

#5

COMPLETE

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Page 3: Personal information

Q1

Please provide the following.

Name of your organisation (if applicable): Woodland Services & Consulting
Full name of the best contact person for this consultation submission: Dr Dan Wildy
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 - Subsequent audits

Q4

Unsure

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

Q5

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

I do not wish to comment on this aspect

Q6

Unsure

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

Q7

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

I do not wish to comment on this aspect

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

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

I do not wish to comment on this aspect

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.

We are involved in implementing and reporting on both large and small reforestation projects for a variety of owners of ACCU projects in rural Western Australia.

We have taken the time to comment on this purely because we see it as the only mechanism for (i) landholders to carry out viable small to modest sized reforestation projects and (ii) for landholders to be involved in the scheme without needing to be tied up with long term deals with large corporate carbon companies.

From my point of view, the alternative assurance arrangements have delivered additional high quality reforestation in projects that are entirely in the hands of the landholders.

As you know, the audit requirements (for larger projects outside of the Alternative Assurance arrangements) create a 'fixed cost' floor to carrying out a project, and this was a very effective barrier to small, well meaning proponents carrying out reforestation projects on their own properties. Typically in our part of the world it was a case of saying to potential proponents "it won't stack up unless the project is over 1000ha". Even large farmers struggle with the idea of revegetating 1000 ha for many reasons.

When the Alternative Assurance arrangement was created for small landholders, this opened up an opportunity for them to finally participate. Every year since then we have been involved in assisting in registering projects for landholder proponents with projects of less than 200 ha under this arrangement.

We see it as very beneficial and exactly what the CFI scheme was originally intentioned for - allowing people to carry out well-targeted revegetation and be paid for this through the associated carbon abatement.

The Alternative Assurance arrangement is also beneficial because it generally circumvents the need or desire for long term two-party deals between carbon service provider and landowners. These are generally complex and a barrier in themselves.

We see the Alternative Assurance arrangement as an entirely good and positive action by the Regulator and see no reason why it should not be carried over to the new reforestation by environmental or mallee plantings method.

It would be a big step backward to loose the Alternative Assurance arrangements.

Q12

Unsure

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.

While there are no immediate changes that we would like to see, we have not been through a reporting cycle for an Alternative Assurance project and would be better placed to comment after that.

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Q14

Respondent skipped this question

Do you have any additional comments or feedback?
