

26th September 2006

Climate Change Adaptation Framework
Australian Greenhouse Office
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Re: Comments on the Draft National Climate Change Adaptation Framework – Aug 2006

The Victorian Association of Forest Industries (VAFI) strongly supports the Council of Australian Governments Climate Change Group's "Adaptation" initiative and its efforts in preparing now for a changing future climate. We welcome the invitation to provide early feedback on the draft document. VAFI, has been, and continues to be, a strong advocate for serious long term climate change projects. Being the peak group for native forest production in Victoria we clearly understand the importance and benefits that sustainable forestry can provide to mitigating the effects of CO₂ emissions and their impact on future climate change.

VAFI fully supports the framework's aim to identify ways that the governments might work with business and the community to develop and 'mainstream' strategies to manage impacts and to realise opportunities. We fully agree that while impacts and adaptation responses might vary across regions, there will be common issues and significant benefits in developing tools, knowledge, approaches and expertise that can be shared nationally.

VAFI is very keen to assist in achieving this end, particularly with advice and guidance on:

- the benefits of production forestry in absorbing atmospheric CO₂ and delivering ecosystem services,
- the positive impact of long term storage of carbon in wood products or permanently in landfill geo-sequestration,
- the use of renewable wood biomass for energy generation, replacing non-renewable high CO₂ emitting fossil fuels, and
- the need for the best managed production and protected forests and the downsides if protected forests are not just as well managed as production forests.

In terms of the draft submission we provide the following comments.

Goal

Collaboration between governments, industry and the community in formulating and implementing actions is key to the success of this initiative. This collaboration must be

- open and objective, not feigned or politically motivated;
- robust, based on science not assertion; and
- timely, if actions are to be implemented over the next 5 years.

We would also suggest that perhaps short, medium and long term strategic timelines be used 10, 30 50 years say respectively with a formal performance feedback loop supporting the proposed 'learning by doing' approach.

Principles

The suggested underpinning principles appear to be workable and achievable.

Roles and Responsibilities

Our ability to respond to climate change is absolutely linked to the decisions made now and ultimate success is directly linked to the key goal of collaboration between all three levels of government, industry and the community. Success will only be achieved by complimentary actions and activities from all sectors and VAFI welcomes the opportunity to develop partnership initiatives with government to this end.

Strategies and Actions – Forestry (Priority Area 2.4)

As the draft report rightly states, “*the forestry industry is in the unique position of not only being affected by climate change, but importantly offering a method of doing something about it via carbon sequestration*”. The draft report identifies that the “interventions that the forest industry needs to consider to manage climate change are not well understood”, this has been borne out through recent discussions with many government departments who are yet to fully understand and appreciate the value of forestry and wood products in assisting with climate change mitigation. VAFI therefore fully endorses the suggestion to establish a Climate Change and Forestry Action Plan that would include:

- assessment of implications of climate change for native and plantation forests used for timber production;
- analysis of the implications of climate change for the capacity of forest systems to sequester carbon; and
- development of adaptation options in collaboration with forest growers.

VAFI also believes this action plan should also include the analysis and assessment of:

- the contribution of long term storage of carbon in wood products or permanently in landfill geo-sequestration;
- the use of renewable wood biomass for energy generation, replacing non-renewable high CO₂ emitting fossil fuels; and
- the possible negative biodiversity impacts of poor forest management (ie, the rise of illegally imported timber products) and reservation practices (with less intensive management the rise of invasive species, pest, diseases, bushfires, etc) - links to priority area 2.37 *Biodiversity*;
- the impact of new government environmental regulations, particularly how they treat greenhouse friendly materials and the need for a full life cycle approach to materials assessment - links to priority area 2.7 *Settlements and Infrastructure & design rating tools*;

VAFI would be very keen to participate further in the development of this National Climate Change Adaptation Framework and would certainly be open to assisting in providing technical expertise on forestry and timber related issues to the appropriate framework development committees. If we can be of further assistance please do not hesitate to contact us.

Yours sincerely



Patricia J. Caswell
CEO