Australian Government

SUBMISSION TEMPLATE

EMISSIONS REDUCTION FUND

Submission responses

[ISSUE]

The ANPC is concerned that the Carbon Farming Initiative, and the Reforestation and Afforestation methodology in particular, may result in negative impacts on biodiversity by encouraging the planting of long-lived, introduced tree species in locations where locally indigenous plantings or managed regeneration could be used instead.

This is due to the fact that the Reforestation and Afforestation methodology (which doesn't require natives to be used) is much cheaper to implement than the methodologies that do require the use of locally native species, and it seems the methodology doesn't need to be consistent with regional plans.

Therefore, the Carbon Farming Initiative could miss many vital opportunities to make positive contributions to the conservation and ecological restoration of native plants and vegetation communities, and in particular, threatened plant species and Endangered Ecological Communities. It could also harm biodiversity by encouraging the planting of non-declared environment weed species.

This likely low outcome for biodiversity appears to run counter to the third objective of the Carbon Credits (Carbon Farming Initiative) Act 2011 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'.

There have also been a number of studies both here and overseas that suggest that diverse native plantings can have comparable if not higher carbon storage potential than widely spaced monocultures.

Consequently, to maximise the positive outcomes of the Carbon Farming Initiative, the ANPC strongly recommends that:

1/ biodiversity conservation goals be promoted in tandem with carbon storage goals;

2/ the Terms of Reference for the Emission Reduction Fund ensure that the Carbon Farming Initiative promotes and encourages the principle of 'biodiversity co-benefits' and includes measures to ensure that the higher cost of biodiversity co-benefits are covered through grant schemes (such as the Caring for our Country program) and that those projects with biodiversity co-benefits can be purchased at a higher price;

3/ protection of native forests score the highest for biodiversity co-benefits, followed by managed regrowth, and then revegetation using appropriate locally indigenous plant species;

4/ CFI abatement projects be approved by regional bodies and be consistent with regional biodiversity plans;

5/ a biodiversity accounting index is developed and specified in the regulations, to reflect degree of biodiversity benefit and so allow proponents to obtain a market premium based on their input; and

6/ projects which include native species suited to the site conditions be encouraged not only for biodiversity co-benefits, but also to ensure higher success rates for carbon storage due to local native species being more resilient to fire, drought and climate change compared to wet sclerophyll native or exotic species which are often planted in monocultures.