c/o Committee Secretary
Senate Environment and Communications Legislation Committee
Parliament House
Canberra ACT 2600
Via email: ec.sen@aph.gov.au

9 October 2026

Dear Committee

RE: Submission to the Inquiry into the *Carbon Credits and Other Legislation Amendment (Integrity and Transparency) Bill 2026*

NRM Regions Australia welcomes the opportunity to make a submission to the Senate Inquiry into the C*arbon Credits and Other Legislation Amendment (Integrity and Transparency) Bill 2026*.

NRM Regions Australia is the national peak body of Australia's 54 regional NRM (natural resource management) organisations which cover the whole of Australia. Our members work with land managers, Indigenous organisations, communities, governments, researchers and industries across the country to manage our land, water, coast, plants and animals for the benefit of people, environment and industries. The regional NRM model ensures there are skilled, independent professionals in place across the country working with local stakeholders to develop strategic NRM plans that reflect the local environment, and social, cultural and economic contexts. These plans are used by the organisations to direct investment to ensure the right projects are delivered in the right places to maximise landscape restoration and resilience outcomes.

Following our earlier submission to DCCEEW[1] we would like to reiterate our support for the change to Australian Government ACCU procurement to secure ACCUs that provide value for money by contributing to a range of social, cultural and environmental benefits, and build

[1] NRM Regions Australia (2026). NRM Regions Australia submission on the Carbon Credits and other Legislative Amendments Integrity and Transparency Exposure Draft Bill. Available at: https://nrmregionsaustralia.com.au/wp-content/uploads/2026/07/NRM-Regions-Australia-submission-on-the-Carbon-Credits-and-other-Legislative-Amendments-Integrity-and-Transparency-Exposure-Draft-Bill-2026.pdf

resilience to climate change. Such a change would also be aligned with the third object of this Act which is to increase carbon abatement in a manner that:

> (a) is consistent with the protection of Australia's natural environment; and
>
> (b) improves resilience to the effects of climate change.

To enact this, we suggest updating the existing proposed amendment s20G(3)(a) to:

> s20G(3)(a) ~~facilitate~~ **ensure** the Commonwealth ~~receiving~~ **receives** value for money for its purchase of carbon abatement; and
>
> **s20G(3)(ab) facilitate net social, cultural or environmental benefits and build resilience to climate change impacts;**

Australian Government purchase of ACCUs from carbon farming projects that are aligned with the objectives of regional natural resource management (NRM) plans (described above) will help to deliver community-supported social, cultural, economic and environmental outcomes.

The ACCU scheme already provides for the use of regional NRM plans. The Carbon Credits (Carbon Farming Initiative) Act 2011, Division 2, 23(1)(ga)(ii) requires that if:

> 'the project area, or any of the project areas, for the project is covered by a regional natural resource management plan; it be accompanied by a statement about whether the project is consistent with the plan;'

This clause was intended to ensure carbon farming projects avoid unintended adverse outcomes and instead create opportunities for additional benefits to nature and communities. Given the whole of Australia is covered by one of the 54 regional NRM plans, all area-based projects are required to confirm consistency with the relevant plan.

The requirement to state whether or not a carbon farming project is consistent with the relevant regional NRM plan is currently administered through a tick box as part of the application process to register a project, with no oversight of how consistency with the relevant plan might be determined or confirmed. Thus it is difficult to determine if the intent of the clause is being delivered.

A first step in ensuring more carbon farming projects are consistent with regional NRM plans could be achieved through requiring carbon farming project proponents to provide a statement demonstrating how, rather than if, their project is consistent with the relevant regional NRM plan. This could be achieved through amending the current provision as follows:

> ‘If the project area, or any of the project areas, for the project is covered by a regional natural resource management plan; it be accompanied by a statement ~~about whether~~ **demonstrating how** the project is consistent with the plan; ‘

All regional NRM plans are based on the same principles of community-informed planning for prioritising regional natural resource management objectives and investments. However, the level of detail provided specifically on carbon farming within plans differs: some regions’ plans include detailed information on how carbon farming projects can achieve consistency with regional NRM plans, some include guiding principles, while others do not explicitly mention carbon farming, and consistency with such plans would be achieved by using information in the plans to ensure projects are developed to ensure the new land use is aligned with the objectives of the plan and that the project is designed and delivered to achieve multiple benefits for the region wherever possible.

General principles for confirming consistency with regional NRM plans have been drafted, and could be provided on the NRM Regions Australia and Clean Energy Regulator websites, and included within regional NRM plans as they are renewed (every five years). However, with additional resources all regional NRM organisations could be supported to incorporate additional carbon farming specific content within regional NRM plans to streamline best-practice, place-based carbon farming project delivery. With appropriate resourcing, regional NRM organisations may also be able to discuss the consistency of projects with proponents during the planning stage, helping to address potential unintended consequences whilst maximising regional benefit.

Thank you for the opportunity to provide this submission. We would be happy to appear before the Inquiry to discuss these issues in more detail. Please direct enquiries to NRM Regions Australia CEO Marnie Lassen at marnie@nrmregionsaustralia.com.au.

About regional natural resource management in Australia

Regional NRM organisations have been leading and delivering projects that enhance and restore nature for over 20 years. They work from the paddock to the regional scale to address issues that require a landscape perspective. This includes through informing and supporting on-ground conservation and environmental restoration programs, delivery of programs to build community capacity in NRM, and engagement with governments and other stakeholders on issues requiring a broader perspective, such as management of biosecurity risks. All regional NRM organisations have a regional NRM plan that describes the NRM priorities for that region. Regional NRM organisations plan, partner, and deliver practical, integrated, on-ground environmental and land management projects to restore nature, promote sustainable agricultural industries, and support economies and communities to thrive.