

National
Farmers
Federation

Draft Reforestation by Environmental or Mallee Plantings Method 2024

July 2024



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



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15 July 2024

ACCU Method Development Team
Department of Climate Change, Energy, the Environment, and Water
King Edward Terrace
Parkes ACT 2600

Via email: ACCUMethods@dcceew.gov.au

RE: Draft Reforestation by Environmental Mallee Plantings Method 2024

Dear Sir / Madam,

Overview

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to this consultation. The *Draft Reforestation by Environmental or Mallee Plantings Method Determination 2024* is intended to replace the existing 2014 methodology set to expire by end of September 2024.

NFF Position

The NFF commends efforts to improve the accessibility of this methodology to small landholders and farming families. The proposed revised requirements build upon the success of the 2014 methodology and represents a significant improvement as it will broaden the scope for participation in the ACCU Scheme. This is apparent as changes to the purchase timing of fertiliser and seed stock in preparation of land ahead of project registration will enable landholders additional time to prepare a project and anticipate commodity prices ahead of input purchases.

FullCAM

Vegetation methodologies under the ACCU Scheme such as this proposed revised methodology utilise FullCAM to estimate abatement. FullCAM is a free resource and is regularly updated by Government to ensure estimations are accurately reflecting on-ground abatement at the project scale. The ACCU Review found that the current model-based estimation of carbon sequestration using FullCAM is a suitable basis for estimating aggregate carbon storage in native vegetation when applied appropriately at the project level. There is benefit however for sequestration projects to opt for direct measurement of carbon storage with appropriate evidence and assurance rather than relying on modelled estimates. This should be progressed as a matter of priority to ensure there is a balance of choice for proponents.

The proposed 2024 methodology does not provide the standard grandfathering arrangements for FullCAM models. This establishes a precedent that may impact investment certainty as projects will be required to switch to the version of FullCAM currently in-force without any transitional arrangements provided to facilitate this.

Requirements for a Carbon Estimation Area

A Carbon Estimation Area (CEA) must consist of land on which permanent plantings are established. A CEA must be mapped in accordance with CFI Mapping Guidelines and comprise one or more parts that are at least 0.2 hectares each and have uniform site characteristics in relation to soil type, aspect, and slope. The requirement for a CEO to be established and managed under the same land management regime which consists of activities including the following is flawed:

- *Preparation activities prior to planting;*
- *Planting;*
- *Thinning;*
- *Weed control; and*
- *The application of fertiliser.*

NFF seek to remove the weed control provision as this presents a direct impediment to gaining rapid tree growth and by extension, attaining real measurable carbon abatement.

Conclusion

The NFF thanks the Department for the opportunity to provide a submission. Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Yours sincerely,



CHARLES THOMAS

Acting Chief Executive Officer



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Leading
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