

ACCU Method Development Team
Department of Climate Change, Energy, the Environment and Water
Canberra ACT 2601
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Dear ACCU Method Development Team,

RE: Draft Environmental Plantings method 2024

Following on from our earlier Stage 1 feedback¹, the Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on the *Draft Reforestation by Environmental or Mallee Plantings method 2024*.

The Australian Land Conservation Alliance (ALCA) is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

The Environmental Plantings method is a key carbon market method for delivering benefits for Australian biodiversity and is thus utilised by a range of ALCA member organisations.

Please note that ALCA is happy for this feedback to be published in full.

Recommendations

Recommendation 1: That the definition for project tree (section 5) be amended as follows to account for an apparent ‘typo’:

“*project tree* means a tree or shrub that has been established within a carbon estimation **area** through undertaking a reforestation project”

Recommendation 2: That the Government consider the potential unintended consequences of requiring the FullCAM version to be the most recent version published on the Department’s website (section 5, definition for *FullCAM* and *FullCAM Guidelines*) and consider the possibility of allowing the FullCAM version to be fixed to the version as at time of registration, or to use the most recent FullCAM version as at the end of each reporting period.

Recommendation 3: That there be no requirement to split permanent plantings for mixed-species and mallee into separately registered projects (section 9), as both planting types can be accommodated side-by-side through stratification and calibration of carbon estimation areas. ALCA also notes that it is possible to have project areas which could meet both mixed-species and mallee planting requirements, and hence the need for the distinction is unclear.

¹ See: <https://alca.org.au/alca-submission-on-the-environmental-plantings-carbon-market-method-stage-1-feedback/>

Recommendation 4: That the Government investigate whether there should be consistency between section 14(3) and *Combined CEAs in regeneration and environmental planting projects guidance* (October 2023)², including by updating the guidance.

Recommendation 5: That the Government consider revising the description of ‘initial fertiliser application’ (section 60(2)(1)) for further clarity, as the first application of fertiliser can occur after 12 months has passed, and multiple applications of fertiliser can be made within the first 12 months. For example (potential amendments in **bold**):

*“Subsection (1) does not apply in relation to **any first, single any** application of fertiliser ~~within the first 12 months of~~ after planting (an initial fertiliser application).*

As a related issue, it would also be helpful for there to be clarity on whether this provision is intended to be applicable to infill plantings or not.

Recommendation 6: Regarding the 10% limit for collection of fruits, nuts, seeds and leaves (section 57(d)), it is unclear to ALCA how this figure was selected (albeit the consistency with fallen timber collection is noted); ALCA recommends that the Government consider either more flexibility – or a higher threshold, such as 20% – especially where it relates to native seeds, noting that native seed stocks can often be a significant constraining factor in delivering environmental plantings at scale. For example (suggested amendments in **bold**):

“57 Permitted biomass removals

Biomass may be harvested:

...

*(d) to remove fruits, nuts, seeds, or material used for fencing or as craft materials (other than woody products), provided no more than 10% of any fruits, nuts, seeds or leaves present on a tree or shrub are harvested in a calendar year (whether for personal or commercial use), **excepting for a tree or shrub where a different proportion has otherwise been determined by the Regulator; or**”*

Recommendation 7: That the Government clarify that infill plantings are not intended to reset the FullCAM model, and that non-infill plantings are intended to reset the FullCAM model.

Thank you again for the opportunity to provide a submission on the *Draft Reforestation by Environmental or Mallee Plantings method 2024*.

Australian Land Conservation Alliance

² <https://cer.gov.au/document/combined-ceas-regeneration-and-environmental-planting-projects-guidance>

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our seventeen members are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nature Foundation
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 3 million square kilometres with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$325 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.