

#3

COMPLETE

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Page 3: Personal information

Q1

Please provide the following.

Name of your organisation (if applicable): Quentic
Full name of the best contact person for this consultation submission: Christophe Bur
Phone number of the contact person: [REDACTED]
Email address of the contact person: [REDACTED]

Q2

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

Q3

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

Page 4: Consultation question 1 - Subsequent audits

Q4

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

Q5

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

For Agriculture and vegetation methods the audits are a major - if not the biggest - obstacle to adoption on smaller properties (100 to 1000Ha). For many of these projects the annual abatement is often an order of magnitude lower than the current 'small' threshold. These projects are of an entirely different type from a project with for example a 40,000 annual abatement.

Q6

Should the number of subsequent audits required for projects that meet each threshold be changed to better support a risk-based approach to compliance? **Yes**

Q7

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

For the same risk and adoption reason as above, a set number of audits does not match the risk profile of smaller projects.

Page 5: Consultation question 2 - Trigger audits

Q8

Unsure

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

Q9

Respondent skipped this question

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

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.

From our customer base only, the alternative assurance arrangements increased the number of projects undertaken by landowners by a factor of three. The calibrations settings are relatively conservative, the risk of project failure (establishment etc) is very low in the region where we operate (SEQ), and the alternative arrangements are perfectly adequate to manage such projects.

Q12

No

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.

An increase in the size threshold seems possible.

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Q14

Do you have any additional comments or feedback?

The extension of alternative arrangements to all methods for projects under a certain FAE is highly desirable. It keeps the option open for an audit to be conducted by the CER at its initiative, and otherwise keeps overhead low for all parties.
