



National
Native Title
Council

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Submissions
Climate Change Authority
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Via Email: submissions@climatechangeauthority.gov.au

Dear Sir / Madam

Thank you for the opportunity to provide comment on the Carbon Farming Initiative (CFI) Review Issues Paper.

The National Native Title Council (NNTC) is an alliance of Native Title Representative Bodies and Native Title Service Providers (NTRBs/NTSPs) from around Australia being formally incorporated in November 2006. The objects of the NNTC are, amongst other things, to provide a national voice for NTRBs/NTSPs on matters of national significance affecting the native title rights of Aboriginal and Torres Strait Islander people.

The NNTC has provided previous submissions to many aspects of the Carbon Farming Initiative, including:

- design of the Carbon Farming Initiative;
- Senate Standing Committees on Environment and Communication Inquiry into the Carbon Credits (Carbon Farming Initiative) Bill 2011 (Cth);
- House of Representatives Standing Committee on Climate Change, Environment and the Arts Inquiry into the Carbon Credits (Carbon Farming Initiative) Bill 2011 (Cth);
- enabling Indigenous participation: native title and land rights land issues;
- Indigenous Co-Benefit Principles; and
- Positive and Negative Lists for the Carbon Farming Initiative.

In all previous submissions, the NNTC has broadly supported and welcomed the introduction of the CFI, particularly as it provides significant opportunities for Indigenous people to engage in economic development that will not only improve livelihoods but also allow people to maintain and strengthen cultural connection to country.

In addition to carbon abatement, projects on Indigenous land can deliver environmental benefits such as biodiversity conservation, feral animal control and natural resource management. Projects also have the potential to deliver significant social benefits such as the protection and maintenance of cultural sites, and providing training and employment opportunities.

As a result, the NNTC not only supports the need to assess the amount of emissions reductions in order to determine the environmental effectiveness of projects, but strongly advocates that any assessment measures also take into account the delivery of social and economic benefits for Indigenous communities across the country.

Support for Indigenous Carbon Projects

The NNTC believes that Indigenous peoples can only fully realise the social and economic opportunities through carbon projects where there is a policy and legislative environment that facilitates full and proper participation of Aboriginal and Torres Strait Islander peoples. It is equally important that Indigenous carbon projects receive sufficient government support to ensure their ongoing viability. Indigenous carbon projects have been able to achieve some success due to the support and investment from sources such as the Biodiversity Fund and the sale of carbon credits.

The NNTC would argue that the voluntary price of carbon credits under the Emissions Reduction Fund (ERF) would not fully support the cost of Indigenous carbon projects, particularly in regional and remote areas. Nor would revenue from an ERF contract under a least-cost purchasing model likely be sufficient to support an Indigenous land based carbon project, running the risk of forcing projects to operate with reduced capacity thereby undermining any opportunity to deliver other important benefits such as the provision of economic development or employment opportunities.

Indigenous carbon projects also face unique challenges in meeting the requirements of the ERF. Whereas one-off technology upgrades may deliver for industrial type carbon abatement projects, Indigenous land based projects such as annual savannah burning or tree planting require continuous monitoring and management. In addition, the environmental effectiveness of such land based carbon projects will only be measurable over a significant period of time.


In addition to the support provided under the ERF and enabling access to private-sector funding through the voluntary market, complementary Government programs would be required to not only support but also provide incentives for Indigenous participation in the carbon market. Without access to Government funding or other investment opportunities the ongoing viability of Indigenous carbon projects could become questionable.

The NNTC therefore submits that the participation of Indigenous peoples within the scheme should be supported by the establishment of a discrete funding arrangement for Indigenous carbon projects. Such a fund could also provide additional support for Indigenous projects if it were divided into broad ecological categories in order to maximise the diversity of projects able to be undertaken across the country.

Finally, whilst the NNTC does appreciate the additional few days in which to provide comment we would be concerned if the two week time frame in which to comment on further reviews of the CFI becomes commonplace. The NNTC and member NTRBs/NTSPs remain committed to assisting in further developments and refinements of the CFI and seek assurances that adequate time will be provided in future.

I trust these comments are useful for your purposes, however if you have any queries or require any further information please do not hesitate to contact me at your convenience.

Yours sincerely


Brian Wyatt
Chief Executive Officer