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Project Manager
ERF – Audits & Alternative Assurance Amendments
Clean Energy Regulator
Department of Industry, Science, Energy and Resources

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Emission Reduction Fund – Audits & Alternative Assurance Amendments

Thank you for the opportunity to provide input into the proposed amendments to the *Carbon Credits (Carbon Farming Initiative) Rule 2015* and the *Carbon Credits (Carbon Farming Initiative) (Audit Thresholds) Instrument 2015*.

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. Under our [Corporate Plan 2020-23](#) one of our goals is to work with policy makers and regulators to improve regulatory efficiency and practical policy settings for private forestry.

PFT supports the proposed amendments which are intended to reduce audit costs and hence remove some barriers to participation in the ERF for landholders undertaking low risk small-scale environmental plantings on their land. While welcoming the amendments, PFT would like to see these changes extended to other ERF methods, such as the Plantation Forestry Method and Farm Forestry Method. We are encouraged by the commitment given in the Consultation Paper by the CER to develop new classes of alternative assurance projects and we hope these will include the abovementioned forestry methods.

Small-scale farm forestry projects are particularly sensitive to the up-front ERF audit costs which can be in the tens of thousands of dollars for an initial audit. Reduced audit costs would therefore increase the commercial viability of small-scale forestry projects and increase participation in the ERF.

In Tasmania, forestry projects are generally low risk with regard the ERF because they already undergo a high level of regulatory scrutiny under the State's rigorous forest management system, particularly through the Forest Practices Code and the *Forest Practices Act 1985*. The same regulatory standards apply regardless of whether the land is public or privately owned.

Many of the larger plantations also have an additional level of oversight and audit through their membership of forest certification schemes such as Forest Stewardship Council (FSC) or Responsible Wood. The low risk nature of these plantations should be reflected in less prescriptive ERF rules and audit requirements.

The current alternative assurance amendments proposed by the CER will reduce the *number* of audits, but PFT hold that the existing level of regulatory oversight for plantations in our State provides a further opportunity to reduce the *scope* of some audits. We look forward to further engagement with the CER to assist in streamlining ERF processes, increase participation and reduce carbon emissions.

If you have any queries or need further expansion on the points raised above, please contact myself on 6165 4070 or Murray Root on 6165 4072.

Yours sincerely,



Penny Wells
CEO Private Forests Tasmania