Australian Government
Clean Energy Regulator

Running a Nature Repair Market scheme project alongside an ACCU Scheme project – questions and answers

This document contains the questions and answers provided during the Be ACCUrate webinar held on 11 December 2025. You can access a recording of the presentations from this webinar[1] on our YouTube channel.

The information provided in this document was accurate at the time of the webinar and is subject to change.

What evidence is required - or can be used - to show the land has been clear of forest for at least five years of date of application?

As set out in the Nature Repair Market scheme Replanting Native Forest and Woodland Ecosystems method (the replanting method), when submitting an application to register a project, the proponent must provide details and supporting evidence to show that each activity area was comprehensively cleared within the required timeframe: at least 7 years before the application date if ownership hasn't changed, or at least 5 years if it has. Evidence could include dated satellite or aerial imagery or vegetation cover data confirming no forest canopy during that period. In practice, this information would be collated by the suitably qualified person and provided as part of the site assessment.

Platform for Land and Nature Repair - PLANR

You can also use PLANR, a free online mapping tool. It has 2 tools to help proponents gather information about historical vegetation cover on their proposed project site:

- History of Tree and Ground Cover: Use this tool to investigate your proposed activity area and provide evidence.
- Mapping tool: Use this to map your project area, then turn on the ACCU Scheme Environmental Plantings eligibility layer. This will reveal indicative eligibility under the replanting method.

Both tools draw on the National Forest and Sparse Woody Vegetation dataset and may be an appropriate form of evidence in combination with a field visit site assessment conducted by a suitably qualified person.

For more detailed information on how to use PLANR read PLANR guidance - quick reference guide.[2]

[1] https://www.youtube.com/watch?v=9wj7LfPCJ6k
[2] https://www.dcceew.gov.au/environment/environmental-markets/nature-repair-market/publication/planr-guidance-quick-reference-guide

CLEAN ENERGY REGULATOR

Do planting plans need to be approved by an NRM body (or similar?)

Under the Nature Repair Market scheme, environmental plantings undertaken as part of the replanting method are not required to be approved by a Natural Resource Management (NRM) organisation.

The Clean Energy Regulator (CER) is responsible for assessing applications to register a project under the replanting method. This assessment includes checking that a suitably qualified person has undertaken and certified the starting state assessment. Proponents must also ensure that any planned plantings also comply with any local or state laws.

NRM organisations, along with other similar organisations, can support proponents by providing project planning support, offering guidance on site selection, ecological connectivity and local law compliance. NRM organisations can have an important Nature Repair Market scheme role as enablers and knowledge brokers, rather than regulators. Regulatory responsibility sits with the CER.

In order to stack projects, do the ACCU and Nature Repair Market projects need to be registered concurrently?

Stacking may be possible where the requirements of both schemes are met. We recommend submitting your Australian Carbon Credit Unit (ACCU) application before submitting your Nature Repair Market scheme application.

We recommend you speak to our team if you are considering running a stacked project. You can email us at naturerepairmarket@cer.gov.au.

Can the starting state assessment be conducted with internal expertise or does this need to be done independently?

The Nature Repair Market scheme replanting method does not preclude the use of an internal suitably qualified person. The replanting method defines a suitably qualified person as a person who has:

- an appropriate qualification in ecology, botany, or another subject relevant to the project
- at least 3 years of post-qualification experience working as an ecologist, botanist, or in another profession relevant to the project
- worked in that profession within the previous 3 years.

Regarding streamlined auditing for stacked projects, does this mean that projects can have a single audit, or that two audit reports would still be undertaken and published, but by the one auditor?

Audits may be aligned across the Nature Repair Market and ACCU Schemes. Separate audit reports are required for each scheme however you can engage a single auditor to complete audits for both schemes. Specific arrangements will depend on the auditor you engage and requirements of each project.

Could current EP ACCU methods be eligible to stack biodiversity outcomes if additional planting could meet biodiversity standards?

If you undertake additional plantings and activities under the Nature Repair Market scheme replanting method, you may be eligible to stack this project with an existing project under the Reforestation by Environmental or Mallee Plantings (REMP or EP) method under the ACCU Scheme. Eligibility of a stacked

project must be assessed on a case-by-case basis. If you're considering a stacked project, contact our team before starting any related activities to discuss your specific circumstances.

You can email us at naturerepairmarket@cer.gov.au.

If there is a conflict between the reference ecosystem and the 200 stems per ha REMP requirement, does one trump the other or exclude a stacked program?

Under the Nature Repair Market scheme replanting method, stem density must align with the reference ecosystem identified during the starting state assessment by a suitably qualified person.

Where requirements under the replanting method differ from the minimum 200 stems per hectare requirement under REMP (also known as EP), you may consider stratifying activity areas into separate ACCU and Nature Repair areas. If requirements are irreconcilable, stacking may not be feasible for that area.

What is the clawback mechanism if a project no longer meets the certificate threshold after a certificate has been issued? Under the ACCU Scheme, if it is an "avoidable reversal" (to borrow from ACCU Scheme), the CER might apply a CMO, but it's not clear to me what happens under a Nature Repair Market project. If for example there was an avoidable fire in the project area, would the penalty apply to the ACCU project, the Nature Repair Market project or both?

Under the ACCU and Nature Repair Market schemes, you must notify the CER as soon as possible if there is an event which causes a significant change to your project. Notify us using Notify the Regulator in Online Services.[3]

In the case of a natural disturbance (for example, a bushfire) in a Nature Repair project area, a proponent may choose to continue or cancel the project.

Continue with project

If the proponent chooses to continue with the project, they are required to take reasonable steps to ensure that the lost biodiversity is re-established so that biodiversity outcome can still be met. This may be through activities such as remedial planting or the extension of the project's permanence period.

Cancel project

If the proponent wishes to cancel the project and the project has not been issued a biodiversity certificate, the proponent may cancel the project by applying to the Regulator.

If a biodiversity certificate has been issued, the proponent will be required to relinquish the related biodiversity certificate for that project. If the proponent no longer owns the certificate, they will need to reacquire the certificate or relinquish one or more equivalent biodiversity certificates.

If the proponent does not comply with certificate relinquishment requirements, the CER may issue a biodiversity maintenance declaration.

[3] https://onlineservices.cer.gov.au/

Can this project registration be held against a title of a property in case of death or sale bringing it to an early close and the land transfers hands?

Under the Nature Repair Market scheme, project obligations remain tied to the land. Selling the property does not cancel the project. The obligations under the scheme continue unless the project is cancelled or the obligations are transferred to another project proponent.

In the case of a property sale, the property purchaser may choose to either:

1. Continue the project by taking over as the project proponent. This requires the existing proponent to transfer their obligations to the purchaser. The purchaser must then demonstrate that they meet the requirements of a project proponent. This includes that they are a fit and proper person and that they have the right to carry out the project.
2. Provide consent to the project proponent to continue with project activities for the remainer of the nominated permeance period for the project.

The registered project proponent remains responsible for project obligations until the project is either withdrawn or the obligations of the registered project proponent are transferred to another party. This includes maintaining biodiversity outcomes and meeting reporting requirements until the transfer is complete.

Information on the sale of ACCU Scheme project property[4] and estate management in case of death[5] for ACCU Scheme assets is available on the CER website.

How are biodiversity certificates valued? Does the value vary by land area? Can ACCU and biodiversity certificates that are stacked be sold to different buyers or are they tied together?

Biodiversity certificates are personal property and can be bought, sold, or traded. Certificates will contain project specific information such as biodiversity outcomes that may be used by buyers to value certificates.

Certificate prices are influenced by supply and demand between buyers and sellers in the market, similar to carbon credits under the ACCU Scheme. A proponent may choose to sell the ACCU credits and a Biodiversity Certificate from a stacked project together or separately.

Businesses or persons who buy or sell biodiversity certificates must comply with the obligations under Australian Consumer Law when making environmental and sustainability claims. These claims must be true and accurate and not likely to give buyers the wrong impression.

What mechanism will drive the value in biodiversity certificate trading. i.e. why would someone buy a biodiversity certificate?

There are a number of potential drivers for investment in projects. These include:

- creating another way for people and organisations to invest in high-integrity projects

[4] https://cer.gov.au/schemes/australian-carbon-credit-unit-scheme/how-to-participate/making-changes-to-your-project/selling-or-buying-accu-scheme-project-property
[5] https://cer.gov.au/schemes/australian-carbon-credit-unit-scheme/how-to-participate/making-changes-to-your-project/estate-management-for-executors

- meeting the increasing demand for nature investment opportunities (read more Investing in nature[6])
- carbon market participants seeking projects that also benefit nature.

The Platform for land and Nature Repair (PLANR[7]) is a free online tool to support people participating in environmental markets. Potential buyers and landholders can create project listings on PLANR Marketplace.[8] Project listings can include details about the environmental outcomes offered or sought. Users can search the marketplace and contact listing owners through the platform.

Does the rule regarding reaching full forest cover by 25 years cover the whole project area - or is there a percentage required to meet full forest cover? Noting some vegetation, ecosystems are slower growing than others.

Under the Nature Repair Market scheme replanting method, for each activity area or sub-area, the environmental plantings must introduce an appropriate combination of species from the canopy layer, mid-story layer and ground layer that collectively are capable of achieving forest cover within 25 years.

The planting must also be likely to result in the structure and composition of a forest that is consistent with the reference ecosystem for the activity area or sub-area.

Forest cover is defined by the replanting method.

Land has **forest cover** if the vegetation on the land includes trees and shrubs that:

a) are 2 metres or more in height

b) provide crown cover of at least 20% of the land.

Is it an option to register a REMP project with the CER and in the 90-day approval period work on the starting state assessment for the Nature Repair Market part of the project and then go through the process of registering this?

It may be beneficial to undertake the starting state assessment before registering an ACCU project, as the requirements of both schemes (and data gathered through the starting state assessment) may influence the planning, design and eligibility of each project. For example, the Nature Repair Market scheme replanting method requires the starting state assessment to be undertaken during an optimal growth period to maximise the potential to identify species. Requirements like this can fall outside the 90-day ACCU project approval period and disrupt project timelines, so they should be considered in project and submission planning.

However, you may choose to undertake the starting state assessment required by the replanting method during the 90-day ACCU project approval period.

[6] https://www.dcceew.gov.au/environment/environmental-markets/investing-in-nature
[7] https://planr.gov.au/
[8] https://planr.gov.au/marketplace

If an ACCU project has been registered in the last 12 months and just started planting, can the project still be registered under the nature repair method?

You may be able to stack an existing ACCU Scheme REMP project with a new project under the Nature Repair Market scheme replanting method but there are important conditions including timing and eligibility risks.

We recommend you speak to our team if you are considering stacking projects. You can email us at naturerepairmarket@cer.gov.au.

Is there a minimum size for a Nature Repair Project? and how far apart are projects permitted to be?

Under the Nature Repair Market scheme replanting method, each activity area or sub-area must be at least 0.2 hectares. The combined activity areas must be at least 5 hectares. While there are requirements for the dimensions of the activity areas, there are no requirements for separation distances between activity areas.

Can activity areas in the Replanting Method be amended/re-stratified similar to Carbon Estimation Areas (CEA) in the ACCU scheme? ie - if a CEA needs to be amended in a REMP project, can the activity area also be amended to align? Does this affect the biodiversity certificate?

Under the Nature Repair Act 2023, a proponent may apply to the CER to vary the project area of a registered project, however, the Nature Repair Market scheme replanting method does not currently include provisions to re-stratify activity areas after registration.

Please speak to our team if you need to re-stratify your project. You can email us at naturerepairmarket@cer.gov.au.

So technically stacking is allowed with mallee ACCU projects, but these projects would not meet the target outcomes/reflect reference ecosystems for Nature Repair, so should they be explicitly excluded to avoid confusion?

Stacking a project under the Nature Repair Market scheme replanting method with a mallee ACCU project may be possible if the species are aligned with the relevant reference ecosystem and the project is in the eligible regions. Reference ecosystems are assigned by a suitably qualified person during the starting state assessment.

We recommend you speak to our team if you are considering stacking projects. You can email us at naturerepairmarket@cer.gov.au.

Can an environmental replanting project under Nature Repair Market be used as an offset under EPBC Act. And could other methods be used as an offset under EPBC Act?

Biodiversity certificates issued under the Nature Repair Market scheme replanting method cannot be used as regulatory environmental offsets.

Recent changes to the *Nature Repair Act 2023* mean a future method could allow for projects to be used as offsets, where they meet specific requirements. Information about methods currently under development is

available on the Department of Climate Change, Energy, the Environment and Water's website: Methods for the Nature Repair Market.[9]

How will 'variable Biodiversity Project Characteristics' be scored by the CER? do these have to be nominated in the original project registration? and will these characteristics influence the issuance of a certificate or are they considered separately?

Variable biodiversity project characteristics provide a standardised way to describe different types of biodiversity benefits that a project intends to deliver. They support buyers to make informed decisions when purchasing certificates, and the CER to assess progress towards a biodiversity outcome.

These characteristics are not scored by the CER, instead, proponents report starting and forecast project-level scores for each relevant variable biodiversity project characteristic determined by the method. Proponents will report progress against assigned indicators for each characteristic, to the CER over the life of the project.

Biodiversity certificates can be issued once the CER is satisfied that the *threshold value* (level of change that is sufficient where the biodiversity outcome for the project is likely to be achieved) for each indicator has been met.

There are two variable biodiversity project characterises for Nature Repair Market scheme replanting method:

- Ecosystem condition is a mandatory characteristic and must be nominated at project registration.
- Culturally Significant Entities are optional and can be nominated at registration or added later through a project plan update.

For more details on variable biodiversity project characterises see Biodiversity Assessment Instrument.[10]

Is there a map showing the coverage of FullCAM data or how do we know if the area has FullCAM coverage?

FullCAM applies to terrestrial areas within Australia that have vegetation and soil data included in its primary library. The easiest way to confirm coverage is to use the FullCAM Tool[11] provided by the department. You can input coordinates or upload shapefiles, and the tool will indicate if the area is supported.

Once a certificate is sold, who would own the liability if the certificate no longer meets the target outcomes and whose responsibility is it for ongoing monitoring/submission of project reports?

Responsibility for ongoing project delivery stays with the project proponent for the duration of the permanence period. This includes project obligations that include monitoring, reporting, audits and notification requirements. During this period, the CER will assess project compliance with legislative and

[9] https://www.dcceew.gov.au/environment/environmental-markets/nature-repair-market/methods-for-the-nature-repair-market
[10] https://www.dcceew.gov.au/environment/environmental-markets/nature-repair-market/biodiversity-assessment-instrument
[11] https://www.dcceew.gov.au/climate-change/publications/full-carbon-accounting-model-fullcam

method requirements, review project monitoring and reporting, and take regulatory actions where non-compliance is identified.

If a proponent has sold a certificate that is later required to be relinquished, the proponent would need to either reacquire the original certificate or obtain one or more other certificates that meet the equivalence criteria for relinquishment (see section 151 of the Act).

Proponent's must notify the CER of any changes to the project including if the project no longer meets its biodiversity outcome. Notify us of changes using Notify the Regulator in Online Services.[12]

Is cultural burning permissible under the REMP?

Under the ACCU Scheme, cultural or prescribed burning can be represented in FullCAM and is permissible where reported correctly and consistently with the method and permanence plan.

Well-planned and conducted cultural or prescribed burning could have a significantly lower impact on credited carbon stores over the life of the project than an uncontrolled bushfire.

Are there plans for a simplified process that encourages proponents to engage in both schemes and makes stacking easier (i.e. forms / plans etc?), rather than doing each scheme concurrently?

The Nature Repair Market and ACCU Scheme, have their own requirements, forms and approval processes. While both schemes can allow for stacking of benefits, where eligible proponents engaging in both schemes will need to meet the obligations of each scheme and respective methods.

We acknowledged the importance of streamlining, reducing duplication and regularly look for opportunities to improve user experience. As part of this, the CER is developing guidance materials and templates to assist scheme participants in understanding stacking in relation to the Nature Repair scheme, as well as other requirements.

We are keen to hear from scheme participants to help to guide and improve the way that we administer both schemes. If you would like to share your experience, you can email us at naturerepairmarket@cer.gov.au.

Replanting Nature Repair method requires no damage to native vegetation 3 years prior to registering a project, does this include natural disasters i.e. wildfire? Is there an acceptable level of damage?

Under section 19(6) of the Nature Repair Market scheme replanting method, within the 3 years preceding the application date, any native vegetation on the land must not have been damaged or destroyed by mechanical or chemical means. This provision does not include natural disturbances such as wildfire, flood, or drought.

[12] https://onlineservices.cer.gov.au/