Submission 019
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GOULBURN BROKEN CATCHMENT MANAGEMENT AUTHORITY

ABN 89 184 039 725

12<sup>th</sup> April 2011

Standing Committee on Climate Change, Environment and the Arts PO Box 6021 Parliament House Canberra, ACT 2600

To whom it concern,

Re: Goulburn Broken Catchment Management Authority response to the House of Representatives inquiry into Carbon Credits (Carbon Farming Initiative) Bill 2011.

On behalf of the Goulburn Broken Catchment Management Authority (CMA), we would like to voice our concerns over the issue of permanency in the proposed Bill.

The permanency obligation of 100 years may not be considered global best practice, further investigation into a risk based approach maybe more appropriate and could result in greater uptake of the Carbon Farming Initiative (CFI) from landholders.

The requirement of 100 year permanency will significantly impact the uptake of the CFI by the landholders in the Goulburn Broken region, it is unlikely landholders will commit to this timeframe. We would also encourage that the crediting and contract period be more closely aligned.

The Goulburn Broken CMA believes that the permanency obligation (100 years) will greatly affect future based decision making on farming enterprises. There appears to be a growing body of evidence suggesting that an increase in the crediting period would potentially improve landholder's interest and uptake in the scheme. This would result in the CFI achieving its principles of ensuring environmental integrity and enabling broad participation, ultimately having a positive impact on carbon sequestration and the implementation of sustainable farm practices.

Yours sincerely,

**Chris Norman**Chief Executive Officer

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