

## Submission to the VEAC of the use of public land

### Public land with native forest being used for carbon storage vs. biomass for electricity generation

- **We believe any proposed harvesting of native forests biomass on public land to generate electricity, or to make furnace pellets for export is not a sustainable use of our public land. We oppose the exploitation of our public land native forests to be used as fuel for electricity generating for the follow rationale and reasons.**

Any ventures of this type will need access to public land to obtain the large volumes of biomass for fuel. We believe it is not possible to ignore the past mistakes of the woodchipping industry. The same industry now seeks to exploit the same public land and native forests to replace the woodchipping industry by turning forests into furnace fuel.

Any ventures of this type will need access to public land to obtain the large volumes of biomass for fuel. We believe it is not possible to ignore the past mistakes of the woodchipping industry that now seek to exploit the same public land and native forests to replace the failed woodchipping industry by turning to biomass for furnace fuel.

To sustain the native forest biomass harvesting needed to support an electricity generation industry, large concessions to public lands and massive public subsidies will need to be obtained. The export of biomass pellets for burning or the burning of biomass for local electricity generation will never be competitive unless native forest resources on public lands are made available at a very cheap monetary cost or, more likely, a negative cost via subsidies. This model will leave the public to pay the costs of damage to public infrastructure and biodiversity loss, and the CO2 emissions from this industrial process.

There is a growing demand in the Asian region for cheap fuel to burn in power plants. This gives an incentive to Victorian forest industries to provide the resource for export. The current situation points to this being the most immediate market and one which is trying to replace the recently failed export woodchip industry. If Victorian public lands become the source of cheap fuel for generation plants this market demand could be difficult to curtail. As with woodchipping, biomass fuel can only intensify the industrialisation of native forest management beyond the current practices and cause irreversible damage to our forest ecosystems.

The industry promoting burning forests biomass for electricity generation's definition of 'waste' is a key point and still remains without an adequate answer. Trees cut for pulp-logs for paper production are considered 'waste' even when they comprise most of the logs taken from our public land. We should not go on repeating the mistakes of the past 50 years by subsidising and supporting a biomass fuel industry based on the same distorted definition of waste.

Wood-fired generators are very inefficient and require very large volumes of biomass fuel to produce small amounts of energy. Existing forest-based biomass power plants in the USA emit at least 50 per cent more CO<sub>2</sub> than coal, for the same energy produced. The 70MW Laidlaw plant in New Hampshire, USA burns 113 tons of wood an hour. Such demands for biomass fuel from our public land cannot be met by the 'waste' materials and residues.

Greenhouse gas emissions created by forest logging on our public lands include the loss of soil carbon, the CO<sub>2</sub> output in the regeneration burns, emissions involved in transporting the materials from forests to processors then to generators and the emissions created by processing logs to pellets suitable for a furnace. The additional CO<sub>2</sub> the trees would have absorbed if left to grow should also be part of calculations. Recapturing this carbon loss by regenerating the logged forest ecosystems will take hundreds of years. This is far longer than the period in which we need to address the serious problem CO<sub>2</sub> emissions and of climate change or mitigation solutions.

Native forests are and will be a critical component in helping to mitigate climate change and therefore should be protected and restored as an effective carbon capture and storage tool.

We believe offering Renewable Energy Certificates to biomass burners or exporters would rob credits and therefore financial assistance from other true clean green energy alternatives. Energy-related subsidies should be spent on measures that reduce carbon emissions and overall energy use, and on genuinely low carbon and sustainable forms or renewable energy.

Using Victoria's public land and native forests as fuel at an industrial scale would have long term impacts, ecologically, economically and socially and would be counter-productive to reducing Victoria and Australia's CO<sub>2</sub> levels. We believe at the very least a public inquiry is needed into whether using native forests on public land for electricity generation will help reduce CO<sub>2</sub> emissions as is being stated by the biomass for fuel industry rationale.

- We ask VEAC to consider these points carefully and investigate whether the use of Victoria's forested public land will have a far greater public benefit being managed for the public health and economic values as carbon capture and carbon storage sinks to help mitigate climate change, and protect our biodiversity heritage from climate change stress.

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Other concerns we have on Public Land are:-

- Introduction of sustainable land management, with the equal recognition given to the natural values of the ecosystems' on them e.g. water

production, carbon storage, biodiversity protection, soil stabilisation public health and recreation values.

- Triple bottom line accounting for governments managing public land as well as companies using public land.
- The public should be given third party rights and resourced to legally challenge any development proposals on public land.
- Fauna and Flora surveys should be conducted on all public land development proposals; this should be applied to extractive industries wishing to exploit resources on public land.

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On Behalf of Glen Eira Environment Group Inc.

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