

SUBMISSION TO THE MANDATORY RENEWABLE ENERGY TARGET REVIEW PANEL

1. Introduction

Lawyers for Forests Inc ("LFF") is a non politically aligned association of legal professionals working to promote the conservation and better management of Victoria's native forests, and an awareness of environmental issues generally. LFF believes there should be no logging, or other activities, which detrimentally affect old growth and high conservation value forests.

LFF's main focus is on the legal mechanisms in place to conserve and manage Victoria's native forests. LFF also has an interest in broader environmental concerns, including ecological sustainability and promotion of renewable energy.

LFF welcomes this opportunity to provide a submission (albeit brief) to the Panel undertaking the review of the Mandatory Renewable Energy Target ("MRET").

2. Terms of Reference

The Panel is responsible for reviewing the operation of the Renewable Energy (Electricity) Act 2000 ("the Act"), to determine the matters set out in the Terms of Reference. The Terms of Reference that this submission addresses relate to item f (which references the use of non-plantation forestry waste) and item h (the level of targets).

3. Eligible Renewable Energy Sources

"Eligible renewable energy sources" are defined in section 17 of the Act to include "wood waste". The regulations under the Act then go on to outline the criteria for use of native forest as an eligible renewable energy source.

The purpose of the Act is to stimulate the production of renewable energy. LFF does not consider the logging, wood chipping and burning of our native forests to be production of renewable energy. This is particularly so in the case of old growth forests. In any event, the government should be encouraging "clean" renewable energy. Studies have shown that burning of forest matter can release up to four times as much greenhouse gas as coal.

LFF supports the August 2000 recommendation that *non plantation native forest wood products and wood wastes be specifically excluded from the list of eligible renewable energy sources*, by the Senate Environment, Communications, Information Technology and the Arts Reference Committee ("Senate Committee") that reviewed the Renewable Energy (Electricity) Bill 2000 and the Renewable Energy (Electricity) (Charge) Bill 2000.

The Senate Committee was particularly concerned that *changes in the economics of using forest biomass (through installation of on-site generators or a further fall in woodchip export prices) could increase pressure on native forest resources*. This is also of grave concern to LFF and other members of the community. LFF is aware of a number of proposals since the commencement of the Act to utilise "excess" wood chips in power plants. These proposals have been widely condemned by the environment movement and the public in general.

It is LFF's submission that the Act and the Renewable Energy (Electricity) Regulations 2001 should be amended to exclude wood from native forests from the definition of "wood waste".

4. Targets

The Federal Government's decision to implement a target of 2% increase in renewable energy by 2010 was a conservative approach to the stimulation of the renewable energy industry in this country. A number of other countries have given a much stronger commitment to their renewable energy industries. For example, it is estimated that the UK currently generates 3% of its electricity from renewable sources, with a target of 10% set for 2010. This target is consistent with the UK's obligation as a member of the EU, which has set a target of 22.1% of all electricity from renewable sources. As a part of the release of the UK Energy White Paper in February 2003, the government announced that the UK aimed to increase its 10% target to 20% by 2020. Denmark, another example of strategic commitment to the development of renewable energy, has a 12% target for renewable energy by 2003, 50% by 2030 and 100% by 2050.

LFF supports the proposal of peak environment groups and a broad cross section of the community, from the AMA to Tourism Industry Associations and Environment Business Australia, to increase the MRET from 2% to 10% by 2010.

LAWYERS FOR FORESTS
2 May 2003