

20 October 2022

Project Manager
Native Forest Biomass in the Renewable Energy Target
Department of Climate Change, Energy, the Environment and Water

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Consultation - Native Forest Biomass in the Renewable Energy Target

Thank you for the opportunity to provide feedback regarding potential amendments to the eligibility of electricity generated from native forest wood waste in the Renewable Energy Target.

PFT is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2022-25](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

PFT have reviewed the consultation paper and associated documents and provide responses to each of the consultation questions below.

Consultation questions

i. Should the eligibility of native forest biomass be removed?

No. The use of native forest biomass for energy generation is a legitimate activity provided the appropriate controls are in place. Section 17 of the *Renewable Energy (Electricity) Act 2000* and Regulation 8(2) and 9(1)(c) of the *Renewable Energy (Electricity) Regulations 2001* provide those necessary controls. The use of native forest biomass, as a by-product or waste product of a harvesting operation, provides a much needed opportunity to add value to the native forest industry and contribute to reducing global CO₂e emissions by offering alternatives to fossil fuels. Residues from native forest harvesting continue to remain an under used resource.

ii. If it should be retained, do the REE Regulations adequately ensure, and provide the public confidence, that electricity generation from native forest biomass is from ecologically sustainable sources?

Yes. The Regulations are adequate. The consultation paper states that since 2001 there has only been one power station in Australia that is accredited to use native forest biomass (out of a total of 2000 power stations accredited under the RET scheme). In that time only one single Large-scale Generation Certificate has been claimed for native forest biomass (out of a total of 33 million certificates claimed each and every year). This highlights the tiny scale to which native forest biomass is utilised for electricity production and the overly alarmist nature of the claims that the current regulations lead to an intensification of logging of native forests. In the

iii. If it should be retained, how could the REE Regulations be amended to provide greater certainty and public confidence that native forest biomass comes from ecologically sustainable sources?

PFT does not think the Regulations need to be amended. However, if the Regulator believed greater certainty was required then forest management certification under Responsible Wood' s Australian Forestry Standard or Forest Stewardship Council should be more than sufficient.

- iv. *Are there proposals for new native forest biomass power stations that are likely to be eligible under the RET and have potential adverse impacts?*

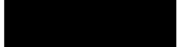
There are currently no Tasmanian power stations accredited to produce electricity from native forest biomass under the RET scheme and PFT is not aware of any proposals to do so.

- v. *If the Government removes the eligibility of native forest biomass under the RET, what transitional provisions could provide appropriate support to affected registered power stations?*

Nil response to this question

If you have any queries on the points we have raised, please contact me on 03 6165 4070 or Murray Root, Policy & Data Officer on 03 6165 4072.

Yours sincerely,



Penny Wells

CEO Private Forests Tasmania