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INCOMPLETE

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Page 3: Personal information

Q1

Please provide the following.

Name of your organisation (if applicable): **The Carbon Farming Foundation**
Full name of the best contact person for this consultation submission: **Samuel Bean**
Phone number of the contact person: [REDACTED]
Email address of the contact person: [REDACTED]

Q2 **Agriculture methods,**
Vegetation methods
 If applicable, which ACCU Scheme method areas does your organisation participate in?

Q3 **No**
 Do you want this submission to be treated as confidential?

Page 4: Consultation question 1 - Subsequent audits

Q4 **Unsure**
 Should the audit thresholds be changed to better support a risk-based approach to compliance?

Q5
 Please specify why you answered 'yes', 'no' or 'unsure' in your previous answer and include relevant evidence.

 The projects we are associated with are often not of sufficient scale to exceed Threshold A. We have not encountered a scenario where the audit thresholds have felt inappropriate, and therefore we are satisfied that the audit thresholds suitably support a risk-based address to compliance.

Q6 **No**
 Should the number of subsequent audits required for projects that meet each threshold be changed to better support a risk-based approach to compliance?

Q7

Please specify why you answered 'yes', 'no' or 'unsure' in your previous answer and include relevant evidence.

The projects we are associated with are often not of sufficient scale to exceed Threshold A. We have not encountered a scenario where the audit thresholds and associated annual average abatement amount has felt inappropriate, and therefore we are satisfied that the number of subsequent audits required for meeting each threshold suitably support a risk-based address to compliance.

Page 5: Consultation question 2 - Trigger audits

Q8

Yes

Should the trigger audit threshold be changed to better support a risk-based approach to compliance?

Q9

Please specify why you answered 'yes', 'no' or 'unsure' and include relevant evidence.

The projects we are associated with are unlikely to exceed the trigger audit threshold, mainly due to a combination of the size of these project and the requirement for projects to report on periods no greater than 5 years. Combined, modelled yields (using FullCAM) are unlikely to exceed the trigger audit threshold. If they were to exceed this, we believe the requirement for a trigger audit at this point would be appropriate to ensure the abatement is compliant. We are therefore satisfied that the trigger audit thresholds suitably support a risk-based address to compliance.

Page 6: Consultation question 3 - Alternative assurance

Q10

Yes

Should alternative assurance arrangements be extended to the new reforestation by environmental or mallee plantings method?

Q11

Please specify why you answered 'yes', 'no' or 'unsure' in your previous answer and include relevant evidence.

We have engaged with 4 landowners who have successfully been able to register and undertake Reforestation method projects due to alternative assurance provisions (when they otherwise would not have been able to due to cost barriers).

We have also recently hosted a webinar to inform landowners of the changes evident in the 2024 Reforestation method. Alternative assurance measures dominated the conversation, so we are still seeing a strong interest in these. We also have a number of landholders with smaller property sizes (50-300Ha) who are unable to develop a viable project at present and are therefore waiting on the renewal of these measures for the new method.

Ultimately, we do not believe the alternative assurance measures are negatively impacting project compliance, and therefore encourage their re-introduction.

Q12

Yes

Are any changes required to the arrangements?

Q13

Please specify why you answered 'yes', 'no' or 'unsure' in your previous answer and include relevant evidence.

We are largely satisfied with the provisions of the existing arrangement. However, we request the CER consider whether expansion of the maximum size cap could be increased to 300Ha. We do not believe that such an increase would have a detrimental impact on risk, but it would expand abatement potential.

Additionally, we request the CER consider whether the ownership provision could be expanded to allow for multiple landowners to participate under an aggregated model. We do not believe that the administrative burden on the Regulator to verify these relationships at registration would be significant, but it would enhance the viability for small landowners to participate.

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Q14

Do you have any additional comments or feedback?

We would like to thank the Clean Energy Regulator for the opportunity to provide feedback on the Audit Thresholds Instrument.
