



Draft Audit Thresholds Instrument 2025 consultation

Coversheet for submissions

| Contact details | |
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| Name of organisation | Westernport Region Water Corporation (Westernport Water) |
| Contact person | Zoe Geyer |
| Phone number | [REDACTED] |
| Email | [REDACTED] |
| Postal address | 2 Boys Home Road, Newhaven 3925 Victoria |
| 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 Wednesday 5 February 2025. Any submissions received after this date will be considered at the discretion of the Clean Energy Regulator (the agency). 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](#).



6 February 2025

Strategy and Coordination
Clean Energy Regulator
By email: StrategyCoordination@cer.gov.au

Re: Consultation submission for the Draft Carbon Credits (Carbon Farming Initiative) Audit Thresholds Instrument 2025

Further to the public and stakeholder consultation paper and Draft Carbon Credits (Carbon Farming Initiative) (Audit Thresholds) Instrument 2025, Westernport Water would like to register our support for the proposed alternative assurance arrangements for Low risk projects under the Environmental Plantings-FullCAM Methodology Determination 2024.

As a smaller scale and regional water corporation seeking to respond to customer feedback for advanced action on local environmental outcomes and climate action, we have strategic goals to initiate Environmental Plantings projects on our own landholdings. All potential strategic projects fall within category 3 of the proposed alternative assurance criteria, namely Threshold A (small), under 200 hectares, utilising the mixed species block planting using FullCAM, and subject to geospatial tool monitoring by the Clean Energy Regulator. Initial explorations into participating in the ACCU scheme have indicated the ongoing conditions for operating, monitoring and reporting could be cost prohibitive to our scale of corporation. We support the alternative assurance arrangements for Low risk Environmental Plantings 2024 projects as the proposals will enable us to deliver our strategic goals, improve environmental outcomes and advance climate action, and meet customer expectations while minimising impacts to customer bills.

We welcome any further discussion to assist in supporting the Carbon Credits (Carbon Farming Initiative) Audit Thresholds Instrument 2025.

Kind Regards,

Zoe



Zoe Geyer (She/Her)

Climate Change senior advisor