

Submission to:

Senate Environment and Communications Legislation Committee

on inquiry into:

Carbon Credits (Carbon Farming Initiative) Amendment Bill 2017

from:

Australian Wildlife Conservancy

AWC strongly supports the correction of earlier drafting errors in the Act, and making retrospective changes to the conditions imposed on existing projects because of the errors.

AWC also considers that other proposed changes listed below are essential if savanna carbon sequestration projects are to function effectively:

- **facilitate removal of parts of projects;**
- **correcting the definition of ‘net total number’;**
- **minor correction to clarify application of permanence obligations;**
- **facilitate savanna transfers between project types;**
- **facilitate savanna crediting options;**
- **facilitate removal of conditions after the end of the first reporting period.**

Basis for AWC’s submission

Australian Wildlife Conservancy (AWC) manages 26 properties, protecting endangered wildlife across more than 3.8 million hectares across Australia. AWC is a recognised national leader in savanna fire management, responsible for implementing the regional-scale, multi-property, multi-tenure ‘Ecofire’ project in the Kimberley since 2007, a regional fire project on Cape York Peninsula (‘Upper Mitchell River Catchment Regional Fire Program’), and property-level projects on AWC’s wildlife sanctuaries in the Northern Territory and north Queensland.

AWC’s fire management has reduced the incidence and impacts of wildfires and has made substantial reductions in greenhouse gas emissions. The costs of fire management operations are high, and income generated through carbon abatement contributes meaningfully towards delivering effective fire management programs.

Removing unintended consent requirements

We currently have six registered carbon abatement projects, but five of these are affected by the drafting error in the 2014 amendments to the Act that introduced unintended consent requirements for abatement projects. This has prevented us from receiving the carbon credits due to us on those projects for 2015 and 2016. Therefore it is not only important to correct the errors, but to make the corrections apply retrospectively to existing projects.

Other proposed changes

All of the other proposed changes are intended to ensure the appropriate number of carbon credits can be claimed for relevant fire management operations and to make variations to projects easier for the proponents. The process of setting up and reporting on abatement projects is already onerous, and it is important that the ability to claim for sequestration introduces as few extra difficulties as possible. We therefore support the other proposed changes.