

13 December 2024

Strategy & Coordination Branch  
Clean Energy Regulator

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Our Ref: PFT24/706  
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## Proposed new Audit Thresholds Instrument

Thank you for your email of 15 November 2024 and the opportunity to provide feedback on the proposed new Audit Thresholds Instrument under the Australian Carbon Credit Unit Scheme.

Private Forests Tasmania (PFT) is an independent statutory authority established under the Tasmanian *Private Forests Act 1994*. We work to facilitate and expand the sustainable growth and development of the private forest resource in Tasmania. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2024-27](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

PFT has reviewed the consultation paper and provides the following response to consultation question 3:

*Question 3. Should alternative assurance arrangements be extended to the new reforestation by environmental or mallee plantings method and, if so, are any changes required?*

PFT strongly supports alternative assurance arrangements being extended to REMP 2024. Small-scale reforestation projects are particularly sensitive to audit costs which can be in the tens of thousands of dollars for an initial and then subsequent audit. The use by the CER of geospatial tools and other measures as 'alternative assurance' is now proven to be effective for low-risk projects. Reducing the number of physical audits will significantly reduce overall audit costs and therefore increase the viability of small-scale projects leading to a likely increase in plantings and participation in the ACCU Scheme.

PFT believed these arrangements had already been carried forward from the old REMP 2014 into the new method. However, if that is not the case they should be included at the first opportunity.

We look forward to further engagement with the CER to assist in streamlining ACCU Scheme processes, increase participation and reduce carbon emissions. If you have any queries on the points we have raised, please contact me on 0409 843 928 or our Policy & Data Officer Murray Root on 0424 601 819.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Elizabeth Pietrzykowski', with a stylized flourish at the end.

**Dr Elizabeth Pietrzykowski**  
CEO Private Forests Tasmania