

Dept of Climate Change, Energy, the Environment and Water.

Native forest wood waste in the Renewable Energy Target: consultation paper.

To whom it may concern:

Thank you for the opportunity to make a submission. This submission is made on behalf of the WA Forest Alliance.

- The eligibility for wood from native forests sources must be removed from the list of renewable energy sources. Any lengthy transition process would be damaging to forests and climate – wood from native forests should be removed from the list immediately.
- Forests store and draw down huge volumes of carbon and play a vital role in our efforts to avert catastrophic climate change. Logging native forests and releasing their carbon into the atmosphere is a major cause of climate change.
- From an ecological perspective, there is no such thing as “residue” biomass in a forest ecosystem. Many studies show the negative impacts of intensification of logging on biodiversity including loss of habitat resources for threatened species such as the Southern Greater Glider and Koala.¹
- A native forest biomass industry, supported by renewable energy certificates, would create perverse incentives to log vast areas of forests under the guise of climate action.
- Forest biomass is not clean energy because burning it releases CO₂ emissions and so does not contribute to a decarbonization pathway².
- There is nothing climate friendly about burning native forest wood. In fact, biomass from native forests emits more greenhouse gas than coal per unit of energy generated.
- The emissions from burning biomass are instantaneous, but their removals from the atmosphere are not and take a long time. This means there is a significant time lag between when carbon is emitted and when it is removed and stored³.
- In 2015, Prime Minister Albanese said in Parliament, ‘Native wood waste is neither clean nor renewable. [The Abbott government...] makes it sound like it would just be the little offcuts which would be burnt, but the fact is that nothing is further from the truth.’
- We need the Prime Minister to act on this now and reinstate the Gillard-era ban on burning native forests and claiming renewable energy certificates.
- Native forest biomass threatens to become the new wood-chipping in Australia – masquerading as using the waste and becoming the major driver of logging.

- Australia is in the midst of a biodiversity and extinction crisis. We need real action, not just words for protecting habitat and wildlife. Protecting native forests protects habitat, wildlife and biodiversity. A biomass industry threatens all this and cannot be allowed to develop.

¹Brendan Mackey, David B. Lindenmayer and Heather Keith (2022). *Burning forest biomass for energy, not a source of clean energy and harmful to forest ecosystem integrity*. Griffith Climate Action Beacon Policy Discussion Paper 2/22, pp.1-8. Brisbane, Australia: Griffith University. <https://doi.org/10.25904/1912/4547>

²Ibid ³Ibid