



NRM Regions Australia Submission to the Clean Energy Regulator's consultation paper – Streamlining the Emissions Reduction Fund – Environmental Plantings Pilot

Thank you for the opportunity to respond to the Clean Energy Regulator's consultation paper: Streamlining the Emissions Reduction Fund – Environmental Plantings Pilot

NRM Regions Australia is the national representative body of Australia's 54 regional NRM organisations. Our members cover all of Australia and are major partners in the delivery of the Australian Government's National Landcare Programme. Depending upon the jurisdiction within which our members operate, they also deliver NRM programs for State and Territory governments

NRM Regions Australia welcomes the proposal to pilot a streamlined version of the ERF for smaller, low risk environmental plantings projects and we thank you for your responsiveness to our earlier feedback on this matter. These measures will undoubtedly increase the opportunity for land managers to participate in the scheme, increasing the sequestration potential across the land sector, and we are pleased that this advice is being implemented in this practical way.

This pilot project appears designed to enable farmers to participate directly in the scheme, saving them the costs associated with the involvement of third-party project developers. However, many landholders are still likely to seek support to plan carbon projects prior to engagement with CER. This is likely to lead to increased requests for support by NRM regional organisations, as farmers seek the advice of trusted independent professionals – a role played by NRM regional staff all over Australia. This would be a desirable outcome – NRM regional organisations have the knowledge, skills and networks to fill this gap.

Six regional NRM organisations were recently funded to support landholders to participate in the Australian Government's Agricultural Stewardship project – the Carbon plus Biodiversity project. This project demonstrated the contribution that the skills and networks of regional NRM organisations can make in encouraging participation in carbon farming – we expect the project to more than double the number of active ERF projects utilising the environmental plantings method. In recognition of their valuable contribution, these six regional NRM organisations have been selected to support roll-out of the next round of Agricultural Stewardship projects.

Involvement of regional NRM organisations may also improve biodiversity outcomes. It is noted that the environmental plantings method requirements fall short of the guidelines

that are commonly adopted for biodiversity plantings. For example, biodiversity planting projects typically encourage plantings that build on existing vegetation in a landscape, whereas the legislation for carbon farming projects requires exclusion of existing remnant vegetation from planting areas (carbon estimation areas). Thus, planning a carbon farming project that could include a few paddock trees is much more complex than planning a planting in a completely cleared area, which will have lower biodiversity values. Involving regional NRM organisations will allow farmers to access advice on how to maximise the co-benefits from environmental plantings projects, in line with regional NRM plan goals.

While increased participation of NRM regional organisations in carbon farming has been shown to lead to increased participation, and will support better on-ground and community wide outcomes, in most cases, NRM organisations are not resourced to participate in projects in this way. Funding to support regional NRM organisations to play this important role during the pilot would be welcomed.

In addition to funding regional NRM organisations to support roll-out of the pilot, it is also recommended that the legislation for the environmental plantings method is amended to support in-fill or supplementary planting in areas of land that contain remnant vegetation and woody debris. As described above, the current method incentivises plantings in areas with no existing trees, and excludes areas that contain woody biomass, such as standing dead timber and logs. These conditions will necessarily rule out many areas that farmers might ordinarily prioritise for plantings, and could also undermine on-farm biodiversity by incentivising clearing of woody debris that has high habitat value for many animal and bird species. Changing the method to enable planting in areas of existing living and dead vegetation would be likely to increase both participation and biodiversity benefits, as farmers seek to undertake plantings on areas that are both less agriculturally productive, and that provide better habitat value e.g., hilly areas with some older, existing trees and dead timber. The AL-MAP method proposal that is currently being considered by DISER for prioritisation accommodates in-fill planting.

Therefore, NRM Regions Australia recommends the following:

1. Funding for NRM regional organisations to assist farmers to understand and access the ERF through this pilot.
2. A method alteration that would allow/encourage environmental plantings to occur in areas with some remnant vegetation and woody biomass to increase uptake and improve biodiversity outcomes.

Thank you again for the opportunity to provide a submission on Streamlining the Emissions Reduction Fund – Environmental Plantings Project. If you have any questions about our submission or would like to discuss, please contact NRM Regions Australia CEO Dr Kate Andrews: 0403 604 823