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Submission regarding the Carbon Farming Initiative legislation

From Paul Dettmann – Managing Director Greenhouse Balanced

- The Carbon Farming Initiative should seek to encourage carbon plantings which integrate multiple environmental outcomes (biodiversity, water quality, landscape connectivity).
- The initiative could consider establishing 'priority areas' for carbon plantings where landscape-scale revegetation projects would deliver significant benefits (ie salinity mitigation, Connecting National Parks).
- Australia needs a credible mechanism for recognising forest sink abatement to stimulate investment in our landscape and to overcome the 'carbon trading deficit' currently imposed under the rules.
- Dismantling previous schemes such as Greenhouse Friendly™ and the failure of the Carbon Pollution Reduction Scheme have created significant market uncertainty and has stymied investment in Australian abatement.
- Projects and methodologies approved under previous schemes should be accepted and transitioned into the CFI.
- Abatement from all projects should only be counted once.
- Eligible projects' abatement is recognised from the commencement of the Kyoto period (2008) to prevent double counting by the Australian Government.
- The proposed sections to impose automatic cancellation on voluntary abatement are unworkable.
- Amend Part 2, Division 3, Section 19(2)(c) and Section 27 (3)(e) to allow voluntary retirement of carbon credits from eligible projects.
- Let the ACCC fulfil its duties to ensure that offset agencies neither double-count abatement nor make false claims regarding their projects.
- Approval of forestry projects, particularly those under 50 hectares should not require additional levels of Government approval, as the administrative delays will act as a significant barrier to participation in the CFI. Existing approval regimes should remain.
- Natural resource agencies should not have the power to veto projects where they have a direct or perceived conflict of interest in the project's approval.
- There is unlikely to be a huge flood of CFI credits into the market in the short to medium term.
- Forests are unlikely to displace food production on productive agricultural land, (but would definitely not if priority areas were established)
- If there were a flood of credits onto the market, emission reduction targets can be adjusted accordingly.