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Land, Forest & Blue Carbon Methods Section
Department of Climate Change, Energy, the Environment and Water

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Reforestation by Environmental or Mallee Plantings 2014

Thank you for your email of 5 April and the opportunity to provide feedback on the proposal to remake the Reforestation by Environmental or Mallee Plantings (REMP) method under the Australian Carbon Credit Unit Scheme.

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. We do this through providing information to private forest growers, through research collaborations, advocacy, innovation and planning tools. Under our [Corporate Plan 2023-26](#) 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 makes the following recommendations:

1. Inclusion of plantation forestry activity in REMP

PFT recommends that DCCEEW incorporate plantation forestry as an eligible activity in the remade REMP method (alongside the existing 'mixed species environmental planting' and 'mallee planting'). This would enable commercial tree plantings to be 'stacked' with environmental tree plantings on the one property within a single project. PFT recognises the complexities of introducing all four of the existing Plantation Forestry Method project activities (schedules 1-4) into the remade REMP Method and meeting DCCEEW's short timeframe. However, by only including the schedule 1 activity, '*new plantation establishment*', much of this complexity is avoided. New plantation establishment activities would mesh well with the architecture of the current REMP and complement the existing 'mixed species environmental planting' and 'mallee planting' activities.

One of the main barriers to participation in the ACCU Scheme, particularly by smaller farmers, is the high project transaction costs. Farmers may want to commit a part of their farm such as hillslopes to plantation forestry and other parts such as riparian areas to permanent environmental plantings. An effective 'stacking' feature that coordinated application and audit

processes between the two activity types would go some way to address this barrier by reducing the per unit transaction costs and helping to remove the barrier.

The stacking of different activity types into a single project and other reforms that enable further participation in the ACCU scheme by smaller farmers were recommendations made by the King Review in 2020. The need for these changes are just as relevant today as they were back then.

The incorporation of a plantation forestry option into the REMP Method would also align with other government policies and programs. In 2018 the then 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 a decade. Expanding the farm forestry estate was one of the keys to realising the billion trees plan and in 2022 the Australian Government released its [Farm Forestry – Growing Together](#) strategy to give further momentum to these efforts.

The current Australian Government has all but adopted the previous Governments policy of expanding the plantation estate through its own *A Better Future for our Regions* and *A Future Grown in Australia* policies. They are supporting these policies by allocating \$73 million in the 2022–23 Budget to be used over four years from 2023–24 to support the establishment of new long-rotation softwood and hardwood plantation forests. However, further policies and incentives are needed as a priority to meet Australia's future timber needs and our ambitious emission reduction targets. Incorporating plantation trees as an eligible activity in the remade REMP Method would help achieve these multiple government objectives.

2. Ability to selectively harvest trees for commercial purposes

PFT recommends that consideration be given to adding the ability to selectively harvest trees for commercial purposes into the mixed species environmental planting activity. The current method already allows for vegetation to be thinned for ecological purposes and this could be extended to the commercial harvest of selected trees with appropriate constraints and limitations on the type of calibration used.

If you have any queries on the points we have raised, please contact me on [REDACTED] or our Policy & Data Officer Murray Root on [REDACTED].

Yours sincerely,




Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania