



Friday, November 29, 2019

**Department of Water and Environmental Regulation  
Western Australian Government**

**RE: ICIN Submission to the Western Australian Climate Change Issues Paper.**

To the Department of Water and Environmental Regulation,

Thank you for the opportunity to respond to the Western Australian Climate Change Issues Paper.

ICIN congratulates the Government on its decision to adopt a zero carbon emissions target by 2050 and to develop a climate change policy. Leadership on climate change policy is vital to growing the future of the Indigenous Carbon Industry, contributing to improved market certainty, jobs growth and enabling businesses to plan forward.

ICIN encourages the Government to make this aspiration a reality through legislated emissions reduction targets and by embedding this commitment in all relevant legislation and policies.

Our members, all Indigenous organisations supporting carbon businesses across the north, seek the support of the Western Australian government to realise opportunity created through the Indigenous carbon market. Our WA members include:

- Kimberley Land Council
- Wunambal Gaambera AC
- Dambimangari AC
- Wilinggin AC
- Balangarra AC

ICIN strongly endorses the submission by the Kimberley Land Council which details how the Western Australian Government can support and engage in the carbon market for the benefit of Indigenous communities and Traditional Owners across WA, but particularly in the Kimberley region. This includes:

- A. WA climate change policy supporting a robust carbon offset market, integrated with Australian Government carbon offset frameworks;
- B. Clarity on requirements for WA Carbon offset projects;
- C. Protection of native title rights and interests;
- D. Improved engagement with the Aboriginal carbon sector; and
- E. Targeted support for the Aboriginal carbon industry.

ICIN would like to see the Western Australian Government make firmer commitments to the delivery of the objectives of this Issues Paper.

We note, in the Issues Paper,

*Already one of the most fire-prone regions in the world, Western Australia's fire risk has increased over the past four decades, and fire seasons have lengthened due to warming, drying conditions.*



Just over 1.2 million tons of greenhouse gas emissions were abated through fire management by Indigenous carbon industries in the 17/18 year alone, equivalent to around 10% of Australia's total annual production of carbon credits. It would be helpful to show how carbon industries are creating greenhouse gas emissions savings for Western Australia in the Issues Paper.

There is also an interaction between both the abatement of greenhouse gas emissions and the adaptation to climate change impacts through investing in supporting Indigenous fire management. As our recent experience of terrible hot fires this year has shown, investing in Indigenous fire management programs and supporting Indigenous fire management carbon projects should be a vital part of any government's climate change policy.

**ICIN calls for the Government to identify a clear pathway for communications with ICIN as soon as possible so that any policy-making includes proper consultation with our members.**

It is not clear how a climate change policy will be implemented without clear government support across agencies and across governments.

We note, in the Issues Paper: *The Government of Western Australia has committed to working with all sectors of the economy to achieve net zero emissions by 2050.*

Despite our best efforts, we have not been able to establish regular contact with the Western Australian Government to find out how they intend to support the Indigenous carbon industry. In this regard it is falling behind other states and territories, including the Northern Territory, Queensland and Australian governments which have committed resources to support ICIN and together we have established a working group to keep abreast of relevant policy developments.

The apparent exclusion of Indigenous carbon businesses from Western Australian policy-making is to the detriment of Indigenous land managers as well as the Western Australian Government. Since the Government lacks the understanding or capacity to properly support the Indigenous carbon market, it is likely therefore to miss out on the employment, income and other socio-economic benefits which flow from this.

**ICIN calls for the Government to be fully cognizant of the Native Title rights and interests of the Traditional Owners of Western Australia and supports the recommendations by the Kimberley Land Council in this regard.**

ICIN strongly supports the need for Free, Prior and Informed Consent to be obtained before any carbon project is established on Native Title land. To assist, it has developed Best Practice FPIC Guidelines in collaboration with land councils.

ICIN recommends the Western Australian Government reflect in its Climate Change Issues Paper that Indigenous communities are particularly vulnerable to the impacts of climate change due to:

- Their remote location
- High rates of social and economic disadvantage
- Lack of, or aged infrastructure and housing

Conversely, because of their strong connection to country, community and culture and thousands of years of experience in managing their lands and waters, Indigenous communities are also well placed to respond to climate impacts.



**Ongoing funding of Indigenous ranger groups remains critical to supporting WA's response to climate change.**

A recent study by Social Ventures Australia found a 3:1 return was delivered by government investment in Indigenous ranger groups across north Australia<sup>1</sup>

Additional income brought by carbon projects enables Indigenous land managers to undertake effective fire management as part of their land management activities.

Efforts to mitigate greenhouse gas emissions through land management activities are strongly tied to efforts to respond to the impacts of climate change, by maintaining resilient landscapes.

For example, weed management is closely tied to fire management. Stopping the spread of fire weeds such as Gamba grass is critical to managing fire (and therefore increased emissions) in a hotter, less predictable climate, given that its higher fuel load means it has the capacity to burn many times hotter than native grasses and infestations are very difficult to eradicate.<sup>2</sup> Under new emissions avoidance methodology rules, carbon projects containing Gamba grass are forced to remove the area from their project if land managers are unable to eradicate the infestation within 12 months. This means the spread of Gamba grass is a direct threat to the viability of savanna fire projects.

Through their Indigenous ranger programs and carbon businesses, all of our members provide remote job opportunities on country for Indigenous people which support the handing down of traditional language, customs and culture. These businesses also support Traditional Owners to access and manage their country through locally informed land and sea management programs.

Long-term government investment in Indigenous ranger groups and homelands will allow remote communities to better manage some climate impacts.

**ICIN calls for the Government to outline how it intends to resource the implementation of its climate change policy, including any commitment to support emerging carbon industries.**

Given the lack of federal policies on climate change outside of the Carbon Farming Initiative Act and National Greenhouse and Energy Reporting Act, the Indigenous carbon industry is now looking to states and territories to provide policy certainty which incentivizes businesses operating in the Northern Territory to decrease their greenhouse gas footprint.

It is important that the Indigenous carbon industry is supported to be able to increase the supply of carbon credits to the market, by investing in science supporting new carbon abatement and sequestration methodologies, as well as working with the Australian Government to ensure policies enable future development of this critical industry for remote Indigenous communities.

The potential introduction of compliance measures to encourage polluters to reduce their greenhouse gas emissions could further increase demand for ACCUs (carbon credits).

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<sup>1</sup> Healthy Country, Healthy People (2016) Social Ventures Australia, <<https://www.socialventures.com.au/sva-quarterly/healthy-country-healthy-people/>>

<sup>2</sup> Field of Nightmares: Gamba Grass (2013) Petty, A., The Conversation, < <https://theconversation.com/field-of-nightmares-gamba-grass-in-the-top-end-12178>>



Providing funding to assist Indigenous groups with start-up costs as well as setting up their own governance structures to hold carbon projects is another important area where governments can assist. For example, in response to the document 'Delivering Jobs and Growth in Rural, Regional and Remote Queensland through Carbon Economies – Key Policy Principles' (Aboriginal Carbon Fund and The Wilderness Society) the Queensland Government decided to establish the \$500m Land Restoration Fund. A similar policy approach for co-investment could be adopted by the Western Australian Government.

It is vital that government aligns its legislative, policy, economic and investment decision frameworks to cut Western Australia's greenhouse gas emissions and support emerging carbon industries.

**Indigenous land managers deliver environmental and cultural services for the benefit of the entire nation, and the world.**

The wealth of experience by north Australia's Indigenous fire managers is immense, so much so that their experience is now sought after throughout the world. Rangers are sharing their knowledge in direct exchanges with fire managers in Botswana, in California and in Brazil.

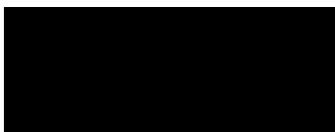
Their fire management work is abating millions on tons of greenhouse gas emissions each year for the benefit of the planet, whilst generating positive biodiversity and cultural outcomes of global significance.

Investing in the science to support the development of future carbon methodologies as well as supporting engagement of Indigenous groups in accessing these opportunities is critical to the future growth of this important industry.

**Support for long-term funding of critical information services**

Finally, the North Australian Fire Information service (or NAFI, available at [www.firenorth.org.au](http://www.firenorth.org.au)) is a critical information service supporting fire management by our members across north Australia. Ensuring this service has long-term funding independent of election cycles is critical to supporting properly informed management and planning by fire managers in remote areas.

Sincerely,



Anna Boustead  
Coordinator  
Indigenous Carbon Industry Network



## Recommendations to the Western Australian Government regarding its Climate Change Issues Paper

1. Clearly articulate what resources will be allocated toward implementing its climate change policy.
2. Clearly articulate which government departments and representatives are responsible for implementing its climate change policy; including Carbon Offset policies. Ensure that these departments are held accountable to the public through regular reports.
3. Engage ICIN and its members fully in the implementation of its climate change policy.
4. Engage Indigenous communities early and empower Indigenous communities to implement the mitigating and adaptive actions of highest priority to them in response to climate change.
5. Strengthen the commitment to a legislated zero carbon target. Outline how existing WA legislation will be amended to implement this Issues Paper, including specific requirements to measure, monitor and where possible, reduce greenhouse gas emissions from all types of development.
6. Develop action plans attached to interim measurable targets to support the implementation of the WA Climate Change Policy.
7. Commit to a climate-based decision-making model to Avoid – then Reduce – then Offset greenhouse gas emissions.
8. Through marketing and compliance mechanisms, encourage the priority purchase of locally produced high quality carbon credits as carbon offsets.
9. Adopt a whole of government policy to reduce and then offset its own greenhouse gas footprint including vehicle use and energy use. (For example, the Queensland Government recently decided to purchase carbon credits generated by Indigenous carbon businesses to offset the emissions from its entire vehicle fleet).

### Land management

1. Empower Indigenous ranger groups and Traditional Owners to identify and respond to climate change impacts happening on their country.
2. Increase long-term funding support to Indigenous ranger programs and homelands.
3. Provide clear and consistent recognition of carbon rights embedded in Native Title rights and interests.
4. Take action to stop the spread of gamba grass into new areas. This includes proper enforcement and compliance of all landholders and support for land managers to control gamba.
5. Support the annual Savanna Fire Forum hosted by ICIN, to facilitate knowledge sharing between fire managers, Indigenous carbon businesses, land managers, scientists, government and other business sectors. See [www.savannafireforum.net](http://www.savannafireforum.net)
6. Support ongoing funding of the vital FireNorth (NAFI) application which provides real-time maps and detailed information about fires, fire scars and vegetation types to assist land managers with fire project planning and reporting.



7. Support Indigenous people to respond to the impacts of climate change by identifying areas at risk and providing funding support to respond, noting their particular vulnerability to these impacts.

### **Business Sector**

8. Support ICIN to engage its members in the WA business sector through alerting ICIN to industry events, policy development and networking opportunities.
9. Support ongoing funding of the Indigenous Carbon Industry Network to support Indigenous carbon businesses to participate in the carbon industry (currently jointly funded by Commonwealth, NT and QLD governments until June 2020).
10. Allocate dedicated funding to support Indigenous communities to access opportunities in the carbon market, through start-up grants and full-value pricing.
11. Support the WA business sector to build emissions assessments into accounting for all business activities using triple-bottom-line assessment methods.
12. Build emissions assessments into all development assessments as part of requiring triple bottom line reporting and the climate-based decision-making model.

### **Science Sector**

13. Support scientific research toward the development of methodologies for assessing the carbon stored by different vegetation types, as well as fire management and management of sea country.
14. Provide funding for the development of new methods to support increased Indigenous participation in carbon markets across Australia, including support for research by Darwin Centre for Bushfire Research, CSIRO, The Nature Conservancy, NAILSMA, Ten Deserts and others toward new savanna carbon sequestration and abatement methodologies.
15. Fully recognise the significant contribution which Traditional Knowledge makes to the WA's Climate Change Issues Paper by investing in and promoting research, programs and events which support knowledge sharing.
16. Undertake detailed mapping and engage with landholders and scientists to identify impacts of climate change upon land management activities and remote communities and support appropriate community-driven responses to those impacts.



## Background

### What is the Indigenous Carbon Industry Network?

The Indigenous Carbon Industry Network (ICIN) has evolved to support a pathway for improved communication between internal and external parties in the Indigenous carbon industry. It was initiated early in 2018 as an outcome of the Savanna Fire Forum held in Darwin. Its primary goal is to support land managers to participate in emerging carbon industries as fully as possible with a good understanding of its associated risks and benefits.

The ICIN includes Indigenous savanna carbon producers, Indigenous project developers and supporting organisations from across northern Australia. It is overseen by a Steering Committee consisting of representatives from Indigenous organisations with significant experience in hosting carbon projects across northern Australia.

### Indigenous Carbon Industry Network Objectives

The Network's core objectives are:

1. Building capacity through knowledge sharing among Indigenous practitioners.
2. Setting best-practice standards and guidelines for Indigenous engagement.
3. Facilitating engagement and collaboration with state, territory and Australian governments in policy development.
4. Increasing access and engagement by Indigenous projects with the corporate sector.
5. Strengthening the role of the network.

The Commonwealth Department of Environment and Energy as well as the Northern Territory Government and Queensland Government have committed funding for a part-time ICIN Coordinator to support the network until June 2020.

Contact details for the ICIN are as follows:

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[REDACTED]



## Growing the Indigenous Carbon Industry

The Indigenous carbon industry is a major emerging industry which has recently rapidly expanded from the successful West Arnhem Land Fire Abatement (WALFA) project launched in 2006 to over 27 Indigenous savanna fire projects across the Top End of the Northern Territory, the Kimberley, Central Australia and Far North Queensland.

**Indigenous carbon projects generate multiple benefits to local communities, the environment and the entire planet.**

The Indigenous carbon industry is an important vehicle for Indigenous people seeking to work on their traditional lands. This provides a pathway to more job opportunities and training whilst maintaining important connections to family, community and country. The industry generates revenue for Indigenous ranger groups and land owners across northern Australia.

Through the savanna fire projects, ranger groups work with Traditional Owners and scientists to meticulously plan, map out and record their work to create detailed fire maps of their country. This process:

- brings Traditional Owners back to their country;
- supports the handing down of traditional knowledge from elders to future generations;
- facilitates other land management activities;
- supports Traditional Owners to fulfil cultural obligations to look after country;
- builds on both traditional and western knowledge of country through opportunities for exchange of cultural and scientific information; and
- provides meaningful employment and training opportunities in very remote areas, where jobs are often scarce.

The flow-on social benefits brought by the projects are still being understood but these include, greater self-determination of remote communities, improved community cohesiveness and independent resourcing of outstations and communities.

There are also significant environmental benefits brought by these savanna fire projects. Through shifting the fire regime from predominantly late dry season fires to predominantly early dry season fires, savanna fire projects increase biodiversity, improve soil health and cause a significant reduction in greenhouse gas emissions from savanna fires.

***“This fire management program has been successful on so many levels: culturally, economically and environmentally. Through reinstating traditional burning practices, new generations of landowners have been trained in traditional and western fire management, hundreds of thousands of tonnes of greenhouse gas have been abated, and the landscape is being managed in the right way.”***

***Dean Yibarbuk, Fire ecologist and Senior Traditional Owner, West Arnhem Land***

### **How does savanna fire management generate carbon credits?**

The Indigenous people of Australia have always used fire in different ways to manage the land, increase food availability, fulfil cultural obligations to care for country, assist with hunting and



increase access to country. Thousands of clan groups across Australia have recorded their knowledge and use of fire over tens of thousands of years in songs and stories. Fire can be small, controlled and cool, bringing new growth to grasslands and woodlands. Fire can also be hot and destructive if not managed properly. This detailed understanding of how to manage fire at the landscape scale eluded early European colonisers, who lacked an appreciation of the role of fire in managing Australian landscapes.

During colonization, many Aboriginal and Torres Strait Islander people were either dispossessed of their lands or had their land management traditions interrupted. In most areas, people were no longer permitted or able to fulfil their cultural obligations to manage country. Fire was excluded from the landscape by new laws making it a crime to light fires. Without the careful management of fire that characterized pre-colonial Australia the landscapes were often left unburnt until the late dry season when lightning or misadventure would ignite fast moving and destructive wildfires that were massive in extent. This new regime is recognized as a key driver of species loss across northern Australia, particularly amongst small mammals and granivorous birds.

Savanna woodlands and grasslands cover about 1.9 million square kilometres, or about 23% of the Australian continent.<sup>3</sup> The contribution of greenhouse gases due to these hotter, more widespread fires in the savanna region of northern Australia is of global significance, representing about 3% of Australia's total greenhouse gas emissions.

**In the Northern Territory alone, savanna fires are attributed to about 35% of its entire greenhouse gas footprint, making savanna fire projects a particularly significant pathway for reducing the Northern Territory's total emissions.<sup>4</sup>**

Since Aboriginal Land Rights were legally recognised in 1976 and Native Title rights were recognised in 1991, Aboriginal people have been slowly acquiring their land back. Over 50% of the NT is now recognised as Aboriginal Land, including over 80% of the coastline.<sup>5</sup> Indigenous ranger groups have established to manage these vast tracts of land. This means that the Territory's Indigenous people are at the forefront of responding to climate change, through land and sea management.<sup>6</sup>

Indigenous ranger groups now combine modern technology such as GPS tracking devices, fire incendiary machines and drip torches, with traditional knowledge to re-establish traditional fire regimes on their country. The Indigenous carbon industry emerged out of scientific research showing that a significant savings could be made in carbon emissions by re-establishing traditional fire regimes in the landscape, which favor predominantly early dry season burning. These savings in emissions, when measured, could create carbon credits to offset generation of greenhouse gas pollution by other industries.

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<sup>3</sup> Carbon Farming (2018) Western Australian Government, < <https://www.agric.wa.gov.au/climate-change/carbon-farming-reducing-emissions-through-savanna-fire-management>>

<sup>4</sup> Carbon in the Northern Territory (2016) Territory NRM, <[https://docs.wixstatic.com/ugd/da28f0\\_5bc40bcd562e4e8f9bd4cc7eb58f9008.pdf](https://docs.wixstatic.com/ugd/da28f0_5bc40bcd562e4e8f9bd4cc7eb58f9008.pdf)>

<sup>5</sup> Native Title Information Handbook (2016) AIATSIS, <[https://aiatsis.gov.au/sites/default/files/products/native\\_title\\_information\\_handbook/native\\_title\\_information\\_handbook\\_2016\\_nt.pdf](https://aiatsis.gov.au/sites/default/files/products/native_title_information_handbook/native_title_information_handbook_2016_nt.pdf)>

<sup>6</sup> Assets and Pressures of the Northern Territory (2016) Territory NRM, <[https://docs.wixstatic.com/ugd/da28f0\\_f71236c1b2ca4d9a91762ae281dd0944.pdf](https://docs.wixstatic.com/ugd/da28f0_f71236c1b2ca4d9a91762ae281dd0944.pdf)>



Through the Australian Government's Emissions Reduction Fund, registered carbon projects can sell Australian carbon credit units (ACCUs) through an auction to the Government. Projects may also sell their ACCUs privately, including to companies seeking to voluntarily offset their carbon emissions.

#### **Current state of the Indigenous Carbon industry<sup>7</sup>**

- **Over 27 Indigenous-owned and operated savanna fire projects supported by around 31 Indigenous carbon businesses.**
- **Enabling improved Indigenous fire management over 17.3 million hectares of north Australian savanna**
- **Abating approximately 1.2 million tonnes of CO<sup>2</sup>e each year**
- **Generating over \$16 million worth of ACCUs in the 2017/18 year**
- **Over 10% of all ACCUs produced (across all methods) are generated by Indigenous carbon businesses through savanna fire projects.**
- **Over 75% of ACCUs produced by the savanna fire emissions avoidance method are generated by Indigenous carbon businesses across north Australia.**
- **About 68% of production occurs in the Northern Territory (828,069 tonnes).**

On the voluntary market ACCUs delivered by Indigenous carbon businesses are already able to attract a premium price substantially higher than the standard ERF price. As recognition of the multiple benefits delivered by Indigenous carbon projects grows, so does the potential for measuring and recording the social, cultural, and ecosystem values which are delivered by the projects. For example, the Aboriginal Carbon Fund have developed a Core Verification Framework for environmental, social and cultural values of carbon farming. And the Darwin Centre for Bushfire Research is working with environmental economists and fire managers to measure the biodiversity and ecosystem service benefits delivered by fire management.

The announcement of a new savanna fire management methodology to allow the generation of ACCUs through good land management promoting sequestration and storage of carbon in northern Australian savannas is an emerging opportunity for Indigenous carbon businesses.

The introduction of stronger incentives and compliance measures to encourage polluters to reduce their greenhouse gas emissions through improved climate change policies by corporates, governments, states and territories as well as local governments could further increase demand for ACCUs.

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<sup>7</sup> Sourced from: Emissions Reduction Fund Project Register (2018) Clean Energy Regulator, <<http://www.cleanenergyregulator.gov.au/ERF/project-and-contracts-registers/project-register>>