

Private Forests Tasmania submission to CER on ERF Integrated Farming Methodology

Response to consultation questions

Q. Do the proposed eligible management activities for Phase 1 of the draft IFM method create an appropriate framework for combining or 'stacking' multiple activities on the same property or aggregated properties that can be built on in Phase 2 of the method?

Response

The proposed eligible management activities for Phase 1 do not include a commercial tree planting option. The current draft only allows for environmental tree planting activities in Phase 1 with a note suggesting that plantation forestry will be considered in Phase 2. There is no timeframe given on when, or even if, phase 2 will proceed. In 2018 the Australian Government released a policy to plant a billion plantation trees by 2028 under the [Growing a Better Australia](#) plan to meet Australia's growing timber shortage. That equates to 400,000 hectares of new plantations over the decade.

Expanded farm forestry is the key to realising the billion trees plan. However, based on the current rate of new plantation establishment this target will not be met. Further policies and incentives are needed as a priority to move this forward and it was anticipated that the IFM method would provide one of those incentives. Delaying the introduction of plantation forestry until Phase 2 appears counter to the AGs billion trees plan. PFT recommends that a commercial tree planting option be introduced as a Phase 1 eligible activity.

PFT recognises the complexities of introducing all four of the existing Plantation Forestry Method project activities (schedules 1-4) into the current draft IFM and then meeting the CERs 12 month timeframe. However, by only including the schedule 1 activity, new plantation establishment, much of this complexity is avoided. Similarly, if the standalone measurement based Farm Forestry Method activity was also included as a Phase 1 activity then there would be both a measurement and modelled estimation approach available which would mesh very well with the architecture of the current draft IFM.

Q. For the activities that are covered by existing methods, are there barriers to uptake in existing methods that could be addressed in the IFM method while still meeting the offsets integrity standards?

Response

One of the main barriers to uptake of the existing Plantation Forestry and Farm Forestry Methods is the high project transaction costs. This is particularly the case with farmers who may only want to commit a part of their farm (10-50 ha) to growing commercial trees. The 'stacking' feature of the IFM goes some way to address this barrier by enabling the farmer to stack their 10-50 ha of commercial trees with a soil carbon activity into the same project. This reduces the per unit transaction costs and helps remove the barrier. However as stated in the above paragraphs, a commercial tree planting option is needed as an eligible Phase 1 activity.