



14 December 2012

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

Senate inquiry into the effectiveness of threatened species and ecological communities' protection in Australia

Greenfleet is a non-government organisation that plants native vegetation communities on otherwise under-used land for the dual purpose of creating carbon credits and establishing biodiverse habitat for wildlife conservation purposes. The creation and subsequent sale of carbon credits funds the revegetation activities.

Since 1997, Greenfleet has planted over seven million trees over 7,300 hectares in all states of Australia on both Crown (national parks, nature reserves and other protected areas) and freehold land either owned by Greenfleet or by third-parties including farmers, grazers, local governments, and other landholders.

In identifying and selecting land for the establishment of biodiverse carbon forests, Greenfleet aims to work with both government and non-government organisations involved in wildlife and conservation protection and management to ensure our broader conservation goals are met. And while these efforts have had some limited success, the bigger potential of bringing private investment in carbon credits to national ecological protection goals remains largely unfulfilled.

Greenfleet is uniquely positioned to bring private sector investment to habitat restoration and species protection helping to augment existing investment by the public sector. To illustrate this point, Greenfleet has recently purchased a property of 1,700 hectares near West Wyalong in south-west NSW to sow to native vegetation in 2013. The property was purchased using private sector investment in the voluntary carbon market. Greenfleet selected the property as it contains a critically endangered ecological community listed under the *Threatened Species Conservation Act* (NSW) including a Blue Mallee-Bull Mallee-Green Mallee vegetation community that is not currently represented in the protected area estate in NSW.

The vegetation communities on the property support a number of vulnerable and endangered species listed by the *Environmental Protection and Biodiversity Conservation Act* (Cth) and the *Threatened Species Conservation Act* including the Malleefowl (*Leipoa ocellata*) and Bush Stone Curlew (*Burhinus grallarius*) among others. The native vegetation on the property will be secured through carbon sequestration rights on land title and the property borders the Buddigower State Forest that extends the protected area delivering the necessary scale to ensure species conservation. All of this work and investment has been undertaken without the imprimatur of the agencies tasked with species and habitat protection and restoration notwithstanding Greenfleet's regular efforts for greater engagement and coordination of this work.



The carbon market has been heralded as a mechanism by which private sector funds can be accessed to fund biodiverse revegetation works by generating carbon credits under the Carbon Farming Initiative (CFI). We note however, the following failures at both Federal and State Government levels which compromise optimising the market's potential to restore biodiverse communities.

1. The Department of Climate Change & Energy Efficiency (DCCEE) did not mandate that a biodiverse mixture of only local species can be used to generate carbon credits (as is the case under the Californian scheme) and have thus allowed vast areas of land to be planted under monoculture – a missed opportunity to restore permanent ecological communities.
2. DCCEE has not included biodiverse revegetation works within Australia's conservation reserves (including National parks) in the Positive List¹ on the premise that they *might* occur anyway. Greenfleet has extensive experience in dealing with National Park agencies across several states and we are confident that the funding we brought was the only funding for large scale revegetation works in those states for several years – ie it is not common practice². Excluding conservation reserves from the Positive List creates an extra barrier for undertaking biodiverse plantings in areas already recognised as high priority and again represents as missed opportunity to restore permanent ecological communities.
3. Carbon sequestration rights (ie rights to carbon on land) are property rights controlled by the States. By and large, state governments have failed to keep relevant legislation up to date such that CSR can be recognised on conservation reserves owned by the Crown. This failure to update legislation has happened despite there being active federal debate on the implementation of a compliance carbon market for at least the last 6 years.

Only Victoria and WA have legislation in place that allows the CSR to be recognised on crown land or in National Parks. Despite the Victorian Climate Change Act's passage in 2010, which allows CSR to be recognised on Crown Land, to date no agreement nor policy statement regarding implementing this aspect of the legislation has been made.

In other states, such as NSW legislation does not allow for recognition of CSR in National Parks or crown land. We have brought this issue to the attention of the relevant state agencies for several years however there is no tangible progress to make sure that the potential to access the carbon market to undertake biodiverse revegetation projects is realised.

Greenfleet remains committed to establishing permanent biodiverse forests as carbon sinks and looks to work with government agencies across both state and federal agencies however, we remain frustrated by slow progress in ensuring that the opportunity to access private funds for public conservation and the benefits that laying the basis for additional habitat in areas of high priority can bring.

¹ The Positive List streamlines tests of additionality by identifying activities that are deemed to go beyond common practice in the relevant industry or environment.

² The Biodiversity Fund brought federally funded grants to the several national parks in 2012 but we note that state contributions towards revegetation works in national parks are very limited.



We strongly believe the effectiveness of threatened species and ecological communities' protection in Australia could be greatly improved through coordination of effort with organisations such as Greenfleet. Greenfleet stands ready to make its next land purchase and habitat restoration program that targets a specific endangered species or community, but first needs the cooperation and engagement with the regulatory agencies to ensure this occurs. Alternatively Greenfleet will direct funds to conservation reserves in need of revegetation however Greenfleet will need appropriate policy instruments at both state and federal government levels for this to happen.

In short Greenfleet would value a more holistic approach by governments at both federal and state levels where the collateral benefits of policy approach are maximised through co-ordinated and strategic effort across multiple departments as well as federal and state boundaries.

Greenfleet sees an urgent need to remedy the lack of coordination and make the linkages between policy-makers in government and agencies such as ours involved directly in habitat restoration. We need to ensure our work is targeted, sits within the national conservation policy goals, and achieves national conservation benefits at least cost to the taxpayer.

Yours sincerely

Sara Gipton | CEO