



Draft Audit Thresholds Instrument 2025 consultation

Coversheet for submissions

Contact details	
Name of organisation	GreenCollar
Contact person	Hugh Wareham
Phone number	[REDACTED]
Email	[REDACTED]
Postal address	The ASN Co Building, 3 Hickson Rd, The Rocks NSW 2000
Do you want this submission to be treated as confidential? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

Submission instructions

Submissions are due by 5 pm AEDT Wednesday 5 February 2025. Any submissions received after this date will be considered at the discretion of the Clean Energy Regulator (the agency). You can email your submission to StrategyCoordination@cer.gov.au. Please include this coversheet with your submission.

Confidentiality and privacy

The Clean Energy Regulator will treat all submissions as public documents, unless the author requests the submission be treated as confidential. Public submissions may be published in full on the Clean Energy Regulator's website. If published, the submission will include the individual's or organisation's name along with the relevant state or territory.

A request may be made under the *Freedom of Information Act 1982* (Cth) for a submission marked 'confidential' to be made available. Such requests will be determined in accordance with provisions under the *Freedom of Information Act 1982*.

The agency will deal with personal information contained in, or provided in relation to, submissions in accordance with the [privacy policy](#).

5 February 2025

Clean Energy Regulator
GPO Box 621
Canberra ACT 2601
email StrategyCoordinator@cer.gov.au

Dear Strategy Coordination Team,

Re: Carbon Credits (Carbon Farming Initiative) (Audit Thresholds) Instrument 2025 (“Draft Instrument”)

Thank you for the opportunity to provide comments on this Draft Instrument. A copy of GreenCollar’s submission to the initial round of public consultation is attached. Those submissions are reiterated with specific comments in relation to the Draft Instrument subsequently released for comment provided below.

Flexibility to defer or postpone audits: The CER has indicated it will review its guidance to better clarify this flexibility. Can the CER provide an understanding of when this will occur?

Criteria for low-risk environmental planting projects: The Draft Instrument indicates that these criteria will not be adjusted to apply to proponents other than owner, leaseholder or native title holder (which would be consistent with other carbon methods). The notes on the Draft Instrument provide a brief response to submissions (including GreenCollar’s) in relation to this aspect indicating the CER’s view that this change “would reduce focus on the intent of encouraging small landholders to participate.” We respectfully submit that is not a reasonable or adequate response.

In reality, what the restriction does is to unreasonably constrain the choice of landholders as to how they participate in the Scheme by penalising those landholders who choose to participate by engaging carbon service providers as specialised partners. Landholders choose to engage specialists for many reasons in many areas of their enterprises. In our experience, landholders often choose to partner with us to allow them to continue to build their productive enterprise while also integrating carbon project/s into their business. Encouraging participation in the method (and the Scheme more broadly) would be supported by expanded choice rather than inclusion of arbitrary barriers that result in limiting choice of landholders as to how to best build their on-farm businesses.

Again, thank you for the opportunity to provide these responses and comments.

Yours sincerely

A handwritten signature in black ink, appearing to read "Nerida Bradley".

Nerida Bradley
Chief Impact Officer

P: [REDACTED]
E: [REDACTED]
W: www.greencollar.com.au02