



Australian Government

Carbon Farming Initiative Methodology

Overview

This submission template should be used to provide comments on a draft methodology proposed under the Carbon Farming Initiative.

Contact Details

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Date:	26 July 2011



Greenfleet Response to Draft Methodology For Environmental Plantings

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Do you want this submission to be treated as confidential? Yes No

Submission Instructions

Submissions should be made by **close of business** on the day the public consultation period closes for the methodology. This date will be specified on the website. The Department reserves the right not to consider late submissions.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – DOIC@climatechange.gov.au.

Submissions may alternatively be sent to the postal address below to arrive by the due date.

DOIC Secretariat, Land Division
Department of Climate Change and Energy Efficiency
GPO Box 854
CANBERRA ACT 2601



Name of methodology: Draft methodology for environmental plantings

General/overall comments

Greenfleet welcomes the development of standard methodologies for Environmental Plantings and the enhancements to the tools to support A/R projects. Both are excellent tools for promoting environmental plantings for carbon sinks in Australia. We recognise and applaud work currently underway to improve the granularity of the FullCam tools. As it stands, we believe that the tools do not provide sufficient recognition and reward to well managed biodiverse plantings, and as such will necessarily require the development and independent review of detailed in field testing methodologies.

We look forward to reading the developed methodologies in the context of regulations when they are released. We make the following general comments:

- **Environmental Plantings**

Consideration should be given to changing the name of the methodology from ‘environmental plantings’ to ‘biodiverse’ or ‘mixed species landscape plantings’ or similar or a term that aligns with the biodiverse goals of the CFI and is reflective of terms more commonly used by the industry.

The term ‘environmental plantings’ fails to capture the economic and agricultural benefits provided by biodiverse plantings using indigenous species including as stock shelter belts, Integrated Pest Management and to increase soil nitrogen levels and to mitigate against dryland salinity and the erosion of top soil.

There are several examples of where the provision of shelter belts of native trees aids in sheep weight gain and reduces lamb mortality rates. Inclusion of *Acacia sp.* and *Allocasuarina sp.* increases soil nitrogen levels and pasture growth rates. A complex, biodiverse forest significantly increases avian numbers and diversity on-farm that reduces insect pest pressure on crops and pastures and lowers farming costs.

The economic benefits of biodiverse forests are at least equal to the environmental ones and the use of language that better reflects this will likely lead to an increase in the adoption and acceptance of biodiverse forestry as part of agricultural systems.

Greenfleet also makes comment on the following points in more detail in the body of the response.

- **5.1 Specific Abatement Activities – Koala Fodder or Oil Collection.**

Ensuring arrangements for pruning trees for fodder or oil collection can be taken into account (as not specifically addressed in the methodology although removing debris for firewood is). We appreciate that an exhaustive list is not practical but general guidance would be useful.

- **6.1 Baseline - Natural Conservation where no regrowth has occurred.**

Ensuring arrangements do not require a 5 year delay on removal of pest species in areas of natural conservation.



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- **6.2 Existing Carbon Sinks**
Since 1997, Greenfleet’s forests have all been planted for the purpose of providing carbon offsets. We can provide clear information that supports the case. We believe that all these projects that meet the definition of a forest should be eligible for accreditation under the methodology.
- **7.1 Baseline - Removing Pest Species**
The regulations need to ensure that perverse environmental outcomes do not occur due to the restrictions of the methodology, particularly in the removal of large pest species that meet the definition of a tree.
- The methodology states that removing pre-existing non-forest vegetation is excluded on the assumption that the biomass will be approximately equal or less the forest understorey. This is true where the pest species is a shrub or bush, however does not apply where pest species are large invasive tree species such as willows. Old willows contain tonnes of carbon however, should be removed from riparian areas for water quality and biodiversity improvements. However, it appears that t

The regulations need to ensure that perverse environmental outcomes do not occur due to the restrictions of the methodology.
- **Section 8 – Project Area**
Ensuring that minor infill plantings to improve canopy cover does not impact the CEA as areas need to be ‘established at the same time’.

Section number	Comments
5.1	<ul style="list-style-type: none"> • Specific Abatement Activities – Koala Fodder or Oil Collection. Greenfleet has arrangements with several sanctuaries for pruning of lower branches for koala fodder is permitted on some of its forest projects. We see these arrangements as additional benefits to the contribution to habitat of these plantings. Furthermore, Greenfleet has been in discussion with indigenous groups regarding the collection of ‘bush tucker’ or foliage for oil production from the plantings. Again, we see these activities though commercial in nature (we don’t derive income) as creating additional benefits for the communities. We are keen to ensure arrangements for pruning trees for fodder or oil collection can be taken into account (as not specifically addressed in the methodology although removing debris for firewood is). We appreciate that an exhaustive list is not practical but general guidance on permitted limits would be useful.



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Section number	Comments
5.2	<ul style="list-style-type: none"> It is difficult to understand in what circumstances ‘environmental plantings’ may be detrimental to biodiversity. Guidance on this point is appreciated.
5.3	<ul style="list-style-type: none"> The Reforestation Modelling Tool is a welcome improvement to the utility and ease of use of the FullCAM.
5.3	<ul style="list-style-type: none"> FullCAM FullCAM’s underlying calculations and modelling is used to generate Australia’s National Greenhouse Accounts. It is unclear how useful FullCAM is at modelling forest growth and carbon sequestration at a small project or fine scale level and whether it should be used for this purpose. Applying FullCAM at a fine scale where a range of field condition parameters -- such as soil depth, soil fertility, surface water availability, wood density of specific species -- vary both within and between project sites fails to elicit any change in FullCAM modelling results. Unless FullCAM can produce differentiated modelling results at a fine scale or at a project level, its use in the CFI may result in a lack of confidence in the modelling results by project proponents and stymie investment in carbon forestry projects. It is Greenfleet’s view that FullCAM is best suited to landscape wide or creating carbon accounts at the national level and that an in-field measurement methodology be developed for use by project proponents at the property level. We recognise however, that an in- field approach may not be economically feasible for smaller projects.
6.1	<ul style="list-style-type: none"> Natural Conservation where no regrowth has occurred. Greenfleet has planted forest on conservation areas which have not regrown on their own over extended periods of time and accept the guidance described. However, there are some conservation areas which are covered in pest species such as box thorn where it is unknown whether the forests would re-establish on removal of the pest species. In these areas, Greenfleet replants immediately before ensuring natural regrowth would occur on its own. The notes appear to require that the areas would need to lie fallow for 5 years before a baseline could be set. Perhaps this is merely our reading of the document however, clarity on this point is requested.



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Section number	Comments
6.2	<ul style="list-style-type: none"> Greenfleet believes forests established before 1 July 2010 for the sole purpose of sequestering carbon should have the total carbon stocks included in the CFI provided all other Kyoto Protocol forestry rules are met. Failure to recognise previous Australian Government land based abatement standards risks eroding confidence in the CFI and the risk projects and investment won't be recognised by future governments.
7.2	<ul style="list-style-type: none"> Baseline - Removing Pest Species The regulations need to ensure that perverse environmental outcomes do not occur due to the restrictions of the methodology, particularly for the removal of large pest species that meet the definition of a tree. The methodology states that removing pre-existing non-forest vegetation is excluded on the assumption that the biomass will be approximately be equal or less than the forest understory effectively cancelling each other out. This is true where the pest species is a shrub or bush, however does not apply where pest species are large invasive tree species such as willows. Old willows contain tonnes of carbon however, should be removed from riparian areas for water quality and biodiversity improvements. However, it appears that the rules would require the replanted area to meet the existing carbon stocks (ie contained in the pest species) before any credit could be issued. We agree with the general principle regarding the need to return to pre-existing carbon stocks however feel that the rule is prejudicial to much needed investment in riparian restoration. The regulations need to ensure that perverse environmental outcomes do not occur due to the restrictions of the methodology (or ways of overcoming this problem are provided).
9.2	<ul style="list-style-type: none"> Emission Sources The fuel use section should reflect the fuel arrangements under the carbon tax and the exclusion of fuel use from motor vehicles and light trucks from the carbon tax. Table 8 on page 26 and text relating to record keeping on page 28 may also need updating to reflect the treatment of fuel under the carbon tax arrangements. In particular, fuel used by heavy transport in transporting stock to sites or air travel in visiting sites may need to be addressed.