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Committee Secretary Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
Canberra ACT 2600

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CFI Amendment Bill Submission

Dear Sir/Madam,

We have carbon projects in Cape York that involved early season fire management by landholders that have reduced emissions but have not been given ACCUs because the existing CFI legislation only allows 3 months to report and audit a savanna burning carbon project. This means the emission reduction is achieved, the emissions verified by a third-party auditor but the Clean Energy Regulator will not issue credits because the legislation only allows us three months to submit a report from the end of the crediting period. This problem affects more than 10 cattle stations in Cape York right now.

Given that the crediting period for savanna burning projects is Jan-Dec each year, it meant that project proponents have only from 1st Jan to 31st March each year to submit an audited offsets report. This year this was not possible because the main tools to generate reports from the Northern Australia Fire Information service (SAVBAT) were not working until mid-February and the auditors take about 6 weeks to audit a project. The reports are only available after the reporting deadline due to factors outside the control of Cape York landholders. The end result is that although we have achieved abatement on these carbon projects, no credits will be issued due these restrictive rules on reporting imposed by the existing legislation. This is regardless of paying for costly third-party CFI audits and meeting all other CFI requirements.

We would like to see the time allowed to submit a report changed to 12 months from the end of a crediting period in the CFI Amendment Bill (instead of the current 3 months). This would allow landholders to receive payment in ACCUs for audited projects that reduce emissions in Australia's Far North.

Yours sincerely,

Nicholas Cameron
Director of Country Carbon