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The Committee Secretary
House of Representatives Standing Committee on Climate Change, Environment and the Arts
PO Box 6021 Parliament House
CANBERRA ACT 2600
AUSTRALIA

13/4/11

Dear Secretary,

Submission from Humane Society International in regard to the Carbon Credits (Carbon Farming Initiative) Bill 2011

Humane Society International (HSI) is the global arm of The Humane Society of the United States (HSUS). The HSUS/HSI has approximately 10 million members. The Australian office was established in 1994 and with 40,000 supporters, concentrates on national and regional biodiversity conservation issues.

HSI strongly supports the proposed CFI legislation. We have a particular interest in ensuring that the maintenance of the natural carbon carrying capacity of landscapes through the protection and restoration of carbon stores in intact native vegetation is effectively covered in any relevant climate change policy and related legislation established by the Commonwealth Government.

Key aspects of HSI's views on the CFI proposal are contained in the attached submission of January 2011 to the Department of Climate Change and Energy Efficiency on its CFI Consultation Paper. We urge the Committee to consider the attached as part of HSI's views on the Bill because while some of our concerns and proposals have been incorporated in the Bill, others have not.

In this regard I have summarised below our main points in regard to the CFI concept and the Bill.

We are particularly pleased to see that the following matters are encompassed in the Bill:


- withdrawing native forest from logging;
- avoided deforestation and degradation of natural ecosystems and their restoration (but see comment below);
- safeguards for biodiversity;
- using native forest material to make biochar has been made explicitly ineligible; and,
- excluding the conversion of plantations established for timber into 'environmental plantings' or carbon stores.

Nevertheless it is important to emphasise the following in regard to the Bill:

- ensuring that the Bill's coverage of native forests includes any form of anthropogenic **degradation** of forests, including 'partial logging' as well as clearing and clear felling - or words to that effect - as a specific amendment.
- It would be preferable that the meaning of the Bill in relation to native forests should be expanded to a meaning that covers all types native vegetation as forms of vegetation other than forests, e.g. wetland vegetation, also have important biodiverse carbon storage benefits.
- It is a critical matter of principle that a credible accounting system is used to support any CFI Scheme. There is a clear and important choice to be made: to move on from the 'activity-based' accounting system currently used – and abused – to identify emissions within the LULUCF sector relevant to national emissions reduction targets established pursuant to the UNFCCC's Kyoto Protocol - to land-based accounting.
- The Bill should be clear that avoided loss or degradation of native vegetation and the restoration of native vegetation are Kyoto credits as these credits will be more valuable than non-Kyoto credits being tradeable in a future possible compliance market. This is important as maintenance or restoration of native vegetation has a number of critical co—benefits for Australia, apart from carbon. It will also ensure greater compatibility between the CFI, possible future carbon price compliance arrangements and international arrangements for green carbon credit trading such as international REDD + agreements.

I hope the Committee will give these proposals serious consideration. HSI would be happy to expand on these points both orally before the Committee or by way of a further more detailed written submission.

Yours sincerely,


Michael Kennedy
Campaign Director
Humane Society International