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Project Manager
Accounting for Carbon Sequestration from Tree
Plantings
Climate Active

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Consultation - Accounting for Carbon Sequestration from Tree Plantings

Thank you for the opportunity to provide feedback on the draft *Guideline: Accounting for Carbon Sequestration from Tree Plantings* (draft Guideline). PFT have reviewed the draft Guideline and the associated consultation documents.

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.

PFT strongly supports the intent of the draft Guideline, which is to introduce a method for measuring carbon *sinks* in the form of trees within a Climate Active carbon account. The current situation, where the calculation and offsetting of CO₂e emissions that an entity may sequester annually through trees being grown by them was not able to be counted in their Carbon Active account, is unfair and counter-productive.

There are many farming enterprises and plantation management companies that have devoted some or most of their land to growing trees and choose not to, for whatever reason, register those trees as a carbon project under the Emission Reduction Fund. The proposed inclusion of tree plantings in the Carbon Active certification process gives those enterprises choices about how they want to use their carbon and provides further incentives to plant more trees in the landscape. The multiple benefits of trees, eg as a wood resource, provision of shade & shelter, enhanced biodiversity outcomes, farm resilience and carbon sequestration, will then grow through the landscape.

However, we believe there are still a number of ways to improve the draft Guideline. Currently it only allows for new plantings on greenfield sites established after 1990. Other forest types, both native forest and older pre 1990 plantations, also sequester carbon and make a positive contribution to an entity or product's carbon budget. These should also be included in any changes that allow for the growing of trees to be counted in a Carbon Active carbon budget. FullCAM is able to model these forest types and including them would make it consistent with the Australian National Greenhouse Accounts which account for all forest types, not just post 1990 plantations.



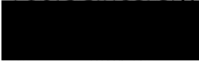
by **Private Forests
Tasmania**

Similarly, the draft Guideline appears only to allow the counting of a limited number of carbon pools within a tree planting activity. It does allow for above and below ground tree biomass and forest debris, but it doesn't count soil carbon or harvested wood product carbon. Again, FullCAM does model these additional carbon pools and they are included in the Australian National Greenhouse Accounts.

To mitigate perverse outcomes, such as unnecessary land clearing or poor forest health, we strongly recommend that these additional forest types and carbon pools should be included in the draft Guideline.

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,


Penny Wells

CEO Private Forests Tasmania