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Submission to Senate Standing Committees on Environment and Communications

Carbon Credits (Carbon Farming Initiative) Bill 2011

8th April 2011

The Wilderness Society appreciates the opportunity to submit its views to this Senate Inquiry. This submission specifically addresses a couple of provisions in the Bill which we believe fail to give full effect to the intent to reward avoided emissions from logging forests (i.e. reduced forest degradation).

The Wilderness Society participated in the DCCEE public consultation on the Draft Bill. We are pleased that in the Bills the scheme explicitly cover native forest protection, avoided de-vegetation, reduced forest degradation, forest restoration, rangeland restoration, and reductions in emissions from savannah burning, amongst other things.

The context for our views on the CFI is to be found in the earlier submission of The Wilderness Society, which is attached to this submission.

1. Definitions

‘native forest protection project’ is defined as a project:

- (a) to remove carbon dioxide from the atmosphere by sequestering carbon in trees in one or more native forests; and
- (b) to avoid emissions of greenhouse gases attributable to the clearing or clear-felling of one or more native forests

Discussion: The definition fails in (b) to include protection from the range of emissive logging activities conducted in native forests. It is limited to avoiding clearing or clear-felling, however there are many other forms of emissive harvesting. Aggregated retention

and dispersed retention logging applied in Tasmania, for example, is only marginally less emissive than clear-felling, if at all.

Recommendation: amend (b) to read:

(b) to avoid emissions of greenhouse gases attributable to the clearing or harvesting of one or more native forests

2. Part 3: Eligible offsets projects

Division 2: Declaration of eligible offsets project

Section 27 (j)

This provides that the Administrator must not declare that the offsets project is an eligible offsets project unless the Administrator is satisfied that the project does not involve:

- (i) the clearing of native forest; or
- (ii) using material obtained as a result of the clearing or harvesting of native forest

Discussion: as in point (1) above, emissive logging activities in native forest take many forms apart from the clearing of native forest. The scheme should cover the range of such emissive activities.

Recommendation: amend (i) to read:

- (i) the clearing or harvesting of native forest

This also harmonises the provisions of (i) and (ii).