

26 September 2022

ACCU Review Secretariat
Department of Climate Change, Energy, Environment and Water
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Our Ref: D22-470939
Your Ref: [\[Click to enter text\]](#)

Dear Review Secretariat,

Thank you for the opportunity to provide input into the Independent Review of Australian Carbon Credit Units. Private Forests Tasmania (PFT) have reviewed the various consultation documents including the Terms of Reference and the consultation paper.

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 2022-25](#) one of our four goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

There is some alignment between PFT's objectives and those of the ERF – using trees to sequester and store more carbon in forests and forest products. To this end our interest and participation in the ERF has been primarily on the development of vegetation methods, in particular the co-design process for the review of the Plantation Forestry Method and the current development of the Integrated Farming Method. These methods, and the Farm Forestry Method, are particularly important to many of our private forest grower stakeholders.

Rigour and integrity of ERF methods and projects (relevant to ToR 1)

It is paramount the integrity of the ERF and the associated ACCU's is maintained. In that regard our experience with the Clean Energy Regulator through the above mentioned co-design processes has been very positive. Considerable effort is expended by the Regulator on ensuring the integrity measures built into the methods are robust, however this can sometimes lead to excessive transaction costs particularly for small projects. There is always room for improvement in regulatory efficiency and consideration should be given to ensuring the project approval pathways and audit requirements for small project participants are risk based.

The Emissions Reduction Assurance Committee (ERAC) process, when assessing methods against the Offsets Integrity Standards, is intended to be a public process, however their processes and their final advice to the Minister is often difficult to find or locate on the CER's website. Staff from our organisation subscribe to the various consultation hubs on the CER and DCCEEW websites but are rarely advised or invited to participate in relevant ERAC processes. To improve transparency and accountability, and therefore public confidence in the integrity of the methods, the ERAC processes could be made more easily accessible to interested parties.

Currently the ERF Project Register provides basic project details which are downloadable in an excel spreadsheet format. To improve transparency and accountability, the ERF Project Register could

provide additional public information specifically on the integrity measures that have been met by each project. For each method this would involve different types of information but it would provide more transparency and should help build public confidence in the methods and the projects registered under them.

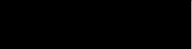
Relationship to voluntary Climate Active certification (relevant to ToR 2)

Currently under the Climate Active program, a carbon account that is calculated for an entity or product measures sources of annual greenhouse gas emissions (CO₂e) and the acquisition and surrendering of carbon credits to offset these emissions. However it does not allow for the calculation and offsetting of CO₂e emissions that an entity may sequester annually through trees being grown by them. For example, a farming enterprise or a plantation management company that has devoted some or most of their land to growing trees, the CO₂e that is being sequestered by these trees cannot be counted in the enterprise's carbon budget toward Carbon Active certification. This is despite there being well established methods for measuring and/or modelling this carbon removal by stands of trees.

PFT is aware that Climate Active has very recently released a new draft *Guideline: Accounting for Carbon Sequestration from Tree Plantings* for public consultation. While this is a positive move, the draft Guideline only includes new plantings on greenfield sites after 1990. Other forest types, both native forest and older pre 1990 plantations, also sequester carbon and can make a positive contribution to an entity or products carbon budget. These should also be included in any changes that allow for the growing of trees to be included in Carbon Active carbon budget.

If you have any queries on the points we have raised, please contact me on 03 6165 4070 or Murray Root, Policy & Data Officer on 03 6165 4072.

Yours sincerely

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Penny Wells
CEO Private Forests Tasmania