

To:

Environment Policy | Office of Climate Change
Department of Environment, Parks and Water Security
Northern Territory Government,
Floor 1, Arnhemica House, 16 Parap Road, Parap
PO Box 3675, Darwin NT 0801

Date: 07 September 2021

From:

Landari Pty Ltd
170 Dangar Street,
Armidale, NSW, 2350

**Re; Greenhouse Gas Emissions Offsets Policy and Technical Guidelines
Northern Territory Offsets Framework**

I write regarding the 'Greenhouse Gas Emissions Offsets Policy and Technical Guidelines Northern Territory Offsets Framework' on behalf of Landari [see www.landari.com]

Landari is a Carbon Offsets and Biodiversity Offsets project developer, concentrating on the use of permanent vegetation to sequester Carbon.

Landari welcome the release of these guidelines; and understands that the policy will form a key component of the [Northern Territory Offsets Framework](#). Development of the policy is also seen as an action under the Territory's climate change action plan, called '[Delivering the Climate Change Response: Towards 2050 A Three Year Action Plan for the Northern Territory Government](#)'. Landari believes that the NT target of being Net Zero by 2050 is a desirable outcome for this policy setting.

With respect to Biodiversity Credits, Landari will interact with the NT Government department DEPWS.

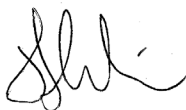
Landari have been active in the CER CFI [Plantation Forestry] and other land sector methods. In this context the following specific recommendations are made.

1. Section 7.1 dealing with the determination of when Offsets are required. Landari believes the Clean Energy Regulator has addressed this hierarchy and the NT framework could consider this approach
2. Section 8.1.1 dealing with ACCU as the preferred unit. As the Clean Energy Regulator represents the Federal approach and leadership to Australian carbon units, the use of ACCU's is highly recommended as outlined in this section
3. Section 8.1.2 dealing with Alternative emission offsets units. Landari believes such alternative offset unit can be confusing for project developers and even when conforming to the federal approach for carbon units generally should not be widely endorsed.

I hope these comments are helpful.

We look forward to the GHG framework and the NT biodiversity framework both being legislated soon.

Sincerely



Arjan Wilkie

Managing Director

Landari Pty Ltd