

30 July 2021

Attention Monica Philalay
Project Manager – Plantation Forestry Method Review
Method Development, Clean Energy Regulator

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Our Ref: D21/1321
Your Ref:

Draft Plantation Forestry Method - July 2021

Dear Monica

Thank you for the opportunity to provide further input to the plantation forestry method development process. Private Forests Tasmania (PFT) staff attended the 15 July co-design workshop and have reviewed the Draft Simple Method Guide and Draft Methodology Determination July 2021. PFT can provide the following comments on the updated documents:

In lieu of newness provisions (Page 8 of the Simple Method Guide & clause 27 of the Methodology Determination)

We support the introduction of the in lieu of newness measures which gives the plantation project manager a little more leeway and time to carry out legitimate site preparation and planting activities after the application is submitted but prior to formal project registration. We would however suggest the definition of 'site preparation' in clause 27(5) re-worded and expanded so it includes other standard site preparation activities so as to avoid any confusion about what can, and what cannot be done. For example the definition should include "mounding, fencing and browsing control" in addition to the other site preparation activities already included in the draft definition. There should also be a broad definition of planting which includes "purchasing seeds and seedlings, planting, seeding or coppicing".

Species restrictions in the conversion activity (Page 18 of the Simple Method Guide & Schedule 5 Part 3 of the Methodology Determination)

We support the introduction of category 3 species (ie. all species that are not named in category 1 or 2) which in effect potentially expands the list of species able to be grown as short or long rotations in a particular NPI region, subject to evidence of management intent. The types of evidence that the regulator could consider here are as follows:

- a.) A statement by a Registered Forestry Professional (RFP) that a species can be grown, or has been grown, as a long or short rotation (as the case may be) in the relevant NPI region.
- b.) Published papers or reports that demonstrate a species can be grown, or has been grown, as a long or short rotation (as the case may be) in the relevant NPI region. There are ample papers and reports relevant to a range of species and rotation lengths in Tasmania.
- c.) Other published material or information endorsed by a professional body or organization. In this regard PFT has published a [table of species suitable for Tasmania](#) along with their preferred growing conditions. Whilst the table of information does not specify short or long rotation suitability, the 'use' category can readily be translated to such.

Demonstrating additionality (Page 9-10 of the Simple Method Guide & clause 28 of the Methodology Determination)

We support the introduction of the new Schedule 4 Continuing plantation forestry activities, however we would caution against making the independent financial assessment required by clause 28(5) & 28(6) to be too onerous, particularly for small growers. Schedule 4 provides a new pathway for participation in the Method but if the hurdles become too great for smaller growers then they will continue to be dissuaded from participation. We suggest providing standardised financial assessment templates, one for large growers, and a simplified version for small growers whose capacity to do a detailed financial assessment may be limited.

Definition of a short rotation (Schedule 2, page 46 of the Methodology Determination)


We support the expansion of the eligible land definition in this Schedule to include an existing short rotation plantation that has been thinned or pruned for drought resilience, health or ecological purposes. PFT is aware of landowners in Tasmania where the previous restrictive definition of a short rotation excluded them from participation in the ERF. The only issue we have here is a reference to plantation health is missing from the last paragraph on page 46 of the Methodology Determination – clause XX(2)(c)(iii). We suggest that clause read as follows (missing reference inserted in red text):

*(iii) if paragraph (ii) applies, the proponent included a signed statement from an independent person that, in the opinion of the independent person, any thinning or pruning conducted was necessary and only for **the health of the plantation**, ecological or drought resilience benefits;*

While the above comments relate to the plantation forestry method, PFT would welcome further progress on issues that have been deemed out of scope of this review eg. method stacking, compressed crediting, measures that would facilitate aggregation and reducing the costs of audits. These issues continue to be a barrier to participation in the ERF particularly for small growers.

I look forward to further collaboration on the development of the new plantation forestry method.

Yours sincerely,

A solid black rectangular box used to redact the signature of Penny Wells.

Penny Wells
CEO Private Forests Tasmania