



Audit Thresholds Instrument consultation

Coversheet for submissions

| Contact details | |
|--|--------------------------|
| Name of organisation | Private Forests Tasmania |
| Contact person | Murray Root |
| Phone number | ██████████ |
| Email | ████████████████████ |
| Postal address | |
| 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, Sunday 15 December 2024. Any submissions received after this date will be considered at the discretion of the Clean Energy Regulator. 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](#).

13 December 2024

Strategy & Coordination Branch
Clean Energy Regulator

StrategyCoordination@cer.gov.au

Inquiries: Dr Elizabeth Pietrzykowski

Phone: [REDACTED]

Email: [REDACTED]

Our Ref: PFT24/706

Your Ref: [\[Click to enter text\]](#)

Proposed new Audit Thresholds Instrument

Thank you for your email of 15 November 2024 and the opportunity to provide feedback on the proposed new Audit Thresholds Instrument 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 2024-27](#) 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 has reviewed the consultation paper and provides the following response to consultation question 3:

Question 3. Should alternative assurance arrangements be extended to the new reforestation by environmental or mallee plantings method and, if so, are any changes required?

PFT strongly supports alternative assurance arrangements being extended to REMP 2024. Small-scale reforestation projects are particularly sensitive to audit costs which can be in the tens of thousands of dollars for an initial and then subsequent audit. The use by the CER of geospatial tools and other measures as 'alternative assurance' is now proven to be effective for low-risk projects. Reducing the number of physical audits will significantly reduce overall audit costs and therefore increase the viability of small-scale projects leading to a likely increase in plantings and participation in the ACCU Scheme.

PFT believed these arrangements had already been carried forward from the old REMP 2014 into the new method. However, if that is not the case they should be included at the first opportunity.

We look forward to further engagement with the CER to assist in streamlining ACCU Scheme processes, increase participation and reduce carbon emissions. 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,

A handwritten signature in black ink, appearing to read 'E. Pietrzykowski', with a stylized flourish at the end.

Dr Elizabeth Pietrzykowski
CEO Private Forests Tasmania