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Attendance Report from United Nations Climate Change Conference Warsaw 2013: Conference of the Kyoto Agreement Parties (COP19)

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Attendance Report from United Nations Climate Change Conference Warsaw 2013: Conference of the Kyoto Agreement Parties (COP19)

Prepared for

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FWPA/ AFPA funding agreement

Report by Mr Ross Hampton, Chief Executive Officer of the Australian Forest Products Association (AFPA), covering engagements, activities and recommendations for industry and stakeholders, arising from the nineteenth meeting of the United Nations Conference Of the Kyoto Agreement Parties (COP 19), held in Warsaw, Poland during November 2013.



Background and rationale

In 2012 AFPA released a guiding vision document for the trees wood and paper industries of Australia: “A Renewable Future”.

The opening paragraph of that document says;

“Australia is looking for new solutions to curb carbon emissions and to enable the transition of the economy to a renewable and sustainable future. In many ways the forest wood and paper products industries are well placed to assist the transition of the Australian economy to this sustainable, lower emissions future.”

The Renewable Future document defines eight key priorities for Government and industry to achieve to reinvigorate a vibrant, profitable and sustainable forest products industry in Australia. The second of those eight priorities can be summarised as, ‘deliver a policy and regulatory environment which recognises the vital (and unmatched in a competitive sense), role our industries can play in a carbon constrained global economy’.

In a world of increasing populations, declining resources and a growing determination by many national Governments (including Australia’s) to move to a lower carbon economy, wood and everything made from trees should attract a market premium as a truly renewable, recyclable resource which actually stores carbon.

However neither policy settings nor consumer demand reflect this reality.

AFPAs' Vision is to "have the most profound and positive impact on the economic participation and public opinion of the forest, wood and paper products industry.'

A core activity arising from our Vision is to drive hard towards greater public understanding of the role of our industries as carbon 'champions', and to prompt the enabling adjustments to policy settings at a national level.

AFPA's request for FWPA support to attend the annual climate change talks, held under the auspices of the United Nations, can be seen in this context.

Since they commenced in 1992, the 'Conference of the Parties' United Nations talks are the annual forum for multi-country discussions and decisions regarding global activity to reduce or slow greenhouse gas emissions.

Each year a different country hosts the talks. In 2013 the host was Poland and the location was Warsaw. Ministers or delegates represented some 190 countries. About 9000 people attended in total. There are a vast array of stalls encircling the main event allowing the many groups which have aligned themselves to the COP processes, to display their information kits and causes. It could be observed that, whilst most of the mainstream eNGOs had a 'booth', the same could not be said for industry bodies or major economic contributors.



After winning the 2013 election the Abbott Government instituted new arrangements covering international climate change negotiations. This area of responsibility was moved from the Minister for the Environment to the Minister for Foreign Affairs.

The Australian Government announced that it would not send the Minister for Foreign Affairs, or a nominee, to lead the delegation as federal Parliament was sitting and other travel took precedence. In the lead up to the COP, Prime Minister Tony Abbott remarked that he was troubled that some of the Climate talks processes was, in effect, 'socialism masquerading as environmentalism.'

The Abbott Government, one could surmise, is likely to be cautious in its views regarding various emerging propositions (including REDD+ which I shall come to shortly), which require developed nations to pay greater contributions for climate action or mitigation in developing nations.

The COP19 as part of an AFPA campaign

AFPA attendance at the COP19 can be seen as part of larger campaign.

Specifically in relation to the Warsaw trip AFPA produced a range of materials to try to drive as much value as possible from the investment in time and resources. These included (attached):

1. Media Release – Forest Industry calls for Carbon Tax abolition before global talks
2. Ross Hampton newspaper Opinion Piece – “Going to the COP to shout ‘Fire!’
3. Submission to the Australian Minister for Foreign Affairs and COP19 negotiating team – and letter to Minister for Foreign Affairs
4. Sustainable Forest Management Fact Sheet – submission to the Global Landscapes Forum

The Global Landscapes Forum, Warsaw University 16/17 November, 2013

Background:

In previous years Forestry specific discussion and Agriculture specific discussion have been accommodated in separate side events during the COP. In 2013 Forestry and Agriculture were joined together under a single two-day event; ‘The Global Landscapes Forum’, held at the University of Warsaw.

The event consisted of plenary sessions and parallel break out sessions.



Ross Hampton contributing to a discussion on bio-energy; Global Landscapes Forum, Warsaw

The overall theme of the Global Landscapes Forum was; ‘Shaping the climate and development agenda for forests and agriculture.’

Observations:

Although the various presentations were ostensibly country neutral; 'Managing landscapes for food, fibre, fuel and forests', or, 'Certifying eco-system services in forestry and agriculture' for example, it quickly became apparent that this was essentially a 'development' event focused on emerging economies.

It was noteworthy that the Australian Government (AusAID) was listed as a donor/ sponsor, and yet the program received little or no publicity or promotion in Australia via industry channels or the Department of Agriculture. It was perhaps promoted to AusAID's own, development focused, constituency.



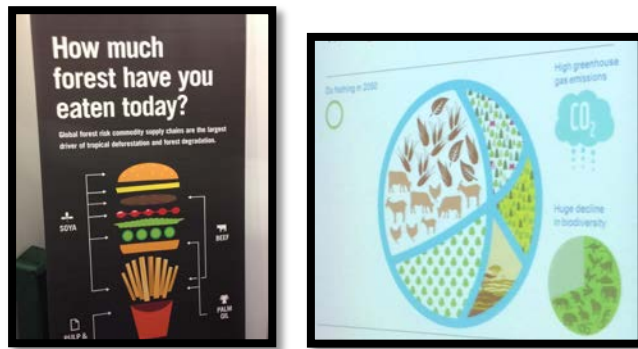
Global Landscapes Forum, Warsaw; sponsored by AusAID

The impact of this narrow development focus, in the author's view, was to skew what were potentially valuable plenaries and side events (at least based on the titles and speakers), largely into a narrow, well trodden, terrain of policy and economic action which would reduce tree clearing.

Forest and forest industries were, it seemed, often considered part of the problem – not part of the solution.

It is true that in developing countries there is still much to be done regarding regulation, governance, enforcement and chain of custody in relation to trees. By some accounts 10,000 football fields are cleared in south east Asia every day – mostly as farmers increase area for cropping and grazing stock. At a global 'carbon account book' level such deforestation is hitting very hard, and has driven the creation of the campaign to fund numerous programs, most notably, REDD + (Reducing Emissions from Deforestation and land Degradation). ENGO's are heavily critical of the growth of plantations (most specifically oil-palm in south east Asia) and on the deforestation taking place due to expanding agriculture.

A brochure available at most sessions asked 'How much forest will you eat today?' graphically illustrating the 'forest' which has gone into 'producing one hamburger'.



A strong anti 'Land clearing for agriculture' theme, Global Landscapes Forum, Warsaw

Whilst there are undoubtedly difficult issues of sustainability to address in many countries, the narrow focus at the Global Landscapes Forum allowed little room for positive, sustainable forest and forest industries stories. This is despite the REDD+ mechanism specifically listing 'sustainable forestry' as a goal.

An understanding of this mainstream UN and global eNGO perspective is vital for those attempting to influence the policy debate in Australia.

The Conference of the Parties (COP) 19, Warsaw Stadium

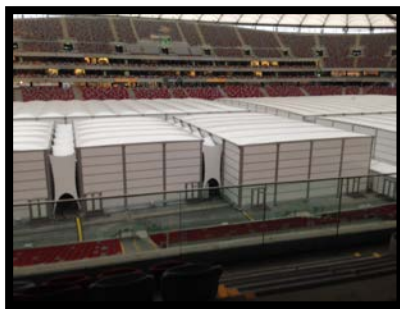
The nineteenth Conference of the Parties was held in Warsaw stadium. This secure venue with high fences and well managed entry and exit was no doubt chosen for both its capacity and its ability to be made secure.



Warsaw stadium, venue for COP19

The registration process was exhaustive. Every delegate was screened 'airport like' on the way in and 'badge swiped' out of the venue.

The central oval was covered with buildings for the purposes of the event, but all the 'side events' attended by those not in the official negotiating parties, were conducted in rooms which encircled the stadium seating.



COP19 – transformed the Warsaw stadium interior into a village of temporary rooms

Observations:

COP19 was seen by many as a preparatory meeting for the major Conference which will be held in Paris in 2015. At that 2015 meeting all countries will have to agree to new rounds of commitments for the third Kyoto period commencing in 2020. This meant that the Warsaw meeting did not carry the very high expectations of some meetings in the past – notably Bali or Copenhagen. Differences between developing and developed countries were, if anything, more entrenched.

Negotiations between the ‘Parties’ were long and reportedly fractious, often running into the small hours. The principal discussions revolved around the text covering the proposed 2015 timeframe for countries to table their next round of targets. Were they to be legally binding ‘commitments’ or, the rather looser, ‘contributions’?

The other major tranche of work being undertaken at Warsaw was the seeking by the conference to gain agreement on a ‘loss and damage caused by climate change’ fund for developing countries (to be paid for by developed countries). In the end, agreements appeared to be reached in some areas simply so that participants could report some progress. As it was, the major eNGO groups staged a ‘walk-out’ in the last few days anyway, complaining that developing countries were being too obstructionist.

The Australian negotiating team was led by a Department of Foreign Affairs career officer, Ambassador for the Environment Mr Justin Lee.

It was notable that the decision by the Australian Government to not send a Minister to the talks, allowed a widespread misconception to arise that Australia had abandoned all climate change targets. In fact, the Abbott Government has reaffirmed that our national target is 5% below year 2000 emission levels and the \$1 Billion ‘Direct Action’ program will be used to ensure that target is met.

Unlike the ‘Global Landscapes Forum’, the COP side-events covered a large range of associated issues and groupings and provided informative briefings – such as by the World Bio-energy Association. Although it should also be observed that the overwhelming weight of sessions and information was alarmingly anti-industry.

Under the United Nations framework every nation has one vote in a meeting – from the smallest (e.g. Nauru pop. 9,000) to the largest (e.g. China pop. 1.3 billion). The many delegates from poorer countries such as those from Africa and the Pacific are supported by global sponsors to attend the meeting and have access to technology provided for free.



The UN provided laptops, printers etc for developing nation delegates were well used

It is naive to believe that, for a great many of the nations attending and voting at these meetings, national interest as well as global climate concern is not at play. The dominant dialogue at COP can be summarised thus;

‘Wealthy developed nations created this carbon problem over the last two hundred years. We all know that as the developing nations chart the same course of development (in a much accelerated timeframe) we will all then be dealing with a carbon problem that will overwhelm us all. The only fair thing is the developed countries have to pay to change the outcome.’

Conclusion

The Warsaw Climate talks carried none of the hype or high expectations of some other recent climate change talks. It appeared many nations (including Australia) were prepared to simply ‘show the flag’ and wait and see what develops over the next 12 months. An aggressive round of Ministerial level meetings is being organised by the UN to try to pick up the momentum – commencing with a high level summit in New York with the UN Secretary General in September. Clearly COP20 (in Peru) will be much more important in terms of indicating whether the Kyoto process has enough momentum to make the transition into a new international commitment period.

The Australian Government has indicated that it will not advance in the commitments it has made if there are not commensurate commitments from competitor nations.

It has also indicated that it will only be ‘purchasing’ carbon abatement ‘on shore’ – despite repeated pleas from UN players and some industries for cheaper off shore permits to be included in Direct Action. Forest and Forest Product industries should continue to oppose the purchase of off shore abatement as this removes funding from Australia and the potential for our industries to participate.

The Senate has not yet agreed to the Government's attempts to repeal the Carbon Tax, however this could occur when the composition of the Senate changes post June.

Based on this, and the clear signals arising from Australia's approach to the COP19 meeting, Forest and Forest Product industries should not be pinning hopes on policy settings in this country changing in the near term.

Domestic policy work must focus on driving maximum potential from the already available domestic commitments in both targets and dollars.

Details of Travel

14 November, 2013 - Departed Australia

15 November, 2013 - Arrived Warsaw

Saturday 16 & Sunday 17 November, 2013 - Attended Global Landscapes Conference

Monday 18 & Tuesday 19 November, 2013 - Attended Conference of the Parties 19

Wednesday 20 November, 2013 - Departed Warsaw

Media Release



7 November 2013

Forest industry calls for carbon tax abolition before global climate change talks

The Australian Forest Products Association (AFPA) has added its voice to the growing chorus demanding business certainty, calling on the Australian Parliament to abolish the carbon tax.

The Australian Parliament resumes just as the 19th round of the United Nations Framework Convention on Climate Change (UNFCCC) talks commence in Warsaw Poland, otherwise known as the Conference of Parties 19 (COP 19).

Chief Executive Officer Mr Ross Hampton, who will be travelling to Warsaw to represent the Australian forest and forest products industry, said, 'The Coalition has a clear mandate to remove the carbon tax and replace it with the Direct Action policy.

'It is in our national interest that businesses have certainty and that our political and departmental representatives sent to negotiate at COP 19 have policy clarity at home.

'Both the Abbott Government and the previous Labor Government agreed to unconditionally reduce national GHG emissions by 5 per cent over 1990 levels by 2020.

'At COP 19, AFPA will be arguing that forest harvesting and regeneration has the potential to play a much greater role in Australia's carbon emission reduction target', said Mr Hampton.

A growing body of research is showing that failing to include life cycle assessments of harvested wood products in climate policies can lead to perverse mitigation outcomes. This is because a narrow focus on the carbon sequestered in standing forests is only part of the solution and does not capture some of the longer term abatement benefits from forestry.

AFPA will be advocating the need to recognise **all** of the major pathways for emissions abatement from forestry, including the carbon sequestered by growing trees and stored in forest products, the substitution of more emissions intensive materials (such as steel and concrete) with forest products, and the use of woody biomass for energy, thereby displacing fossil fuels.

The other major issue which AFPA will be seeking to have properly considered at the Climate talks is the growing number of 'megafires' and their associated impacts on carbon emissions at a global scale.

Mr Hampton said, 'We are seeing a growth in the number of forest fires of massive scale and intensity. A changing climate may indeed be a contributing factor but AFPA will argue that significant blame can be sheeted home to a lack of effective fuel reduction activities over recent decades.

... more

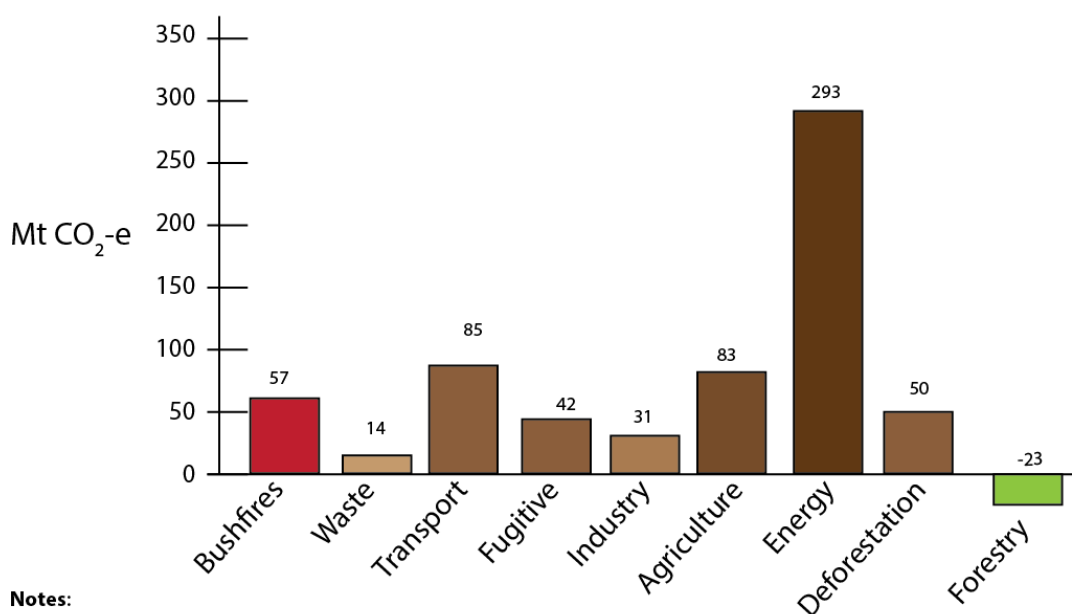
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'The current approach of 'suppress flames at all costs' while severely limiting burning off and fuel reduction by extracting some trees and undergrowth, has made many forests denser, drier and more fire prone.

'We have created the powder kegs around our cities and we now hold our breath every summer wondering which will explode.'

'The magnitude of green-house gas emissions from bushfires is so significant it must be on our climate talk's agenda. In Australia, the average annual emissions from bushfires over the past decade was 57 million tonnes (Mt) – making it a larger contributor than four other categories including industry', said Mr Hampton.

Australia's annual emissions



Notes:

1. All except bushfires based on Kyoto period average for 2008-12
2. Bushfires based on annual average over 10 year period 2001-10
3. Forestry activities (including plantations) are accounted for as a nett carbon sink
3. Source for all figures DCCEE (www.climatechange.com.au)

AFPA represents forest growers, harvesters, and manufacturers of timber and paper products.

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Opinion piece



Ross Hampton CEO

October 2013

Going to the Climate Talks to shout 'Fire'!

There will be many millions of words spoken and written in Warsaw over the next two weeks as the world embraces again in the annual, two steps forward, one step back, Kyoto dance.

When I get my chance to speak I plan to shout 'fire'! Or 'bushfire'! to be more exact.

Why?

Because it is time the world got real about fires, their effect on emissions and, to use the language of the Kyoto world, mitigation. Did you know that the massive 2003 fires which destroyed 500 homes in Canberra and raged across the snowy mountains pumped more greenhouse gases into the atmosphere in a month than our entire national emissions in a year?

The fires which recently clawed at Lithgow and the Blue Mountains threw up 3.5 million tonnes in the first week. In the last decade in fact bushfires have contributed an average of 57 million tonnes of greenhouse gases each year to the atmosphere. That's a larger contribution than four other categories being measured for our national carbon accounts; 'waste', 'industry', 'fugitive' and 'deforestation'.

But what was the debate we had as the helicopters were firebombing in the Blue Mountains recently? It was simply whether climate change is making such October fires more likely!

No-one seemed to want to really talk about the elephant in the room.

The truth is be they horrific 'mega-fires', or the more traditionally defined 'bushfires' (which of course still kill and destroy across vast distances) they can all only be dealt with effectively before they start. Sending in the water tankers and volunteers is attempting to close a barn door on a madly bolting horse.

No, the sane science is well and truly in. The only option we have is to reduce the amount of fuel which has accumulated since our Indigenous first Australian's stopped regularly burning the landscape.

What can we do?

We can remove some of that fuel. Yes that means some trees, bushes and lots of woody debris. The goal must be to help the bush revert to a more ecologically fire resistant state.

And if we had longer memories this wouldn't be such a challenging idea.

Many of the early explorers, such as Ludwig Leichardt and John Oxley, commented on the openness of many woodland areas such as the Pilliga forest. Today, you would need a machete and be crawling to pierce the impenetrable scrub.

AFPA represents forest growers, harvesters, and manufacturers of timber and paper products.

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Opinion piece



We have actually made the landscape and our forests dangerously thick by putting out the sparks and pushing out the industry. When the media reports each summer "the bush is a tinderbox" they would be more accurate saying "the bush is a well-stocked powder magazine".

Surely we need to think again about reducing the size of the hazard. Renting ever larger water bombing helicopters is like adding more seats to an ambulance at the bottom of a cliff. Smart management suggests smaller ambulances at the top of the cliff.

In Europe they have a better balance. Somehow they have managed to avoid the trap of defining landscapes in the mutually exclusive language of "preserved" or 'utilised'.

Instead they are quite comfortable with the concept of forests which deliver multiple public goods - and they allow the landscape to vary over time. Well-managed forestry is not seen to be at odds with bush walking, camping, biodiversity and green areas.

In the USA too they appear to have a far more mature approach.

There the US Forest Service has a program of managing vast areas of landscape on a journey back to a more ecologically natural open state. This involves the removal of some of the trees which are used for renewable energy production. Combined with winter burn-offs they are producing a more open landscape which, you can see from old photos, is much closer to the country of one or two hundred years ago.

In Australia if we keep pretending we can deal with mega fires with fire trucks we will consign ourselves to ever increasing environmental loss.

Loss of species, loss of wonderful vistas and loss of a previous raw material which Australian workers can turn into windows, house frames, tables and fine writing paper.

And, as I said at the start, we consign ourselves to sending lots and lots of carbon in the atmosphere.

As the smoke still rises from the Blue Mountains fires those who care about both mitigation and adaptation in the face of a climate challenge are heading to Warsaw, Poland for the climate talks.

And I will be taking the climate elephant called 'bushfires' with me.



**SUBMISSION TO AUSTRALIAN GOVERNMENT NEGOTIATORS AT THE 19TH CONFERENCE OF
THE PARTIES TO THE UNITED NATIONS FRAMEWORK CONVENTION ON CLIMATE CHANGE
Warsaw, Poland**

November 2013

The Australian Forest Products Association (AFPA) is the peak national industry body representing the Australian forest, wood and paper products industry's interests to governments, the general public and other stakeholders on matters relating to the sustainable development and use of Australia's forests and associated manufacturing and marketing of wood and paper products in Australia.

Introduction

Wood, and every product made from wood, demands a far greater role in both domestic and international policy making if we are serious about constraining growth in greenhouse gases.

At an international level negotiators have long acknowledged the positive role that sustainable harvesting and regeneration of forests can play but have struggled to provide sufficient policy signals to fully capture these opportunities. They have principally focused on avoiding the widespread deforestation (i.e. land clearing) practices in other parts of the world, which are legitimately considered a major source of global carbon emissions.

In Australia likewise policy makers have as yet failed to properly account in any government incentives program – be it carbon farming or renewable energy – for the fact that trees are the ultimate renewable resource and should be our best friend in the battle against climate change.

Background

AFPA, and its antecedents the National Association of Forest Industries and the Australian Plantations Products and Paper Industry Council, has had a long history of stakeholder engagement on international climate change negotiations as well as the ongoing development of domestic climate schemes.

This submission is provided to the Australian Minister for Foreign Affairs the Hon Julie Bishop and the Australian Ambassador for Climate Change, Mr Justin Lee. This paper is intended to help inform the Australian Government negotiating position at the 19th meeting of the Conference of the Parties (COP) to the United Nations Framework Convention on Climate Change (UNFCCC) in Warsaw, Poland.

Its purpose is to convey the high level principles and views of AFPA in relation to international climate negotiations as they relate to the forest, wood and paper products industry.

Summary

- AFPA acknowledges the significant body of research showing the potential for reductions in greenhouse gas (GHG) emissions from forest related abatement activities. This research has shown that sustainably managed forests and forest product industries can make a positive contribution to reducing or abating GHG emissions. The major pathways for emissions abatement include:
 - the carbon sequestered in growing forests;
 - the carbon stored in harvested wood products;
 - the substitution of high emissions materials (e.g. steel, concrete) with wood and other fibre based products that have a substantially lower emissions footprint; and
 - the use of woody biomass for renewable energy, thereby displacing fossil fuels.
- The significant potential for the forest and forest product industries to contribute to climate change mitigation was acknowledged in the 4th assessment report of the International Panel on Climate Change (IPCC), which stated:

A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.¹

¹ Nabuurs, G.J., Masera, O., Andrasko, K., Benitez-Ponce, P., Boer R, Dutschke, M., Elsiddig, E., Ford-Robertson, J., Frumhoff, P., Karjalainen, T., Krankina, O., Kurz, W.A., Matsumoto, M., Oyhantcaba, W., Ravindranath, N.H., Sanz Sanchez, M.J., and Zhang, X. (2007). *Forestry (9), in Climate Change (2007): Mitigation. Contribution of Working Group III to the Fourth Assessment report of the Intergovernmental Panel on Climate Change*. (Metz B., Davidson O.R., Bosch P.R., Dave R and Meyer L.A. (eds.), Cambridge University Press, UK, and New York, USA.

Key principles

Benchmark of ‘what the atmosphere sees’

- AFPA notes the important role of forest related mechanisms in the Kyoto Protocol (KP) and broader Framework Convention on Climate Change for promoting mitigation. These mechanisms include:
 - the KP provisions under Article 3.3 (i.e. afforestation, reforestation and avoided deforestation) and Article 3.4 (forest management); and
 - links to the Clean Development Mechanism (CDM) and REDD+ (Reduced Emissions from Deforestation and Forest Degradation) measures.
- With regard to climate change mitigation policies, the benchmark for assessment of their effectiveness must be in terms of net verifiable emissions and removals, or in other words ‘what the atmosphere sees’. This implies that all relevant carbon pools from sinks and sources should be included in accounting methods.

Full life cycle accounting

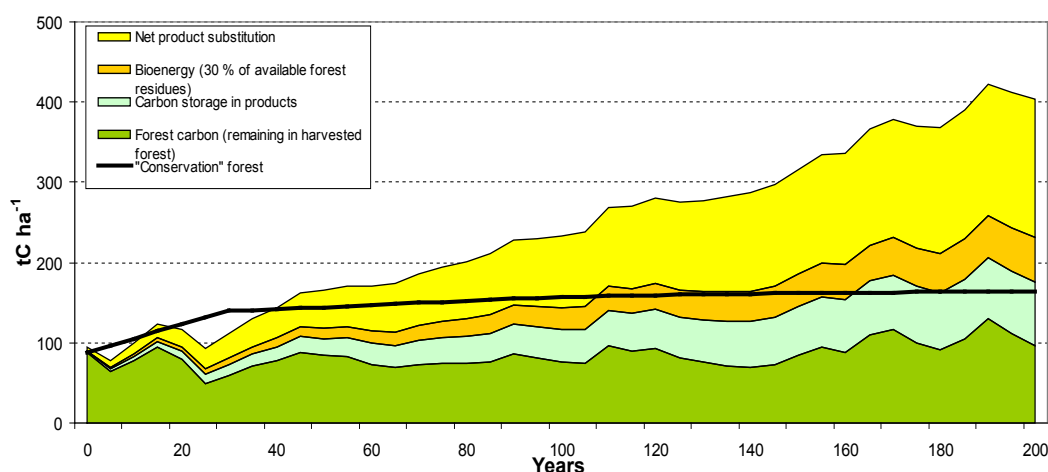
- Given the role of harvested wood products (HWPs) as a carbon store and their substitution effects over time, there is a need for more robust and detailed life cycle inventory (LCI) and life cycle assessment (LCA) studies and methods as part of international deliberations on forest-related measures.
- By tracking the inputs and outputs for each stage of processing and consumption, the LCI of a product can be traced from cradle-to-grave, including in-service, recycling and landfill.
- Full life cycle accounting can expose unintended carbon policy impacts, such as:
 - carbon exchanges that incentivize reduced harvesting, which can contribute to greater emissions from using more fossil fuels that can be offset by increasing forest carbon stores; and
 - ignoring the substitution of wood for fossil fuel intensive products since it has the highest leverage in reducing emissions².

² Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L. and Sathre, R. (2011). Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns. *Carbon Management* 2: 303-333.

Multi-decade approach

- AFPA supports the Australian Government advocating a long term view on international and domestic mechanisms for promoting forest related mitigation. This is because a growing body of research is demonstrating that a failure to undertake life cycle assessment leads to short term approaches, such as reduced harvesting, that can lead to perverse mitigation outcomes³.
- Recent modelling has shown that sustainably managed wood production forests can produce better carbon mitigation outcomes compared to reserved (i.e. unharvested) forests for two native forest types in coastal New South Wales, taking into account the multiple carbon abatement pathways identified above⁴.
- By taking a multi-decade approach (e.g. 50 to 100 years), the perverse outcomes from 'reduced harvesting' options become apparent, as the carbon stored in HWPs and emissions reductions from the use of biomass for renewable energy continue to increase in perpetuity, in addition to the carbon stored in the regrowing forest (refer Figure 1).

Figure 1. Carbon emission abatement implications (t C ha⁻¹ sequestered or displaced) of the 'conservation' and 'harvest' scenarios for North Coast forests.



Source: Ximenes et al (2012).

³ Malsheimer, R.W., Bowyer, J.L., Fried, J.S., Gee, E., Izlar, R.L., Miner, R.A., Munn, I.A., Oneil, E. and Stewart, W.C. (2011). Managing forests because carbon matters: integrating energy, products and land management policy, *Journal of Forestry* 109(7S): S7-S50.

⁴ Ximenes F, George B., Cowie A., Williams J. and Kelly G. (2012) *Greenhouse gas balance of native forest in New South Wales, Australia. Forests* 3: 653-683.

- Similarly, research from the United States has shown that increasing harvest over the next 100 years, for a Midwest national forest, increases the strength of the carbon sink despite sequestration and harvesting often being portrayed as being in conflict⁵.
- These recent studies simply add to the body of knowledge that led the IPCC to conclude that sustainably managed forests lead to the largest sustained mitigation effort over time. This fundamental principle should be reflected more explicitly in international climate policy measures.

Incentives for improved fire management

- AFPA supports landscape level accounting for forest management activities. This should include removals and emissions on forest lands from anthropogenic activities.
- However, AFPA believes there is a lack of recognition in the international negotiations of the growing occurrence of ‘mega-fires’ and their implications for mitigation and adaptation. Mega-fires are described as those fires that comprise a high proportion of annual total suppressions costs, area burnt and emissions as a result of their scale and intensity⁶.
 - The 2003 south-eastern fires in Australia, for example, generated 190 Mt of emissions, equivalent in magnitude to almost a third of Australia’s national target of 591 Mt per year of emissions reductions under the KP first commitment period.
- The problem of mega-fires has been attributed to an anthropogenic emphasis on fire suppression in many countries rather than preventative fuel management. This has led to higher tree stocking and fuel loads compared to historical forest ecological conditions and contributed to fires of increasing scale and intensity⁷.
- For example, it is well accepted that earlier Indigenous burning practices in Australia had a direct impact on wildfire behaviour:

*Australian bushfire scientists and anthropologists generally agree that, before European settlement, Indigenous people carried out frequent, regular and wide-scale burning, especially in the drier forest types. The net result was a mosaic of burnt and unburnt patches that limited the extent and intensity of fire under severe weather conditions.*⁸

⁵ Peckham, S.D., Gower, S.T. and Buongiorno J. (2012). Estimating the carbon budget and maximizing future carbon uptake for a temperate region in the U.S. *Carbon Balance and Management* 7: 6 (doi: 10.1186/1750-0680-7-6).

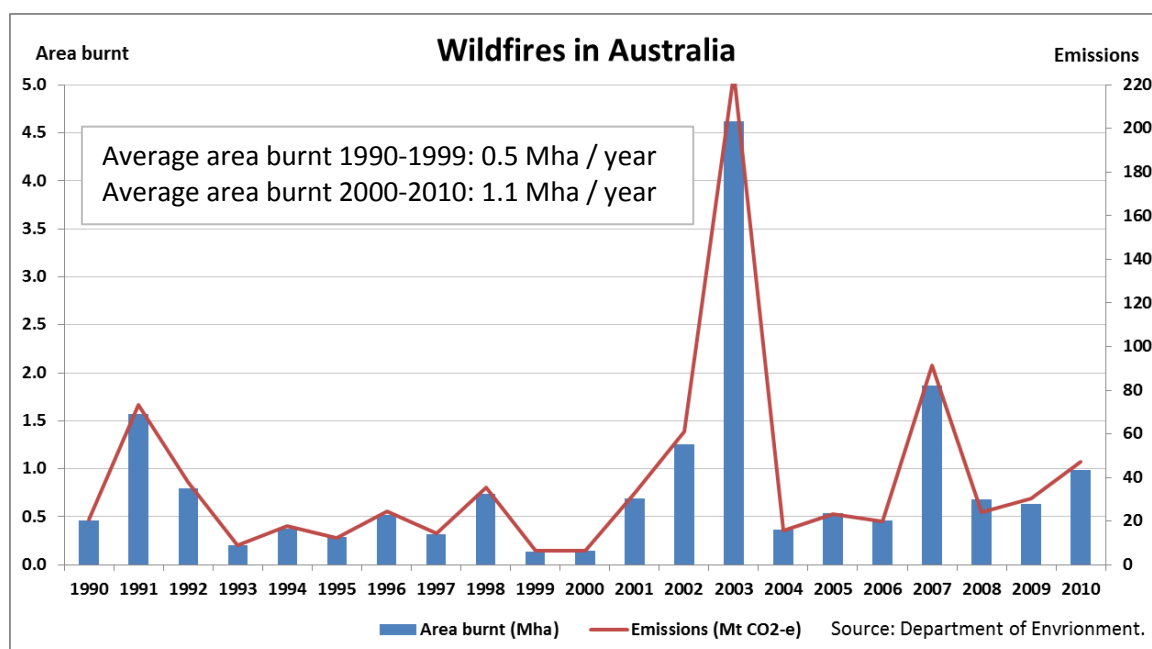
⁶ Adams, M.A. (2013). Mega-fires, tipping points and ecosystem services: managing forests and woodlands in an uncertain future. *Forest Ecology and Management* 294: 250-261.

⁷ Williams J. (2013). Exploring the onset of high-impact mega-fires through a forest land management prism. *Forest Ecology and Management* 294: 4-10.

⁸ Montreal Process Implementation Group for Australia 2008, *Australia’s State of the Forest Report 2008*. Bureau of Rural Sciences, Canberra.

- Over the past decade there have been numerous state and national public inquiries⁹ into the inadequacy of bushfire mitigation including inadequate levels of fuel reduction, particularly on public forest lands.
- The downsizing of the forestry industry brought about by the transfer of large tracts of multiple-use state forest to formal conservation reserves has also been associated with a more passive approach to fuel reduction on public forest land. This has contributed to a decline in resources for fuel reduction and suppression, including fire management personnel and the maintenance of access tracks and equipment¹⁰.
- The average annual area burnt from bushfires in Australia has doubled over the past decade, largely as a result of a number of very large hot fires (Figure 2), while the area treated for fuel reduction has declined over the same period. Between 1990-1999 and 2000-2010, the average annual area treated for fuel reduction declined respectively from 627,000 hectares to 456,000 hectares.

Figure 2. Area of wildfires in Australia, 1990-2010



⁹ Parliament of New South Wales Inquiry into the 2001/2002 Bushfires; House of Representatives Select Committee on the Recent Australian Bushfires 2003; Council of Australian Governments National Inquiry on Bushfire Mitigation and Management 2004; Victorian Bushfires Royal Commission 2009; Senate Inquiry into Bushfires in Australia 2010.

¹⁰ Stephens, M. (2010). Bushfire, forests and land management policy under a changing climate. *Farm Policy Journal* 7: 11-19.

- AFPA supports the domestic and international development of fuel management initiatives and programs for bushfire mitigation and emissions reduction.
- Research in Western Australia¹¹ and the United States¹² has shown that fuel reduction can be effective at reducing the severity and extent of future wildfires, and associated long term reductions in wildfire carbon emissions¹³.
- In addition, the United States has initiated a number of large scale forest restoration activities aimed at restoring more fire-resilient ecological conditions through active fuel reduction. The 2009 Collaborative Forest Landscape Restoration Programme (CFLRP), for example, has provided \$400 million for the treatment of fuels across 23 forested landscapes for multiple goals, including severe fire risk reduction, habitat restoration, bioenergy development and employment¹⁴.
- AFPA therefore supports more collaborative international work on forest fire management for mitigation and adaptation purposes, recognising the longer term benefits from active fuel reduction for emissions reductions and risk management. This work should include capacity building initiatives and programs as well as targeted research on carbon flows at a landscape scale from fuel reduction.

Robust land sector accounting

- AFPA notes the UNFCCC Durban decision CMP.7 for Land use, land-use change and forestry (LULUCF) for the mandatory inclusion of forest management activities in the second commitment period (i.e. 2013-2020) of the KP.
- As part of this decision, countries have adopted a Forest Management Reference Level (FMRL) framework. The FMRL framework aims to provide a credible baseline reference level for assessing net changes in future emissions and removals from forest management activities in the second commitment period of the KP.
- The importance of a principled approach to setting reference levels for robust climate outcomes has been noted, as well as the speculative potential for windfall credits in the second commitment period of the KP from reduced harvesting activity¹⁵.

¹¹ Sneeuwjagt RJ et al (2013). Opportunities for improved fire use and management in California: lessons from Western Australia. *Fire Ecology* 9: 14-24.

¹² Hartsough BR et al (2008). The economics of alternative fuel reduction treatments in western United States dry forests: Financial and policy implications from the National Fire and Surrogate Study. *Forest Policy and Economics* 10: 344-354.

¹³ Stephens, S.L., Boerner, R.E.J., Moghaddas, J.J., Moghaddas, E.E.Y., Collins, B.M., Dow, C.B., Edminster, C., Fiedler, C.E., Fry, D.L., Hartsough, B.R., Keeley, J.E., Knapp, E.E., McIver, J.D., Skinner, C.N. and Youngblood, A. (2012). Fuel treatment impacts on estimated wildfire carbon loss from forests in Montana, Oregon, California, and Arizona. *Ecosphere* 3(5): 1-17.

¹⁴ Schultz, C.A., Jedd, T. and Beam R.D. (2012). The Collaborative Forest Landscape Restoration Program: a history and overview of the first projects. *Journal of Forestry* 110: 381-391

¹⁵ Macintosh A. (2011). Are forest management reference levels incompatible with robust climate outcomes? A case study of Australia. *Carbon Management* 2: 691-707.

- AFPA does not support accounting rules or policies that would allow potential credits from reduced harvesting activity on Forest Land, as it is contrary to the fundamental IPCC principle that sustainably managed forests (i.e. forests subject to periodic harvest and the use of wood products) produce the largest sustained mitigation benefit¹.
- It is critical that the FMRL framework fully recognises the multiple abatement pathways from harvesting activity and their substitution effects^{2 3 4 5}, in order to avoid perverse accounting rules and carbon emission outcomes.
- In addition, AFPA has a number of concerns regarding the identification of Forest Lands and treatment of disturbances, primarily fires, with respect to the Australian Government submission to the UNFCCC on its revised Forest Management Reference Level (FMRL)¹⁶.
- The Australian Government FMRL submission largely restricts forest management land to state multiple-use forest (MUF) tenures where sustainable timber harvesting activities are undertaken (i.e. 9.4 Mha). This area represents only a small proportion of the total area of forest in Australia (i.e. 149 Mha).
- AFPA considers the narrow definition of forest management land to be a serious flaw in the FMRL approach, as it fails to take into account the impact of human activity on the frequency and severity of fires across the landscape, including on MUF and non-MUF natural forest.
- The Durban land sector rules also include the provision of a 'natural disturbance exclusion' clause, whereby wildfires of a significant magnitude can be excluded as a natural disturbance that exceeds an accepted background level of such annual disturbances. Natural disturbances are defined as:

"Natural Disturbances" are non-anthropogenic events or non-anthropogenic circumstances. For the purposes of this decision, these events or circumstances are those that cause significant emissions in forests and beyond the control of, and not materially influenced by, a Party.

- While accepting the notion of managing for climatic variability, the assumption that natural disturbances outside the MUF area are primarily non-anthropogenic is not substantiated in an Australian context, given the direct impact of human activity on the build-up of fuels and pre-conditions that can contribute to fires of increasing scale and intensity and higher associated emissions.
- The current definition of Forest Land negates any potential liability for disturbances that are partly anthropogenic and provides no incentive for mitigating emissions from wildfires across the landscape

¹⁶ Australian Government (2011). Submission to the AWG-KP, Forest Management Reference Level, September.

http://unfccc.int/files/meetings/ad_hoc_working_groups/kp/application/pdf/australia_290911.pdf

- Furthermore, bushfires in non-MUF areas not only represent a large source of emissions and risk to life and property, they represent a significant risk to the industry through the loss of standing wood and fibre resources within the MUF estate.
- AFPA therefore supports a more thorough scientific review of the underlying basis and rationale for the FMRL approach taken by the Australian Government with respect to the identification of Forest Land and the treatment of bushfires, as well as the development of more sensible measures for addressing bushfires across the landscape.

Supporting the role of bioenergy in mitigation

- Globally, bioenergy accounts for around 77 per cent of global renewable energy, which represents 13 per cent of the world's primary energy mix. Furthermore, woody biomass accounts for nearly 90 per cent of the world's renewable energy supply¹⁷.
- Given the current and ongoing importance of bioenergy for climate mitigation, international deliberations should continue to promote bioenergy as a renewable energy source, particularly woody biomass given its links to multiple abatement pathways and the concept of cascading mitigation benefits from the use of HWPs and bioenergy at the end of their useful lifecycle¹⁸.

¹⁷ International Energy Agency (IEA) (2009). Bioenergy – a Sustainable and Reliable Energy Source, Main Report. IEA Bioenergy: ExCo 2009-06.

¹⁸ United Nations Economic Commission for Europe/Food and Agriculture Organisation (UNECE/FAO), Proceedings of the Workshop on Harvested Wood Products in the Context of Climate Change Policies, 9-10 September 2008, United Nations Palais des Nations, Geneva, Switzerland.



11 November 2013

The Hon Julie Bishop MP
Minister for Foreign Affairs
Parliament House Canberra ACT 2600
e: foreignminister2013@dfat.gov.au

Dear Minister

**Forestry and Forest Products submission to the Australian Government to inform
Conference of the Parties negotiating position**

Please find attached AFPA's submission to the Australian Government which we hope will inform the national negotiating position at the United Nations Framework Convention on Climate Change (UNFCCC), Conference of the Parties (COP19), talks in Warsaw, Poland.

The submission strongly urges the Australian Government to champion the very positive role that forestry and forest products industries can play in assisting the Australian Government meet globally agreed targets for reduced human induced greenhouse gas emissions.

I will be attending the climate change talks on behalf of the Australian forestry and forest products industries.

I commend our industry submission to you.

Yours sincerely

A handwritten signature in blue ink, appearing to read "Ross Hampton".

Ross Hampton
Chief Executive Officer

cc: The Hon Greg Hunt, Minister for the Environment
greg.hunt.mp@environment.gov.au
Mr Justin Lee - Ambassador for Climate Change
Justin.lee@climatechange.gov.au

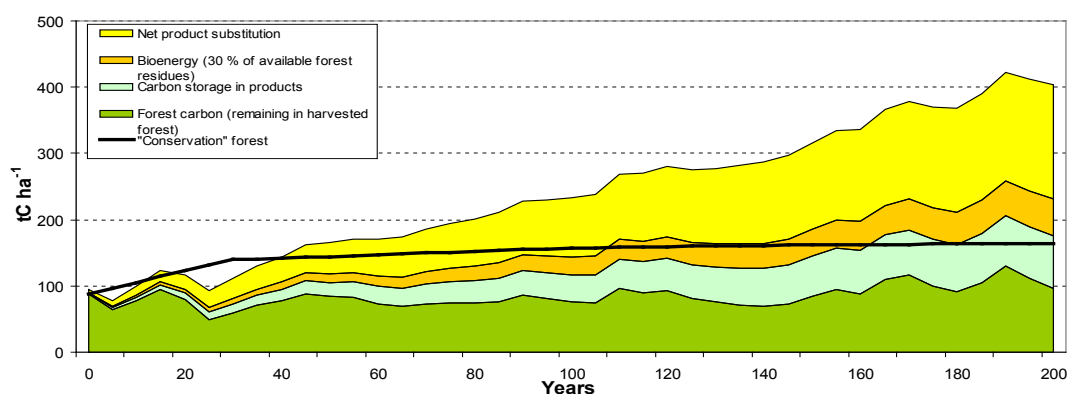
Sustainable forest management

SIMPLY ATTEMPTING TO SEQUESTER CARBON IN FORESTS IN-SITU AND ATTEMPTING TO PRESERVE THAT STOCK IN PERPETUITY MISSES ENTIRELY THE BIGGER PICTURE OF THE ROLE OF SUSTAINABLE FOREST MANAGEMENT IN MITIGATING EMISSIONS.

AT SOME POINT IN TIME A NATURAL FOREST WILL REACH MATURITY AND BEGIN TO DECOMPOSE OR BE DESTROYED THROUGH NATURAL DISTURBANCE SUCH AS WILDFIRE.

Not all forests should be subject to periodic harvesting, but sustainable timber harvesting should be incorporated into a whole of landscape perspective, taking into account their multiple carbon mitigation and other benefits. Recent research for two coastal forest types in New South Wales, Australia has shown that the long term carbon mitigation benefits from production forests exceed by 240% those from forests set aside for conservation taking into account these carbon flows over a longer term (Ximenes et al 2012). This information is shown in the graph below and explained in the box.

Sustainable forest management acknowledges that humans have already left a large footprint on the natural environment and this footprint needs to be managed in the interests of all the stakeholders in the forest estate. It recognises that fauna and flora can only be protected and preserved by accounting for their distribution and survival over the entirety of the landscape. It also recognises that some of the conservation and biodiversity objectives of forest management are better met by the active management of the forest rather than its benign neglect.



GREENHOUSE GAS IMPLICATIONS OF THE 'CONSERVATION' AND 'PRODUCTION' SCENARIOS FOR NORTH COAST FORESTS MODELLED OVER A 200 YEAR PERIOD

WHAT DOES THE GRAPH SHOW?

- A comparison of the long term greenhouse gas implications from production (actively managed) forests, with conservation forests set aside as 'carbon sinks'.
- It shows that a production forest can produce superior emission reduction outcomes. This is because of the carbon stored in the forest and harvested products; the substitution of wood for steel and concrete which require high amounts of energy for their production; and the bioenergy from wood residues that can displace fossil fuels.
- Forests 'set-asides' do not necessarily result in a better outcome for emission reductions over the long-term.

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ASSOCIATION**
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FOREST MANAGEMENT

- ✓ Sustainable forest management is the science of managing the forest estate – both natural and planted – for a variety of outcomes. It attempts to manage the estate on a whole-of-landscape basis because it is the entirety of the forest and near-forest landscape which bears on achieving any of these outcomes. Possible outcomes for which the entirety of the landscape needs to be managed include carbon sequestration, wood products, woody biomass extraction for renewable energy, water regulation and its quality, fire prevention, control and suppression, and fauna and flora conservation.

The significant potential for the forest and forest product industries to contribute to climate change mitigation was acknowledged in the 4th assessment report of the International Panel on Climate Change (IPCC), which stated:

A sustainable forest management strategy aimed at maintaining or increasing forest carbon stocks, while producing an annual sustained yield of timber, fibre or energy from the forest, will generate the largest sustained mitigation benefit.

Given the role of harvested wood products (HWP) as a carbon store and their substitution effects over time, there is a need for more robust and detailed life cycle inventory studies and methods as part of international deliberations on forest-related measures and the role of sustainable forest management in emissions mitigation.

There are good grounds for hope that exploitative timber extraction (e.g. illegal logging) and poor forest management can be ameliorated or eliminated using techniques we already know and by integrating forest practice into our understanding of broader land management and improved public policy. Advanced sustainable forest management practices are already standard in Australia and can be built on to assist in global united action against climate change.

Forests should be a central part of any attempt to mitigate climate change. The carbon dynamics of forests are affected by forest age, tree density and how they have been managed over time.

The world's forests can be managed to achieve multiple outcomes. These outcomes include all the benefits they currently deliver such as:

- biodiversity,
- recreation,
- non-timber goods and services,
- water quality values,
- carbon capture and storage, and
- the commercial returns that well managed forests produce.

This latter opportunity includes sustainable harvesting and, increasingly, the growing potential for the extraction of woody biomass for renewable energy. The sustainable management of forests can maintain them as carbon sinks while sequestering carbon in long lived wood products.

Sustainable forest management, which incorporates the sustainable harvest of trees for wood and paper products, can contribute to long term carbon emissions abatement through multiple pathways, including:

- the atmospheric carbon captured and stored in growing forests;
- the carbon stored in durable wood products and substitution of more emissions intensive building materials such as steel, aluminium and concrete; and
- the use of wood waste and biomass for renewable energy (displacing fossil fuel sources such as oil and gas).