

c/o ACT Natural Resource Management Council  
GPO Box 158  
Canberra ACT 2601

Committee Secretary  
Senate Standing Committee on Environment and Communications  
PO Box 6100  
Parliament House  
Canberra, ACT 2600

27 April 2011

Dear Secretary

**Inquiry into the Carbon Credits (Carbon Farming Initiative) Bill 2011 – Addendum to the 18 April 2011 submission of the National NRM Region's Working Group**

On the 18 April 2011 I provided a late submission to the Senate Inquiry on behalf of the National NRM Region's Working Group. Since that submission was made the Working Group has met and discussed the submission. We believe that the following additional comments about the role of regional Natural Resource Management (NRM) plans may assist the Inquiry.

The third object of the Bill 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.* As recognized by the Bill, regional natural resource management plans are a critical instrument for helping ensure that projects contribute to this third object. Regional natural resource management (NRM) plans provide the appropriate framework for evaluating projects so as to identify and minimise perverse outcomes and maximise co-benefits. However, to ensure they play an effective role in giving adequate effect to this objective, the references to regional plans in the Bill should be clarified and strengthened.

1. We recommend that regional NRM plans be defined in the Bill in terms of the key characteristics needed to ensure they will be fit for purpose, including that:
  - a. A plan identifies the (i) values, (ii) assets, (iii) risks, (iv) opportunities and (v) resilience status of a defined region;
  - b. A plan is developed (i) using a participatory and inclusive process, (ii) making the best possible use of available evidence, and (iii) with a spatial basis; and
  - c. A plan reflects the region's circumstances and local context and goals set at a State and National level.
2. It follows that resources need to be provided to regional bodies to ensure that all regional NRM plans meet these characteristics and are upgraded as necessary and as soon as possible. These resources may include assistance at a national scale through the

provision of systems that support and strengthen evidence-based decision-making and access to the best possible evidence.

3. It may be necessary to have a “go” and “no-go” list to identify co-benefits and perverse outcomes as an interim measure until regional NRM plans are made fit for purpose.
4. Standards defining that a regional NRM plan is fit for purpose will need to be developed.

I look forward to hearing from you,

Yours sincerely

Dr Sarah Ryan  
Chair, National NRM Regions' Working Group  
& Chair, ACT NRM Council