



Submission Template

Positive and Negative Lists for the Carbon Farming Initiative

Overview

This submission template should be used to provide comments on the Positive and Negative Lists for the Carbon Farming Initiative.

Contact Details

Name of Organisation:	Australian Landcare Council
Name of Author:	
Phone Number:	02 6272 5911
Email:	alcsecretariat@daff.gov.au
Website:	
Date:	

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A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential? Yes No

Submission Instructions

Submissions should be made by **30 June 2011**. The Department reserves the right not to consider late submissions.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – CFI@climatechange.gov.au.

Submissions may alternatively be sent to the postal address below to arrive by the due date.

Land Sector Policy Section, Land Division
Department of Climate Change and Energy Efficiency
GPO Box 854
CANBERRA ACT 2601

Format of the lists

While the Australian Landcare Council supports the standardised or positive list approach, the council feels that the lists in their current form do not adequately allow activities to be considered by landholders.

The council suggests that the simplistic style of the list could be replaced with a list of activities each accompanied by a case study. This would allow landholders to gain clarity about what and how the activity works in practice.

Process for nominating

The Australian Landcare Council believe that the consultation paper does not clearly describe the process for nominating methodologies and subsequently activities to the positive and negative lists (figure 2).

Council stresses the need for more information regarding, nomination, methodologies and their assessment as it prevents landholders understanding the process and engaging with the concept, and will therefore have impact on uptake.

The nomination process needs to be simple and well defined. The council failed to see the difference between 'Public, NRM organisations, local governments, state and territory governments and experts' currently listed as groups invited to comment and the methodology developers as per figure 2 of the consultation paper. To this end, there is lack of clarity around the role of the methodology development organisations and the groups invited to comment. Council believes that the process of assessing or developing methodologies used to add activities to the positive and negative lists needs to be more transparent. Further guidance on how methodologies are commented upon is also needed.

The council also feel that the definition of common practice and additionality are not clearly defined. The council support the "apples to be compared with apples" approach. However, if the Carbon Farming Initiative (CFI) is to use a Common Practice Test as the basis for identifying additional activities, the term 'common practice' and what practices are over and above 'common practice' needs to be defined.

Council wishes the government to note that common practice varies across regions and industry. Some regions are very innovative and common practice in these regions is not comparable to other regions.

Council notes that government recognises that some practices, whilst they may be best practice are not necessarily common practice. For example planting trees for shelter or implementation of no-till farming practices is an accepted best practice but is it common practice? Council suggests that a percentage approach could be used to determine if an activity is common practice i.e. 50 per cent of land managers use a particular practice.

Council feel that the timeframe of the process for nominating should also be more transparent. An overly complex nominating and assessment process could result in a lack of landholder interest and engagement. For example, the requirement for ministerial sign-off could cause delays due to bureaucratic processes or political issues. Conversely, a rigid process which disregards activities too quickly may also cause disinterest and lack of engagement.

Council stress the need for consistency in the process and note that the suggested 40 day period of public scrutiny for methodologies has already not been adhered to with submissions for the proposed 'Manure Management' methodology due in less than 40 days.

Suggestions for the Positive List

To encourage uptake of the Carbon Farming Initiative (CFI) the Australian Landcare Council feel that the initial Positive List will need to include a large number of activities in order to encourage uptake. A wider range of activities on the list would provide more opportunity to participate. The expertise of those organisations which support the farming community for example consultants, research groups and government could be utilised to increase the list and drive early uptake.

Uptake would also be assisted through the use of examples or prototypes which would help people to understand the process and gauge how and if an activity would qualify. These prototypes could also be used to expedite the approval process for activities with the same methodology.

Council suggest that there is a risk in waiting for activities to be nominated is that these activities are more likely to be from organisations which are sufficiently resourced and may not be an activity that a farmer could easily do or achieve.

The council recommends Department of Climate Change and Energy Efficiency/Domestic Offset Integrity Committee commission work for prototype projects/activities and run these past an expert panel. The prototypes would need to take into account a range of regions and industry sectors. This proactive approach would greatly assist landholders.

Many of the examples used in the *Illustrative Example of the Positive List – Additional Activities* do not have sufficient baseline data and/or are in the research and development phase. For example fermentation and savannah burning are both still in the research and development phase. Council suggest that it would be prudent to ensure that activities listed on the lists are able to be measured.

Council also suggest further detail needs to be given in terms of how the lists integrate with other Australian Government funded activities. Council notes that activities such as culling feral camels and environmental plantings are already funded by the government in some instances. What implications would this have for their listing and for people to use these activities if they are being funded or have been funded?

Suggestions for the Negative List

Council's comments on the format of the lists applies to this section.

Any further comments

The Australian Landcare Council is supportive of the standardised or positive list approach. However, council feel that there are still gaps which need to be addressed to provide people with sufficient information and certainty and to encourage uptake of the Carbon Farming Initiative. While council can appreciate the complexity of this issue, the consultation paper was not very targeted due to the effort to simplify it.

The council also feel more work needs to go into demonstrating what the CFI can do for landholders and how they can be involved. The provision of examples would be a good way to approach this.