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Renewables, Climate and Future Industries Tasmania,
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Consultation – Independent Review of the Climate Change (State Action) Act 2008

Thank you for the opportunity to provide input on the above review. PFT participated in the Business and Industry workshop on 7 August 2025 and has read the published Discussion paper and other supporting documents on the ReCFIT website.

Tasmania has a unique emissions profile amongst other Australian jurisdictions. This is due in large part to the carbon taken up and stored in Tasmania's sustainably managed forests, alongside the State's historic investment in renewable energy generation.

Tasmania has 3.3 million hectares of forest, one third of which is the private forest estate. Private Forests Tasmania (PFT) works to facilitate and expand the sustainable growth and development of the timber resource within Tasmania's private forest estate. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our Corporate Plan 2025-28 one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

Given the key role forests play in the carbon cycle, sustainable forest management has long been recognised as one of the solutions to climate change. The IPCC has stated that '*sustainable forest management aimed at providing timber, fibre, biomass, non-timber resources and other ecosystem functions and services, can lower GHG emissions and can contribute to adaptation*'[1].

Sustainable forest management ensures that the productive capacity of the forest is maintained over time. This means biomass removals do not exceed forest growth. Trees take up atmospheric carbon dioxide and store it in their biomass, both above and below ground. Approximately 50% of a tree's dry weight is carbon. The trees grow more vigorously and sequester carbon at higher rates when they are young, increasing in biomass and therefore carbon storage. Carbon sequestration rates decline as the tree matures and begins to decay.

Forests managed for sustainable wood production take advantage of this natural cycle. After growth rates have peaked, trees are harvested from these forests and converted into wood-based products. For solid wood products, the carbon can continue to be stored for decades or even hundreds of years until they are re-used, re-purposed or disposed of in landfill. Even in landfill, wood products will remain as a very long-term carbon store. For pulp wood products, most will be recycled, disposed of in landfill or burnt but will generally have a shorter carbon storage life.

The harvested trees are then re-grown and the cycle starts again. Regenerating and regrowing harvested production forests is a requirement of Tasmania's forest practices system. Given their ability to store carbon in standing trees and long-lasting wood products, sustainably harvested native forests can surpass the carbon storage benefits provided by conserved native forests over the long term[2].

The carbon benefits of sustainable forest management can also be counted in the substitution effects whereby wood products are used in place of more emission intensive products like steel, aluminium, concrete or plastic. On average, the production of a cubic metre of wood creates around 1.1 tonnes less CO2 emissions than the production of an equivalent amount of steel, concrete or plastics. This amount, coupled to the 0.9 tonne of CO2 stored in the wood, means that every cubic metre of wood substituting for fossil fuel-intensive materials saves a total of approximately 2 tonnes of CO2[3]. Again, the IPCC states '*where wood carbon is transferred to harvested wood products, these can store carbon over the long-term and can substitute for emissions-intensive materials reducing emissions in other sectors'*[1].

The carbon benefits of using wood for building and construction projects was acknowledged by the Australian Government at COP28 in Dubai. Australia, with 16 other countries, committed to advancing policies and approaches that support low carbon construction by increasing the use of wood from sustainably managed forests in the built environment. The *Tasmanian Wood Encouragement Policy,* one of the first policies of its kind in Australia, is such an approach. Using locally sourced timber not only benefits our local economy, it avoids the risk associated with imported timber of increased GHG emissions and poor biodiversity outcomes, as the imported timbers are often sourced from countries with less environmental regulations than Australia.

The forest industry also provides the skills and equipment to fight bushfires and manage outbreaks of pests and diseases. Therefore, active forest management plays a role in reducing susceptibility to bushfires, pests, and disease, which in turn leads to climate benefits. These other benefits from having a well-resourced forest management sector, with income from wood production to help offset forest management costs and fire-fighting capability, for example, are often overlooked in terms of their contribution to climate change mitigation opportunities[4].

Regarding the consultation questions posed in the Discussion paper, PFT can provide the following responses.

Question 3. What further action, if any, should be taken to reduce the impacts of climate change in Tasmania?

Investment in fire management - Given the significant role Tasmania's forests have in our carbon emissions profile, there could be specific provisions introduced to protect our forests. Wildfire looms as the greatest threat to forest carbon stocks as the changing climate increases the frequency and severity of wildfires. For example, the 2019–20 black summer fires across mainland Australia released about twice Australia's total annual anthropogenic GHG emissions in one single event. Furthermore, climate change is likely to have a direct impact on forest health by negatively impacting forest regeneration, regrowth and tree survival. The current assumption, which is built into our national carbon accounting models, is that forests will naturally regrow back to their original extent and store the same amount of carbon. In future this may not be the case as repeat bushfires burning through regrowth too young to self-regenerate may change forest landscapes forever.

Adaptive management, investment in fire prevention, and landscape-scale planning will be essential. There are now innovative fire detection and suppression technologies being rolled out and an increased use of low intensity Aboriginal cultural burning practices. Ecological thinning of forests to increase resilience is being researched. All these adaptations need further support and development.

Investment in carbon and emissions literacy – There is considerable confusion in the community regarding Tasmania's carbon emissions, sources and sinks. While many will understand the significant role that hydro and wind power make to our emissions profile in the energy sector, the role played by forests and forestry in the LULUCF sector is less well understood. For example, the term 'deforestation' has different meanings to different people and the misuse and misinformation about this term (and others) only adds to the confusion. Efforts to improve carbon and emissions literacy, specifically in the LULUCF sector, will improve understanding around the dynamics of forest carbon and the types of forest management approaches that can help drive informed climate policy and action.

If you have any queries on the points we have raised, please contact me on [redacted] or our Policy & Data Officer Murray Root on [redacted].

Yours sincerely,

[redacted]

Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania

References

[1]*Climate Change and Land - Special Report. Summary for Policymakers.* Inter-governmental Panel on Climate Change (IPCC), 2019.

[2]*Carbon stocks and flows in native forests and harvested wood products in SE Australia. Forest & Wood Products Australia.* Ximenes, F. et al. 2016.

[3]*The Role of Wood Products in Zero Carbon Buildings*. Forest and Wood Products Australia Limited, 2023.4

[4]*Forests, Plantations, Wood Products & Australia's Carbon Balance*. Forest and Wood Products Australia Limited, 2023.