

# #25

**COMPLETE**

**Collector:** Live (Web Link)  
**Started:** Monday, February 03, 2025 8:22:18 AM  
**Last Modified:** Monday, February 03, 2025 9:09:49 AM  
**Time Spent:** 00:47:31

---

Page 3: Personal information

**Q1**

Please provide the following.

Name of your organisation (if applicable):	<b>Nexsys Industries Consulting</b>
Full name of the best contact person for this consultation submission:	<b>Scott McArdle</b>
Phone number of the contact person:	<b>[REDACTED]</b>
Email address of the contact person:	<b>[REDACTED]</b>

---

**Q2**

If applicable, which ACCU Scheme method areas does your organisation participate in?

**Agriculture methods,  
Energy efficiency methods,  
Landfill and waste methods,  
Transport methods,  
Vegetation methods**

---

**Q3**

Do you want this submission to be treated as confidential?

**No**

---

---

Page 4: Consultation question 1

**Q4**

Do you think the Draft Instrument strikes the right balance between supporting participation and abatement, ensuring integrity of abatement, and facilitating a risk based approach to compliance?

**Yes**

---

**Q5**

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

The draft instrument provides continuity in assurance between the EMP Pilot and the new 2024 method. This is crucial for proponents seeking confidence to proceed in EMP plantings. As they are a low risk method, the draft supports ongoing participation in a project that, apart from ACCUs sold, would not be likely to see future income, and thus, a alternative audit process with zero cost to proponents for small projects is suitable.

Given that under the ACCU Scheme Auditors hold the liability for issuance under their audit activity, it is appropriate that the Federal Government hold the liability for ensuring integrity of what is really (at its core) an environmental improvement method - with a very clear baseline C threshold. This is risk based at its core, low risk, low cost, and minimising additional layers of prohibitive regulation/audit.

---

Page 5: Consultation question 2

**Q6**

**No**

Are there any integrity risks that have not been considered in the Draft Instrument?

---

**Q7**

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

None are evident. The C baseline is very clear - no forest to forest. With both reporting arrangement in place and alternative assurance processes suitable to the method, there is a high likelihood of integrity being maintained in these projects.

---

Page 6: Consultation question 3

**Q8**

**No**

Is there any other evidence that we have not considered that would support changes to the audit requirements proposed under the Draft Instrument?

---

**Q9**

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

Relevant evidence and response to feedback evident in draft instrument.

---

Page 7: Consultation question 4

**Q10**

Do you have any further feedback to provide on the Draft Instrument or alternative assurance arrangements for low-risk environmental plantings 2024 projects?

Thankyou for responding to the evidence and risk profile of EM projects and retaining the assurance from the pilot. Many farmers and project proponents will now be able to proceed with planned plantings.

---