are the key barriers to improved energy efficiency for our built environment?

Barriers to improved energy efficiency in our built environments include the historic tradition of Western Australians to choose brick and concrete, with considerable embedded carbon emissions, over sustainably produced renewable timber.

The State's Wood Encouragement Policy (WEP) announced with the Djarlma Plan in July 2019, is a good start in reversing the habit of concrete and steel in public building projects, and reducing the emissions intensity of our built environment.

Timber framed construction in WA appears to be disadvantaged due to anomalies in the Energy Efficiency provisions of the National Construction Code (NCC).

Forest and Wood Products Australia (FWPA) has proposed specific WA Energy Efficiency research investigating the impacts of the heating and cooling loads on timber framed construction and whether these settings are justifiable.

- What information or tools do you require to improve energy efficiency in your household or workplace?

As outlined above the accuracy and robustness of national energy efficiency standards when applied in the WA context is questionable. Thus these standards need to be thoroughly investigated and reviewed.

- What energy efficiency standards or disclosure measures do you support for our homes and offices and the appliances we use in them?

Refer to the answer above. Also when discussing "liveable towns and cities", there should be scope to include consideration of biophilia in the built environment, and the fact that timber in construction delivers proven biophilic benefits for people.

9. Resilient infrastructure and businesses

- What are the key climate risks for the primary industry or resources sectors?

Refer responses in part 6 above.

- Do you currently assess the impact of physical climate risks on your business, assets or infrastructure?

The impact of climate risk, such as wildfire as outlined above, are very much front-of-mind and subject to continued assessment.

- What are the best ways to enhance the resilience of public and private infrastructure?

Refer responses in part 6 above.

10. Protecting biodiversity

- Can existing land use and biodiversity management practices be modified to reduce vulnerability and improve resilience?

The State's *Djarlma Plan for the Western Australian Forestry Industry* (2019) provides a blueprint for sustainable forest management for the benefit of forests and the community. The Djarlma Plan highlights the fact of forest ecosystems stressed through climate change and excessive stem density in regrowth forests. The plan flags the need for thinning to boost the ecological health and resilience of forests.

- Are there opportunities for new collaborations with landholders or communities to address climate risks and improve biodiversity outcomes?

The Djarlma Plan emphasises the importance of engaging with traditional owners and the broader community in conversations around interventions like ecological thinning, mechanical fuel reduction and traditional burning practices. It should be noted there are actions underway as part of the Djarlma Plan to initiate these conversations.

11. Strengthening adaptive capacity

- Are there gaps in the availability of adaptation knowledge, climate information or skills for your community, organisation or sector? How can these be addressed?

As noted above, the State Government launched its Wood Encouragement Policy in July 2019, recognising the enormous range of benefits of choosing sustainably sourced wood for construction, over and above emissions intensive building products like steel and concrete.

This is a very welcome initiative, but it needs to be made effective throughout State government agencies, in particular for relevant procurement officials. It also should be backed-up with key information about product specifications and local timber product and services suppliers.

Conclusion

We appreciate this opportunity of responding to the *Climate Change in WA – Issues Paper*, and trust our observations help inform State Government policy development.

Yours sincerely,

[Redacted signature]

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