



TRUST FOR NATURE

19 September 2017

Submissions
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Review of the Carbon Farming Initiative legislation and the Emissions Reduction Fund

Thank you for the opportunity to respond to this consultation. Trust for Nature has participated in two previous consultations on this issue, the Climate Change Authority's *Action on the land: reducing emissions, conserving natural capital and improving farm profitability* issues paper and the Department of the Environment and Energy's 2017 Review of Australia's climate change policies. Rather than repeating ourselves, we enclose a copy of our submission to the latter review.

The submission primarily addresses the adequacy of the coverage of existing methods and provides feedback in relation to the design of the ERF.

We make a number of key points, as follows:

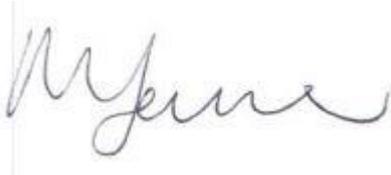
1. Trust for Nature stewards vast carbon stores for the public good, and is achieving significant carbon benefits through its many and varied projects, yet is frustrated by the extremely limited opportunities to have those carbon benefits recognised through the existing climate change policy framework. We recommend that consideration be given to introducing an alternative modelling approach that better recognises the carbon carrying capacity of intact native forests.
2. There is a strong body of scientific evidence that the most effective climate mitigation action in the forest sector is to protect intact native forest carbon stocks, followed by restoration of degraded native forest carbon stocks, followed by restoration plantings. While existing forests may not sequester carbon at the same rate as new forests, the many other benefits that protection of such forests provides (such as climate change resilience, biodiversity, and connectivity) justify careful consideration of a revised approach.
3. While state-based native vegetation clearing laws go some way to preventing clearing of these forests in theory, they are neither secure (these regulations can be weakened or abolished at any time), nor do they provide incentives or resources to actively maintain and restore native vegetation on private land.
4. We acknowledge that additionality issues arise from including carbon captured in existing forests, yet given their value from a carbon perspective we believe that more policy attention should be given to recognising and rewarding that value.

5. Alternatively, additionality requirements could be satisfied if a new method recognised conservation covenants entered into in the future, which protect native remnant vegetation on private land. This would incentivise action by a new group of private landholders to maintain and restore native vegetation in perpetuity.

6. If the objectives of the climate change policy framework was broadened to include objectives other than lowest cost carbon abatement, and to recognise the multiple values provided by intact forest protection, many more land sector projects could be brought into the climate mitigation fold. We consider that this approach could be widely relevant, with the potential to achieve significant additional ecosystem services – including climate regulation, erosion control, biodiversity protection, waste treatment and moderation of extreme events.

Thank you for considering our submission. Please don't hesitate to be in touch if you require further information.

Kind regards,

A handwritten signature in black ink, appearing to read 'Marnie Lassen', is positioned above the typed name and contact information.

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