5 June 2020

To: Climate Change Authority

2020 Submission on Emissions Reduction Fund

Regional NRM organisations have been involved in the emerging carbon economy since prior to the creation of the Carbon Farming Initiative. The role of the land sector in providing emissions reductions and sequestration while increasing farm profitability has long been recognised; land sector participation in the Emissions Reduction Fund demonstrates the potential that exists. It has also revealed gaps, issues and concerns. We can learn from these and improve the existing framework to drive greater opportunity and integrity while managing risk.

Additionally, the current arrangements do not take full advantage of the enabling role that regional NRM bodies can play in increasing abatement, capturing co-benefits, and minimising perverse outcomes. Regional NRM organisations support the land sector across Australia and are well placed to:

- identify and prioritise potential supply across the landscape
- build supplier/land manager capacity to participate
- increase participation in the ERF and abatement generally
- improve risk management for projects and the 'market'
- increase efficiencies
- reduce potential negative production, social and environmental impacts
- incorporate many additional biodiversity and wellbeing benefits

Regional NRM organisations are uniquely placed to provide services to increase carbon abatement in the land sector as they –

- Cover the entire continent
- Have longstanding extensive networks with land managers/suppliers
- Work across all land-uses and agricultural industries
- Work across conservation, production and social outcomes
- Have well established program, financial management and accountability systems underpinned by strong governance
- Each have a regional NRM plan or strategy developed with their communities, and underpinned by science and policy
- Have demonstrated ability to catalyse innovation and facilitate adaptation
- Have existing contracts in place with the Australian Government through the Regional Land Partnerships, to which additional work orders can be readily added

Currently activities designed to increase participation and seek landholder input are focussed on the role that project developers play in the market. This excludes the majority of land managers across Australia. Utilising regional NRM organisations can provide a direct and trusted link to land managers and support increased participation. Substantial further opportunities exist within the land sector.

The following section addresses topics in the CAA discussion paper.

4 Maintaining Integrity and Optimising Governance of the ERF

Crediting genuine, additional abatement

Processes

There are processes within the current ERF design that incrementally increase project complexity, cost and period for financial return. These impact on the financial viability and reduce participation in the program.

There is a need to reduce the payback period on projects that have long lead in times and reporting periods. Introducing processes that provide for estimated returns at project start up (with a process for validating the actual reductions or sequestration within the project life) and the early issuance of ACCU's will support landholders establish projects (such as soil carbon and herd improvement projects) that require greater financial input at establishment and have a longer period of return.

Additionality

It is timely to consider the application of additionality provisions, particularly in consideration of recent recommendations to provide the opportunity for 'below baseline crediting arrangements'. NRM Regions Australia supports the ongoing requirement for regulatory additionally.

The newness criteria has always been perceived by some land managers as being a disincentive for those that are already delivering substantial benefits through leading land management practices or implementing new activities prior to a suitable method being created. Unlike other sectors of the economy, determining vegetation based land management outcomes can be done with clear evidence of standard outcomes across multiple enterprises. This can be easily achieved using remote sensing tools, that allow for changed vegetation types and seasonal conditions. In this way a 'baseline' or business as usual can be developed at an industry wide scale rather than at an individual manager scale. This approach to establishing a 'baseline' provides an outcome measure, rather than an input measure (as was previously the case with the 'common practice test' within the CFI).

The requirement for records demonstrating the actual changes in practice implementation and the intent of reducing emissions, may also enable producers to implement change, prior to methods being developed. Delays in implementation can be reduced by method development and implementation that recognises the drivers of practice change and provide for recognition of prior activities. Regional NRM organisations can play a strong role in assisting landholders to understand what data records they need to retain to participate in the ERF and how they can maintain them.

Governance to Support a mature ERF

Maintaining Market Integrity – 'Ombudsman' role

A critical factor for consideration with the development of the Climate Solutions Fund is the opportunity to maintain market integrity not just to increase emissions reductions. The early days of the Carbon Farming Initiative and then the Emissions Reduction Fund has meant that some projects have been created with little input or understanding of the actual land manager or producer. Unfortunately, there are already a number of instances where land managers engaged in the ERF are suffering the consequences of inappropriate contracts or lack of accountability by project developers. These cases have been highlighted in media reports and in some instances resulted in community division.

A robust mechanism is needed to avoid the increasing the number of failed projects and to reduce the number of participants with unintended negative consequences. Such projects will reduce participants, lead to a loss of confidence of demand side partners and impact on the general confidence in the system.

At this point there is nowhere project participants can go for independent guidance, help or mediation. There is a clear need for a resourced independent contact point who will provide advice and follow-up these cases. This 'ombudsman' role could work hand in hand with initiatives such as the market industry code of practice developed by the Carbon Market Institute and the regulator, to ensure market integrity and social support for the climate solutions fund is maintained.

Role Recognition and Streamlining Processes

There is limited formal recognition of the role of the actual ACCU producers, within the market. Currently when the regulator, and government agencies, seek the views of the industry, landholders are not engaged in the process. The discussion paper for this review highlights this disconnect by identifying the 'Roles in the ERF' and does not include the Industry or producers. Currently the majority of land managers do not effectively understand the governance structures for the market and this increases the level of scepticism and reduces further uptake and participation. Mechanisms to include producers in the discussion, beyond asking project developers, need to be developed and implemented. By providing clarity producers can become informed participants in the market will increase market integrity, provide long term stability through reducing unintended negative outcomes and provide a critical risk management approach for emissions abatement.

Streamlining processes and the provision of clear guidance information will increase the level of support available for participants and in some cases may lead to individual landholders being able to participate without the need for a project developer. Previous reviews and discussions by the Climate Change Authority the CER and Department have identified opportunities for improvement and the recommendations from these reviews should be implemented and progress towards implementation should be communicated publicly At a very operational level a full-systems review of ERF processes should be undertaken to identify unnecessary and repeated steps within the processes.

Method development Process

The ongoing difficulties in developing practical useable methods is a significant impediment to increasing abatement. The current process for prioritisation is opaque and appears to be based more on what science is available, but lacks the fundamental test of whether the method is for an activity that entities will actually implement.

A participatory process to identify opportunities for method development will improve prioritisation and adoptability of methods. Reframing the method development process so that the prioritisation process starts with discussions with producers, will support the development of methods that people will implement. Furthermore, improvements in the process for development of methods and early participation by land managers and regional NRM organisations will test the on-ground applicability of that method during development. The current focus on scientific validity is critically important to maintain market integrity, however the current system prioritises scientific integrity over the development of practical methods. There is a clear need for greater understanding that there is a role for generating and testing ideas for development. This need continues through the development process, with the need for road testing adoptability of methods (relevance, cost, alignment to business or farming system, risk) and testing the applicability at a regional scale.

Methods that encourage reduced inputs and a more sustainable systems approach to agriculture are needed. Current methods are issue specific and do not take into account the complexity of the natural systems nor the complexity of issues that land managers must take into account when planning and implementing activities. A 'Whole of Farm' method that enables small scale participation or improve ERF processes to enable 'stacking' of methods will assist in linking the outcomes of productivity, profitability and atmospheric GHG reductions. Current discussions regarding stacking are focussing on removing regulatory restrictions on implementing multiple methods, and reducing the burden of overlapping auditing and verification requirements. However, this approach is missing a significant opportunity to redesign methods so that they can be implemented in a much more efficient manner. Developing methods with a standardised approach could enable creating new project approaches utilising 'modules' from multiple methods, to cater for the complexity of modern agricultural production systems. For example, developing a carbon project for your enterprise, could include the shelter belt module, grazing land change module and livestock supplement module, with each module being selected from the larger Farm forestry, Soil carbon and Herd improvement methods, respectively.

Linking of ACCUs to the upcoming biodiversity certification scheme is required to enable synergies between the two. Project participants could be eligible to generate both carbon and biodiversity credits on the one property having the potential to provide an overall cost reduction in the implementation of practices by the project participant and the cost of paying for the credits by the Australian Government.

The complexity of the methods means that many market participants have little or no understanding of the project requirements. This lack of understanding creates a power imbalance within the market place and disempowers the actual producers. The production of simpler guides / instructions for methods, while maintaining required the scientific validity will enable fully informed participation. Reducing the complexity of information will empower land managers that are not currently comfortable with the power imbalance between producers and support services, that is created by the current system. Increasing understanding of

the requirements of the projects will increase the ability of land managers to make informed decisions and increase participation, while maintaining market integrity by reducing the potential for project failure.

5 Managing Risks to Abatement; and 6 Opportunities for Enhancing Outcomes

Managing the risks to abatement occurs at multiple levels within the ERF. Previous activities to update Regional NRM plans to ensure they were carbon economy and climate change ready, was recognition of this need, at a time when the legislative link between the CFI and regional NRM plans was stronger. The most recent droughts and fire season highlights that the 5% risk of reversal buffer will become increasingly inadequate and the almost total shift from a 100 year to 25 year permanence period by project proponents, would indicate that the market views the permanence period discount as being very good value when compared to the increased 20% return or an additional 75 years of permanence obligation. Any changes to the risk of reversal buffer and the permanence period discount will reduce returns and are likely to impact on project viability and reduce participation. This impact can be offset by increased ACCU value or could be managed by the introduction of a premium (whether it be in the number of ACCU's issued or the price paid) for those projects that can demonstrate a reduced risk or elect the longer permanence period, or provide additional benefits and increase natural capital value beyond pure carbon sequestration

The opportunities for enhancing outcomes have been recognised since prior to the commencement of the CFI and the need to move from a policy catchcry of 'lowest cost abatement' to an approach that realises across portfolio benefits providing the 'highest value abatement', is clearly needed. There are numerous interrelated activities and approaches that will combine to manage risk and enhance the outcomes of the ERF and some are outlined below.

Improved Climate Resilience

Climate resilience is needed at the ERF level but also critically, at the enterprise level. Supporting the development of methods that will enable greater geographic and bioregional spread of projects will reduce the overall risk of abatement losses due to localised climatic conditions and related events, but enhanced enterprise level resilience is needed to address the impacts of widespread events such as cross jurisdictional and nation-wide droughts.

The current concentration of vegetation projects in south west Qld and western NSW, can be addressed by developing a non-forest or rangelands method, that can be applied more broadly across the Australian landscape. This will reduce the increasing climate change risk through diversifying the locations for the offsets projects that are currently providing the majority of Australia's emissions abatement.

Improving individual enterprise resilience will be critical in managing the risks to abatement at the project level. Land managers are generally managing complex businesses with many interrelated activities that result in changes across the production system. ACCU's are one commodity, within the considerations and the enterprise resilience and viability has the potential to impact on ACCU production just as it impacts on other commodities. Providing a program of support to improve enterprise resilience for land managers participating in the ERF, will target risk reduction activities directly where ACCU generation occurs and will provide an incentive for greater participation and increase the capacity of people participating in the market.

Independent advice, support, and capacity building for land managers

The provision of dedicated independent support mechanisms for landholders to engage in the carbon market is required; a role that is core business for regional organisations with other issues, and for some in carbon. Currently, the knowledge and activity in the carbon economy is quite immature in a market sense. There is a lack of independent non-biased advisers to assist landholders who are often not yet aware they could benefit from independent technical advice including the science and administrative process. Instead they are relying totally on the advice of carbon project developers, who's drivers may not match the land managers' needs. Building informed capacity will increase participation in the market and strengthen the reliability of the outcomes. This could be delivered by groups such as regional NRM bodies. It is critical those providing support are demonstrably independent. The introduction of a mechanism to provide an introductory level of participation for landholders would also support engagement and capacity to deliver credits in the future.

Independent support services for new and existing participants would lead to increased participation and improved delivery of current projects. This needs to go beyond the generalised national approach that is currently being delivered by the CER and must provide a regionally relevant tailored extension and outreach service to be of value to land managers. This could include a support program for new participants to enable them to become informed market participants enabling the producer to make decisions on project opportunities and viability, not just have that decision made by the project developers who may have different risk and financial return thresholds.

Independent support could be assisted by the provision of clear, regionally relevant 'How to' guides that are developed in partnership with Regional NRM bodies, partners and industry. This information will increase the capacity of producers to make informed decisions and encourage participation through de-mystifying the opportunities for greenhouse gas reductions and market participation.

The land sector has a long history of sharing information between producers with formal mechanisms created to achieve this across production systems. Best Practice Groups, Peer to Peer support groups, and Industry excellence awards are commonplace to share information on production techniques, raise awareness of opportunities and innovation and highlight the scope for improvements. Establishment of supported landholder groups and national awards for producers could provide a valuable tool in driving market innovation, participation and recognition at the producer level. All other agricultural commodities benefit from government funded agricultural extension and carbon farming should be no different. The Australian Government through its Regional Land Partnerships program fund a full time Regional Agricultural Landcare Facilitator in each NRM Region as well as other programs targeted at increasing uptake of sustainable practices. Avenues such as these could be better utilised to implement extension programs designed for carbon farming.

Support greater abatement and risk management through regional NRM plans

The provision of updated regional planning that highlights the opportunities through the land sector is essential to drive market development. Australia's regional NRM organisations already provide regional NRM planning that covers the entire country, however since this planning was completed new technology has become available that provides improved data and tools to highlight and prioritise areas for carbon potential while maximising co-benefits. An increased understanding of the methods available and modelling tools that

support them, will provide for modelling the greenhouse gas reduction potential for specific actions and geographic locations at a regional level. This will drive investment in projects where financial returns are most likely.

The recognition of regional NRM plans in the current legislation aims to influence carbon projects to ensure negative outcomes are avoided and co-benefits maximised. It is critical for this role to be enhanced if the full benefit of land sector programs is to be achieved including links to climate resilience and drought preparedness. A broader approach to resolving overlapping impacts, is needed. With the complex and varied nature of NRM practices (with both positive and negative outcomes), a systems approach allows emerging issues to be dealt with as they develop.

Australia should develop regional carbon economy ready plans that target activities to achieve greater uptake and benefit or improve those regional NRM plans that have these in place already as part of the Climate Smart NRM planning investment (2014). They could guide project location and type, identify location for potential suppliers and increase "climate readiness" of the project. Importantly the renewed plans will avoid perverse agricultural and ecosystem outcomes, improve risk management for projects, reduce the negative social and environmental impacts and therefore maintain market access and integrity.

Multiple outcomes and co-benefits - Initial indications from the voluntary market demonstrate that some customers are willing to spend more for projects with demonstrable co-benefits. Further incentives are required that take into account the non-carbon outcomes (beyond personal gain) that projects will deliver; the co-benefits that exist with many land sector projects. While there is significant activity in this area, it is not being effectively driven by market forces alone. Current experience in Qld has shown that intervention and support through Government policy and programs is needed to overcome the difficulty in recognising and valuing co-benefits at a level suitable for market participation. Additionally, in many cases the increased cost in recognising and demonstrating co-benefits is still outweighing the potential increased return. For the recognition of multiple benefits to be successful in driving increased participation and increased abatement while delivering benefits across portfolio areas, the financial return needs to outweigh the costs.

At its simplest, the Australian Government could increase the financial return for the ACCU's it is willing to invest in, to highlight those that deliver across Australian Government policy outcomes. Ideally this would evolve into a scheme that recognises multiple benefit credits for environmental, cultural, and social services. This could be a component contributed by government to account for co-benefits that are not be perceived to be commercial. Recognition of the value of co-benefits generated by some projects will strengthen the economic case for undertaking emission reduction activities. This is where alignment with the Australian government's biodiversity certification scheme could enable this to occur.

A wide range of programs supported by regional NRM organisations have positive carbon outcomes, however these benefits are rarely recognised through monitoring or reporting. It is recommended that regions are supported to enable measuring and reporting of emissions reduction benefits associated with NRM activities.

The 54 NRM regions across Australia have developed climate change and carbon economy ready strategic NRM plans. Many have been involved in regional or jurisdiction wide adaptation planning activities. Updating regional plans to identify co benefit hotspots will provide guidance for landholders, project developers and demand side partners, enabling prioritisation and strategic targeting of specific opportunities for co-benefits.

Innovation, tools and systems to measure abatement - The current cost of monitoring and reporting on abatement achieved under the land sector methods is prohibitive and a clear restriction on increasing emission reductions. Greater recognition of remote sampling methods and calculated abatement will decrease the costs and complexity of participation. These opportunities will be very method specific however the development of a competitive innovation fund will incentivise the development of improved techniques across a much broader spectrum than those currently involved in the carbon market.

Additionally, there is the opportunity for innovation in the policy framework for monitoring and assurance. The implementation of a risk-based approach to monitoring and audit, including application of a threshold of the number ACCU's will reduce costs of participation.

Demonstrating technical and commercial viability - The need to manage risk and commercial return has meant that commercial project developers are not able or willing to work with landholders with smaller project activities. Consequently, there is a role for a carbon aggregator to bundle small parcels of carbon credits to marketable size or for a regional approach to support landholders to work together to develop projects of sufficient size. Aggregation provides risk management for suppliers and increases financial viability. We could consider sponsoring regional or multi-regional cooperatives where the business model provides benefits back into the region and to members and builds capacity and jobs in these areas.

Developing standard agreements, protocols and guidance material for aggregated projects will assist to remove the increased administrative cost and risk with this approach. This can be supported and delivered through regional NRM organisations and could include de-risking the aggregation model for commercial project developers, by providing the initial facilitation service that establishes like-minded groups of landholders that wish to participate under an aggregation model. This will provide a relationship broker role between land managers in preparation for them seeking a project developer or implementing a combined project. This approach can be extended to include smaller land holdings that would otherwise not be viable for an individual project sense.

Due to the immature nature of the carbon market in Australia there are very few business models that are currently applied. Commonly in the land sector, a project developer approaches the land holder after completing a remote assessment of emissions abatement potential. A direct contract is the most common form of agreement enabling participation, with the project developer realising approximately 1/3rd of the return from the project and various levels of joint sharing of costs and risks. The investigation and demonstrating of alternative business models will increase financial returns for producers and increase participation. There are a number of cooperative approaches applied across the agricultural sector and there is a strong opportunity to investigate different roles for facilitating aggregations and testing the business model for landholders to self-aggregate.

Demonstrating paths to market and financial viability is currently difficult due to the lack of transparency in the market and the confidential nature of agreements between project developers and land managers (currently the overwhelmingly most common market model). The provision of transparent market information (including auction prices and trading values and volumes), increased transparency in project registration, credit supply and demand will increase market understanding and increase informed and active participation. This will not only increase participation but will maintain the integrity and supply through current projects. This highlights the need to also include and inform the rural finance and insurance sector.

The production of agricultural system and carbon project specific case studies will assist in informing prospective participants of the opportunities for participation. This can be supported by the production of calculators / predictive tools that will enable landholders to proactively consider the potential production rates and therefore increase informed participation in the market. These tools will provide a greater level of detail so that land managers can consider the range of activities that may be available to them for the production of ACCU's. These tools and case studies must be produced at a level geographic scale that is relevant for land managers and be developed with a specific understanding of the opportunities and risks for specific agricultural production systems.

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Attachment A: Proposals for improving outcomes through regional NRM organisations

Strategic abatement planning - Use regional NRM plans to maximise abatement, multiple benefit opportunities and minimise negative outcomes and risk

There is an opportunity to build upon the existing platform of regional NRM plans/strategies in place across the country, as acknowledged in the Carbon Farming legislation. It leverages the existing capacity within regions to undertake planning-through updating regional plans/strategies to identify abatement opportunities, highlight opportunities for co-benefits and minimise perverse outcomes. Improved plans would enable prioritising and targeting of activities to achieve increased uptake and benefit while maintaining emissions reductions and market integrity

This capacity and information would help enable step-change in carbon abatement, providing information and guidance for demand-side partners to use, informing potential suppliers and enabling government to leverage its investment.

Investment in plans would enable Regional NRM organisations to add a strategic abatement assessment (SAA) layer to regional NRM plans to identify:

- Abatement hotspots
- Co-benefit opportunities
- Risks of perverse or negative outcomes

Some regions have a level of capacity to do this already as a result of the Climate Smart investment in 2014 however the data, modelling and detail now needs updating.

This assessment and layer could:

- Identify locations for potential suppliers
- Guide project location and type.
- Identify and prioritise areas for production of credits with specific co-benefits
- Improve risk management for projects
- Increase “climate readiness” of projects given potential risks to projects as climate changes
- Help ensure market access with more stringent future access requirements
- Provide capacity to be pre-emptive and respond to potential methods
- Provide efficiencies rather than undertaking assessments project by project
- Reduce the potential for negative social and environmental impacts.

A process could pull together a small team with expertise in carbon abatement, ERF, co-benefits and spatial planning expertise to support the regions in this work. Regional NRM clusters (previously established) and collaborative mechanisms will provide increased abatement planning capacity informed by the latest data, information and modelling. This could build upon the foundation of previous work to make NRM plans ‘climate ready’ and incorporate new data and tools, technology and modelling, and relationships with partners with this capacity such as Geoscience Australia and CSIRO.

The could prioritise regional roll-out according to clusters with greatest need due to current and predicted future potential for increased abatement. This element will leverage existing activities being undertaken as part of the Australian Government's Regional Land Partnership program.

Establishing this capacity will contribute to making a step change in capacity to supply carbon abatement. This is a gap not provided by the market. This investment will provide an ongoing legacy and benefit through the NRM plans and contribute to broader government objectives.

From ERF awareness to ERF participation – through information and capacity

There is still a gap in the provision of **independent** information, advice and support for potential land managers/suppliers, other than project developers or those with vested interests. Additionally, there is a gap in information and support **tailored** to diverse locations and land management systems around Australia, and tailored to the stage a land manager/supplier may be at in the adoption **pathway** from awareness to participation.

There are approximately three stages in a land-manager/supplier becoming engaged in the ERF– and each requires differently tailored information and levels of capacity.

A. Creating awareness and preparedness
B. Testing participation
C. Engaging in the ERF or abatement

As a land-manager/supplier progresses through these stages – choosing to continue or not at each – they require more detailed, personal and tailored information and support. This information and support could be different according to the physical location, and the agricultural industry or land management system they are in. In the current framework this is missing, and the current market mechanisms do not provide it. We suggest a program that addresses this gap.

<u>A. Creating awareness and preparedness</u>

- Develop and provide appropriate information for general distribution tailored according to clusters of regions.
- Run processes with networks and partners, using existing channels, to distribute this and build awareness of the ERF and abatement – and what it might mean to them. This also includes basic training of people engaged with the land use sector such as extension and other service providers.

<u>B. Testing participation</u>

- Provide extension and capacity building to land-managers interested in engaging including appropriate practices and tools (such as CSIRO's Digiscape carbon tools)
- Provide peer-to-peer learning processes and examples (sites where appropriate and accessible). These would be evaluated and improved continuously in response to land managers feedback.
- Develop case-studies and examples that are tailored, and relevant regionally and by land-use to apply in the above – once again by clusters of regions with similar characteristics. These would be tested with land managers.

C. Engaging in the ERF

At this point a land manager/supplier may need personalised advice as they make a decision as to how to participate, choose a project developer and enter into legal arrangements.

- Develop standard agreements, protocols and guidance material to remove the increased administrative cost and risk.
- Provide personalised advice and support on project development.

The steps above would require a network of trained staff across Australia based in selected NRM regions to service a geographically appropriate cluster. They would need to have expertise rather than just a generic understanding. This team would be supported to run a Community of Practice to share expertise, knowledge and tools and improve their impact across the life of project. This activity does not replace the role of project developers and commercial players, rather it enables land managers to proactively engage with commercial service providers. As the framework matures and capacity builds there will be a diminishing need for this program.

Inform project design to maximise co-benefits and minimise negative outcomes

There is currently a gap in capacity and incentive to influence project design in order to maximise co-benefits. It is core business for regional NRM organisations to design and implement projects that deliver multiple outcomes. Using the network above, this capacity could be extended to provide advice on carbon project design and to leverage existing investments and activities.

- Provide advice to land managers/suppliers and project developers to shape design in order to integrate and maximise multiple benefits from abatement projects.
- Pre-empt negative outcomes through advice on project design
- Pre-empt broader negative outcomes (that may threaten integrity and supply) by evaluating the broader impact of projects across regions. A feedback loop will enable response and change if such things are occurring, such as land being inadequately managed and impacting upon neighbours, or loss of land to conventional agricultural production.

This element provides a clear pathway for delivery of the existing references to Regional NRM plans in the legislation. This will emphasise benefits that are critical to regional communities and address additional government priorities such as building drought resilience.

Ideally we would establish a Carbon Knowledge Network - 'ERF knowledge brokers' located in regional locations across the country servicing clusters. The network will have access to a pool of funds for undertaking group events and learning processes with land managers.

Develop and implement a mechanism to measure and report abatement benefits associated with NRM activities

There is a large range of natural resource management activities (such as improving soil health, grazing management, improved fire management and increasing or protecting riparian revegetation) that have abatement benefits that are not currently identified. These activities may fit within an existing method but

are not financially viable as an ACCU generating project or there may be no recognised method currently available. We consider the inability to recognise these abatement activities as a lost opportunity for the Australian Government and land managers. The capacity to measure and report on these project activities would help create recognition and opportunities to incentivise and increase abatement outcomes in NRM activities. NRM regions have existing networks with researchers from a regional to a national level to support this work.

- Work in partnership with R&D providers to determine or refine mechanisms for measuring abatement benefits.
- Work with partners, community organisations and land managers to undertake and embed measurement processes, and
- Report on NRM abatement benefits

In addition, this work could link to agricultural industry Best Management Practice programs and sustainability frameworks where appropriate, and work to link to potential accounting and verification processes if possible.

This could be implemented through establishing a core team to develop or refine measures through co-design with land managers, NRM regional organisations, and scientists.

NRM regions would establish and institute a reporting process aligned with existing systems.