



REVIEW OF THE EMISSIONS REDUCTION FUND 2020: COVER SHEET FOR WRITTEN SUBMISSIONS

Contact Details

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Date of submission: 8 May 2020

Submission Instructions

The Authority encourages submissions from organisations and individuals on all issues relevant to this review by **20 May 2020**. We have identified key areas of focus in the consultation paper.

Your contributions are valued greatly by the Authority and will inform the Authority's final review report on the legislation, which is due by 31 December 2020.

The Authority will also talk to stakeholders to complement the written submissions.

Submissions can be made:

via email submission@climatechangeauthority.gov.au

via post Submissions
Climate Change Authority
GPO Box 787
Canberra ACT 2600

Contacts

Should you require further information about making a submission please contact the Authority on freecall 1800 475 869 or via email at submission@climatechangeauthority.gov.au.

Confidentiality and publication

Your submission may be published.

Submissions not marked as confidential may be published on the Climate Change Authority's website. The Authority welcomes submissions made in a respectful manner and while the Authority values public consultation highly and seeks to be transparent, it is under no obligation to publish submissions it receives and reserves the right not to publish submissions on its website that raise legal or other concerns.

For submissions made by individuals, all personal details other than your name and the state or territory in which you reside will be removed from your submission before it is published.

Please do not include information about third parties of a private nature unless you have permission to do so.

If any part of a submission should be treated as confidential, please provide two versions of the submission, one with the confidential information removed for publication. If you choose not to use this cover sheet and wish your submission to remain confidential then the document should be clearly marked as confidential.

Do you want this submission to be treated as confidential? Yes No

Do you understand the information provided about confidentiality and publication?

Yes No

Signature of submitter:



Date: 7/5/20

Climate Change Authority
GPO Box 787
Canberra ACT 2600

7 May 2020

Consultation open for 2020 Review of the Emissions Reduction Fund

Thank-you for this opportunity to make a submission to the Climate Change Authority.

Country Carbon is the largest project developer of savanna burning projects in Australia. Savanna burning carbon projects have been very successful in reducing late season hot fires and creating abatement in Northern Australia. The overall programme has opportunity for improvement in some key areas. We would like to make four key recommendations as part of the review of the Emissions Reduction Fund.

Maintain Offsets Integrity Standards.

Country Carbon supports the integrity standards maintained by the Emissions Reduction Assurance Committee. The standards need to remain high and backed by science to provide confidence to participants in the Emissions Reduction Fund.

If a method changes then the revised abatement should be reflected as soon as possible. If a project is negatively impacted by lower abatement, then the ERF contracted amount should be lowered rather than a participant suffer market damages from the CER for a contract shortfall because the method changed. It is paramount that the crediting maintain offsets integrity whilst remaining fair to contracted parties.

Support the Science of Savanna Burning

Continue to support the science of savanna burning as this will unlock significant abatement by simply upgrading from emissions avoidance to both emissions avoidance and sequestration. Savanna sequestration methods at present need to be updated with the latest research on carbon sequestration. We wish to see the methods abatement updated as soon as possible as it delivers immediate benefits to both indigenous groups and graziers.

We also wish to see the tools of the savanna burning SAVBAT tools well- funded by the Commonwealth both for fire detection and calculating abatement.

Support Participation with Indigenous Communities

Country Carbon has significant experience with indigenous involvement in savanna projects in Cape York on pastoral lands. We have successfully negotiated agreements with the Wik people and Kowanyama people for sharing carbon royalties with support of Balkanu and the Cape York Land Council.

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CARBON CREDIT STOCK AGENTS

We would like to see government support for on-going negotiation of Indigenous Land Use Agreements as they will provide benefits to both graziers and indigenous people. We also strongly support programmes bringing people back young indigenous people back country for savanna burning for the fire season and it can align both interests of indigenous groups and graziers.

We also support the work of Victor Steffensen in particular and believe that farmers are strongly interested in indigenous fire management in the areas across all of Australia, not only those with carbon projects but also those impacted by the terrible bushfires of 2019-20 summer.

Northern Territory Savanna Sequestration

We are currently awaiting the Northern Territory government to allow carbon sequestration rights to be established on leasehold land. We have multiple carbon projects that have obtained Eligible Interest Consents for savanna sequestration but are delayed due to regularly delays in the NT with Ministerial Consent. Such rights are already provided in Queensland and for savanna sequestration projects.

These are our main recommendations for the Climate Change Authority.

Kind regards,

Nicholas Cameron

Managing Director

Country Carbon

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