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The Secretary,
Senate Standing Committee Rural & Regional Affairs & Transport,
PO Box 6100,
Parliament House,
Canberra ACT 2600

31st July 2008

Re: Inquiry into the Implementation, Operation and Administration of the Legislation Underpinning Carbon Sink Forests

Thank you for the opportunity comment on this important issue.

It is encouraging to see some recognition of the value of forest and land-based mitigation measures. However, the proposed legislation fails to capitalise on the best available means for carbon sequestration in biological systems and has the potential to impose perverse outcomes on regional communities and ecosystems.

The Huon Valley Environment does not support the proposed legislation in its current form.

We strongly advocate for the inquiry to investigate the full range of options for storing carbon in terrestrial ecosystems. This includes consideration of the comparative benefits of protecting existing carbon-dense native forest or establishing new "forests".

We believe that far better outcomes, in terms of carbon storage, cost-effectiveness, benefits to regional communities and ecosystem health, will accrue as a result of a more holistic approach which provides incentives to better manage, conserve and maintain the very significant carbon stocks present in existing native forests, as well as planting new forests. Please find attached a letter that outlines Tasmanian NGOs position on the management of native forests for climate change mitigation.

It is well known and scientifically proven that young forests and plantations represent a very small carbon store compared to existing and mature native forests. The capacity of managed plantations and new forests to "soak up" carbon is very small when compared to the capacity of diverse, healthy native forests.

When there are no guarantees that proposed "carbon sink" forests will have any kind of permanence, or even requirements to include a diverse range of native species, then the carbon storage benefits of these forests (compared to native forests) is even more questionable.

It seems nonsensical to offer significant incentives to a land-use measure that offers relatively small carbon storage benefits, when the potential benefits of other land-based measures are not even being considered.

Providing an incentive to grow and maintain new forests for their carbon value may also place perverse pressure on native forests. If their is a further incentive to retain carbon stocks in "new" forests, yet no comparable incentive to retain carbon in existing and "old" forests, then their may be a greater incentive to harvest native forests, rather than plantations, leading to even worse carbon storage outcomes.

The development of measures to store biocarbon in terrestrial ecosystems requires a much more considered approach that encompasses a diverse range of factors.

We strongly urge the inquiry to consider the full range of options and critically examine the proposed legislation.

Yours Sincerely, Will Mooney

On behalf of the Huon Valley Environment Centre