



## environment, forestry & fisheries

Department:  
Environment, Forestry and Fisheries  
REPUBLIC OF SOUTH AFRICA

	Annual production (Adu Poku, 2015)	S <sub>HWP</sub> with FLC96	S <sub>HWP</sub> without FLC96	Difference
Mill	pulp (t C/yr)	t CO <sub>2</sub> /yr		
Mill A	400 000	1 085 333	1 466 667	381 333
Mill B	300 000	814 000	1 100 000	286 000
Mill C	200 000	542 667	733 333	190 667
Mill D	100 000	271 333	366 667	95 333
Mill E	50 000	135 667	183 333	47 667
Mill F	20 000	54 267	73 333	19 067
Mill G	10 000	27 133	36 667	9 533
Mill H	2 000	5 427	7 333	1 907

The proposed interim accounting approach is to adopt the mass flow approach with the land fill approach to account emissions. However, it is strongly recommended that the 100-year approach should be implemented in future C tax periods as soon as industry specific studies are completed to derive suitable half-life, and product use period assumptions.

### A.8. Reporting of fertilisers and fires

Emissions from fertilisers and fires have been included in “S” as all emissions/removals from plantation activities need to be accounted for. However, the C Tax Act fully discounts emissions from biomass burning and fertilisation, therefore during this first tax phase these activities are only reported but not included in the accounting (i.e. not included in the calculated tax liability). The reason for continued reporting of these emissions is to collect company level baseline data so that these emissions can be excluded or included in the accounting in future. This reporting was also initially agreed by the forestry industry during a stakeholder meeting.

#### A.8.1. Fertilisers

*The forestry industry indicated that fertiliser emissions are insignificant and should not be included in the reporting. The rulebook states that emissions can be excluded from reporting and accounting if it is smaller than a significance threshold. The UNFCCC significance level is described as either an absolute size (500 kt CO<sub>2</sub>eq) or a fraction (<0.05%) of the absolute total emissions/removals. The absolute value of 500 kt CO<sub>2</sub>eq is only applicable at the national level, and C Tax is at the company level, therefore this absolute significance level was removed from the significance definition*