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14th June 2019

Secretary Social Policy Scrutiny Committee, NT Parliament House

RE: Environmental Protection Bill

Dear Committee Members,

ALFA (NT) Limited welcomes reforms to the Environment Protection Bill to update the NT environmental approvals process for major projects and land uses such as fracking, mining, major constructions or waste management. However, ALFA notes and writes to voice concern that a requirement to reduce and/or offset greenhouse gas emissions has not been included in the current drafting of this legislation.

ALFA (NT) Limited is an Aboriginal-owned carbon business working in partnership with Traditional Landowners and Aboriginal ranger groups over more than 80,000 km² of Aboriginal freehold land (under the *Aboriginal Land Rights Act (NT) 1976*) in Arnhem Land in the Northern Territory of Australia. ALFA is the registered project proponent for five projects which generate Australian Carbon Credit Units (ACCUs) through the savanna burning methodology and is currently the largest producer of savanna burning ACCUs. ALFA is a not for profit Company that derives its income from the sale of ACCUs. The proceeds from the sale of carbon credits are reinvested to fund the on-ground land management activities of the Aboriginal ranger programs within the fire project areas in Arnhem Land. The engagement in savanna fire management through the CFI/ERF provides a critically important source of income and employment and is integral to the environmental, social and cultural fabric of Arnhem Land in which ALFA operates.

The omission of a framework within the revised Environmental Protection Bill to reduce and regulate greenhouse gas emissions is seemingly at odds with previous positive initiatives by the Northern Territory Government (NTG) which have enabled innovation and opportunity within the carbon industry. For example, the NTG played a vital role in brokering non-commercial aspects related to the development of the Darwin LNG plant with ConocoPhillips. Prior to the introduction of Federal carbon legislation, the NTG used existing regulatory frameworks to place environmental conditions on the DLNG operating licence and broker a funded environmental offsets project. The resultant project, WALFA – West Arnhem Land Fire Abatement, was incredibly successful and became the landscape scale model on which the Savanna Burning methodology under the *Carbon Credits (Carbon Farming Initiative) Act* was based. This has subsequently enabled registered fire projects across northern Australia to earn Australian Carbon Credit Units through the management of fire. Today there are over 70 registered savanna burning projects and they have abated over 6 million tonnes of greenhouse gas.

The implications of the omission of a greenhouse gas emissions framework within the Environment Protection Bill is multifaceted as it:

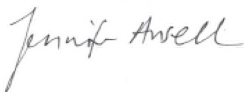
- fails to address the Northern Territory's environmental responsibility to reduce its greenhouse gas emissions
- misses an opportunity to create synergies between the Environmental Protection Bill and the NTG's developing climate change and offsets policy
- misses an opportunity to assess the environmental merits of future developments on the basis of their greenhouse gas emissions and;
- fails to recognise the opportunity that is currently provided, and could be expanded, through the local production of greenhouse gas offsets

ALFA reiterates the sentiments of the Indigenous Carbon Industry Network in calling on the Social Policy Scrutiny Committee, to amend the Environmental Protection Bill to:

1. Ensure that reducing the Territory's greenhouse gas emissions, and increasing action to draw down atmospheric greenhouse gases, is an Object of the Bill, and a mandatory consideration for every decision-maker and authority throughout the Bill, including s73.
2. Define a carbon offset as being separate to other types of environmental offsets (under s125 and s126) since unlike other environmental offsets, a carbon offset is clearly measured and regulated by the Clean Energy Regulator through the sale of Australian Carbon Credit Units (ACCUs) under the Carbon Credits (Carbon Farming Initiative) Act 2011.

Please do not hesitate to contact me at any time if you would like further information.

Yours sincerely



Jennifer Ansell
CEO
ALFA (NT) Limited