



COMMENTS

National Greenhouse and Energy Reporting System

Discussion Paper - Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility-Level

February 2008

The National Association of Forest Industries (NAFI) appreciates the opportunity to provide brief comment to the Department of Climate Change on its *Discussion Paper - Technical Guidelines for the Estimation of Greenhouse Emissions and Energy at Facility-Level*.

NAFI is Australia's peak forest industry body representing the interests of the industry to the public, governments and authorities on matters relating to the national development and use of Australia's forests and wood products.

It should be noted that NAFI recently made a submission on the *NGER Regulations Discussion Paper*. NAFI's submission highlighted a comprehensive set of key issues for its members with respect to the proposed reporting framework and for further consideration by the Department in the development of the NGER Regulations.

Given the comprehensive set of issues already raised by NAFI on the NGER Regulations, there are no specific issues to raise in relation to the Technical Guidelines, other than the estimation and reporting of greenhouse emissions will have widespread implications across the forest industry.

NAFI represents a diverse range of forest industry companies who operate in all aspects of the industry's supply chain - including forest growing, harvesting and haulage, sawmilling, woodchipping and further timber processing, finishing and wholesaling. Therefore, the task of estimating and reporting the emissions from this comprehensive set of activities is likely to be extremely complex and diverse.

NAFI's members and the broader Australian forest industry consist of businesses ranging considerably in their size - from large publicly listed companies through to small private timber growers and family owned sawmills. Therefore, the capacity of forest industry participants to estimate and report on greenhouse emissions will vary considerably as will the level of cost and regulatory burden on these businesses.

In relation to the fuel types listed in Attachment A, it is anticipated that they provide sufficient detail for forest industry companies to adequately report on its fuel use. Similarly, for Attachment B, and data systems to facilitate reporting on the consumption of energy, it is anticipated that large forest industry companies (who are likely to trigger the reporting thresholds), have sufficient systems in place to facilitate the reporting of equipment in use for the consumption of energy. Also, if these companies are required to do so, it is anticipated that they will be able to estimate the breakdown of energy consumption by equipment type (e.g. boilers, kilns etc).

Notwithstanding this, it is still uncertain the level of capacity for smaller forest industry companies in meeting these reporting requirements. As such, ensuring that the process of estimating and reporting on emissions does not pose a significant burden on companies is a key priority for the forest industry. A reporting framework and accompanying technical guidelines that provide simplicity, equity and transparency will be a critical requirement for forest industry companies.

NAFI appreciates the opportunity to provide brief comment on this important Discussion Paper and would be willing to provide any additional information to the Department in relation to the development of Technical Guidelines for estimating and reporting on greenhouse emissions from the forest industry.