

## SUBMISSION TO THE INQUIRY INTO THE IMPLEMENTATION, OPERATION AND ADMINISTRATION OF THE LEGISLATION UNDERPINNING CARBON SINK FORESTS.

On behalf of Still Wild Still Threatened, I would like to thank you for the opportunity to provide some feedback into the implementation, operation and administration of the legislation underpinning carbon sink forests. Still Wild Still Threatened is a Tasmanian community group campaigning for the protection of Tasmania's old growth and high conservation value forests and for the creation of an equitable and environmentally sustainable forestry industry in Tasmania. We would like to bring to your attention a number of critical concerns regarding the legislation as it exists in its current form.

Over recent years, scientists have amassed an extensive body of evidence showing that the conversion of mature native forest to plantation or to a forested landscape populated by juvenile trees results in significant losses of carbon to the atmosphere. We believe that the act should be primarily concerned with the protection and restoration of Australia's existing carbon stores as found in our native forests, savannahs and woodlands.

Additionally, there appears to be no incentives present in the current legislation for the establishment of anything other than a monoculture plantation. This flies in the face of an irrefutable body of scientific evidence showing that forested ecosystems containing high levels of biodiversity are more effective in their absorption and storage of carbon than an even aged plantation containing minimal biodiversity. We would recommend that any incentives to establish trees as carbon sinks contain the proviso that the resulting forest must be established as a highly biodiverse ecosystem comprising different native tree species as well as a diversity of other native vegetation types.

We would also strongly recommend that this scheme contain a requirement that any forest established

must remain in the ground, irrespective of changes in ownership. If the forest is cleared or logged, then

the financial incentive must be paid back. The current legislation completely fails to address this crucial

issue. A forest must reach maturity to be able to store significant quantities of carbon and the legislation

must ensure this fundamental element if it is to be at all effective in achieving solid environmental

outcomes that address climate change in a real, rather than farcical, manner. In addition, we would urge

you to implement a requirement in the legislation that hydrological assessments must be carried out in

any areas of new forest or plantation that this legislation will be applicable to.

We are outraged by some elements of the legislation (in its current form) which effectively appear to be

providing our nations largest and most affluent polluters – for example, the coal industry, aluminium

and cement companies etc. – with an easy way out of taking real action on emissions reduction and

would strongly urge you to take steps to address this fundamentally problematic issue.

Thank you again for providing us with the opportunity for comment on this inquiry. Could you please

provide us with an acknowledgment of this submission.

Best regards,

Ula Majewski

On behalf of Still Wild Still Threatened

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