



7 August, 2022

Committee Secretary

Senate Standing Committee on Environment and Communications

PO Box 6100

Parliament House

Canberra ACT 2600

By email to ec.sen@aph.gov.au

Dear Committee,

Climate Change Bill 2022 and the Climate Change (Consequential Amendments) Bill 2022

Blue Derby Wild (BDW) welcomes the opportunity to contribute to the Inquiry into the Climate Change Bill 2022 and the Climate Change (Consequential Amendments) Bill 2022.

BDW welcomes the introduction of the Bills that will establish greenhouse gas emissions reduction targets in law. We note that the Bills propose to enshrine targets of reducing Australia's net greenhouse gas emissions to 43% below 2005 levels by 2030 which we support as a starting point, a floor if you will, and to net zero by 2050 at the least. In addition, the Bills include requirements for annual statements by the Minister for Climate Change to Parliament on progress towards targets, and a role for the Climate Change Authority in providing advice to the Minister on annual statements, future targets and updated Nationally Determined Contributions under the Paris Agreement.

BDW advocates for science-based enforceable emissions reduction targets to be established in law, and this Bill is an important first step.

However, the critical task of tackling climate change may begin, but does not end, with legislating targets. The targets are a starting point, a floor if you will, that will need to be strengthened in line with the evolving science on climate change and be designed to activate the range of necessary reforms and rapid transitions needed to reduce the risks and impacts of accelerating climate change to set us on a path that allows a functioning ecosystem and society.

The Bills before the Senate are an important first step, however, the Australian Government and Parliament must clarify, with urgency, the next steps that will be taken to ensure that the targets are sufficient, meaningful and will be effectively achieved. Action and timeframes for achieving net zero must be linked to the temperature goal of limiting the increase to 1.5°C. This requires science-based enforceable targets, strengthened emissions reduction mechanisms, protecting existing nature-based solutions in carbon storage and sequestration such as native forests, and specific duties and accountability in law. This needs clear processes for the targets to be increased in line with the best available science in a rapid timeframe that will limit warming to 1.5°C. The current trajectory of temperature rise predicted by the IPCC puts our natural systems, such as Gondwana forests and the Great Barrier Reef, in serious peril for long term survival as we know them.

The science is clear that Australia needs to reduce greenhouse gas emissions by 74% of 2005 levels by 2030 and achieve net zero by 2035. Australia needs to be planning our carbon drawdown opportunities, and how protecting and utilising our carbon rich native forests is part of that carbon drawdown and storage approach. [Analysis in Tasmania](#) revealed that mature wet eucalyptus regnan forests can store up to 1,200 tonnes of carbon per hectare but the same forest ecosystem logged on an 80 year rotation contains an average of 400 tonnes of carbon per hectare¹. There is the need to highlight the carbon sequestration and storage values of these forests in light of misrepresentations from the likes of Tasmania Liberal MP Felix Ellis who falsely claimed in June 2022 that “old-growth forests are actually net carbon emitters” and “the best carbon sequestration comes from a young growing forest”. The RMIT ABC Fact Check labeled Ellis’s claims as “incorrect”²

¹ Dean, Christopher., Roxburgh, Stephen., Mackey, Brendan. (2003). ‘Growth Modelling of Eucalyptus regnans for Carbon Accounting at the Landscape Scale.’ In Amaro, A. et al (eds) Modelling Forest Systems’. Pp 27-40.

² RMIT ABC Fact Check. (2022). ‘Tasmanian Liberals say younger forests are better at sequestering carbon than old-growth forests. The science says otherwise.’ ABC News. July 1, 2022. Retrieved from: <https://www.abc.net.au/news/2022-07-01/checkmate-old-growth-forest-net-carbon-emitter-felix-ellis/101199710>

Protecting our native forests which hold approximately 80% of our biodiversity will provide the additional benefit of taking action on Australia's woeful record of extinction and biodiversity loss. More than 1,400 forest-dwelling plants and animals are listed as threatened species under Australian law.³ Following the devastating bushfires of 2019/20, it is even more critical that native forests are allowed to recover and not burnt for electricity. In New South Wales alone, the prospects of long-term survival of over 450 threatened plant species and 293 threatened animal species were impacted by the Black Summer bushfires, according to the 2021 NSW State of the Environment Report.⁴

Australia currently has over 80 pieces of legislation relating to energy and various elements of climate policy, which when assessed for their effectiveness do not equal an effective legal framework to achieve what is needed. The urgent need is for a national Climate Act to set the path to net zero, define responsibilities, activate transition and incentivise innovation in meeting our targets to stay within a carbon budget that will limit warming to 1.5°C.

In addition to the considerations of the Climate Change (Consequential Amendments) Bill 2022 BDW points to the urgent need to ensure that native forest bioenergy is not included in any future renewable energy sectors. Specifically, that biomass from native forests are not considered as part of Australia's renewable energy mix in future legislative approaches to climate change and a rapid transition to a renewable energy powered future.

Our key recommendations to the government regarding bioenergy include:

- Exclude native forest biomass as a renewable energy source under the Renewable Energy Act and its successors.**
- Remove all government subsidies for native forest logging.**
- Remove all government funding for timber innovation hubs from the 2022 budget.**

The Climate Change (Consequential Amendments) Bill 2022 makes consequential amendments to include reference to Australia's greenhouse gas emissions reduction targets and/or the Paris Agreement in 14 pieces of legislation. This is an important first step and is worthy of support to build a science based approach that will work to science based targets. BDW supports further and more specific integration of climate considerations and specific requirements into a broader range of legislation with the specific example of the Environment Protection & Biodiversity Conservation Act 1999 - to ensure an effective and comprehensive whole of government/whole of economy approach to meeting targets.

³ Taylor, Chris & Lindenmayer, David. (2019). 'The adequacy of Victoria's protected areas for conserving its forest-dependent fauna.' *Austral Ecology* 44(6). Pp. 1076-1091.

⁴ NSW Environment Protection Authority. (2021). 'NSW State of the Environment 2021'. NSW Environment Protection Authority. Retrieved from: https://www.soe.epa.nsw.gov.au/sites/default/files/2022-02/21p3448-nsw-state-of-the-environment-2021_0.pdf

There are many innovative and necessary solutions to the climate crisis and establishing strong and comprehensive national climate law is the foundation for success. We support the recommendations the Environmental Defenders Office (EDO) has developed in the Roadmap for Climate Reform that identifies 5 opportunities for action and makes 58 recommendations for the reform of Australian climate law. These recommendations are designed to be acted upon in the first term of the new Australian parliament and are summarised by the EDO as follows:

Opportunity 1: Climate Act now

Opportunity 2: Provide clarity and certainty for business and community by charting a path to real net zero

Opportunity 3: Define leadership and responsibility for meeting targets

Opportunity 4: Incentivise innovation and galvanise our energy transition

Opportunity 5: Plan for and measure success

I welcome the chance to provide this submission on the Climate Change Bill 2022 and the Consequential Amendments 2022 on behalf of BDW, should you wish to discuss the submission further I can be contacted on the details below.

Yours sincerely,

Louise Morris



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