

# #20

**COMPLETE**

**Collector:** Live (Web Link)  
**Started:** Thursday, January 30, 2025 5:29:32 PM  
**Last Modified:** Thursday, January 30, 2025 5:37:19 PM  
**Time Spent:** 00:07:46

---

Page 3: Personal information

**Q1**

Please provide the following.

Name of your organisation (if applicable):	PF Olsen
Full name of the best contact person for this consultation submission:	Sara Gipton
Phone number of the contact person:	[REDACTED]
Email address of the contact person:	[REDACTED]

---

**Q2**

**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

**Q4**

**Yes**

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?

---

**Q5**

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

Removes the unnecessary administrative burden of additional audits that smaller projects bare which are a disincentive to participate. Furthermore, remote sensing and digital tools mean that the CER can gain assurance that trees are going without the need for on site audits. This is particularly true for plantations where the plantings are uniform and evenly spaced.

---

Page 5: Consultation question 2

**Q6**

**Yes**

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.

Mallee plantings appear excluded by the draft instrument as the alternative assurance pathway only applies to 'mixed species block plantings'. Mallee plantations would be easier to undertake remote sensing and geospatial analysis given that blocks of the same species are planted at the same time. No reason for excluding them has been provided.

---

---

Page 6: Consultation question 3

**Q8**

**Yes**

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.

We can provide evidence (confidentially) of the use of aerial photography and geospatial analysis in single species mallee plantation carbon projects under the Enviro-mallee method which would support alternate assurance pathways for these types of projects.

---

---

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?

It is likely that remote sensing, satellite imagery and other spatial analysis tools will evolve over the next few years. The instrument renewal timetable should allow for quicker review to ensure that project proponents are encouraged to take up emerging efficient technology which can also be used by the CER to gain assurance as the presence and growth of the carbon projects.

---