



Senator David Pocock, Senator for the ACT  
PO Box 6100  
Parliament House  
Canberra ACT 2600

By email: [senator.david.pocock@aph.gov.au](mailto:senator.david.pocock@aph.gov.au)

Thursday 8 September 2022

**Re: Potential disallowance of the plantation forestry method**

Dear Senator Pocock,

We understand that you have expressed concerns about the integrity of the 2022 Plantation Forestry method, particularly in respect to Schedules 3 and 4. I write today to introduce our professional body, Forestry Australia; and to offer our assistance in matters related to forest science and management.

Forestry Australia is a professional association with over 1,000 members. Our members are forest scientists, professionals, managers and growers operating in all aspects of forest and natural resource management throughout Australia. We advocate for and provide professional development to ensure balanced, integrated forested land use, as well as sustainable management that meets community and environmental needs. Furthermore, Forestry Australia's Carbon Working Group was actively involved in the co-design of the 2022 Plantation Forestry method throughout 2021.

As a starting point, we consider plantation forests play a key role in mitigating climate change - and expansion of our national plantation estate, encompassing farm forestry, represents a significant opportunity for Australia to reduce its greenhouse gas emissions profile. Plantation forests are grown to provide wood products for society - products that are natural, recyclable and renewable (the 'ultimate renewable'), making them an excellent substitute for more carbon-intensive materials in an increasingly waste-conscious society<sup>1</sup>. When these plantations are harvested, they are replanted and a new rotation grows, which ensures the sustainable cycle of forestry - and carbon sequestration - continues over time.

You may be aware that a key environmental integrity control in the 2022 Plantation Forestry method is the requirement for a Registered Forestry Professional (RFP) to sign off on the Forest Management Plan under all Schedules in the method. RFPs with demonstrated experience in financial assessments or financial reporting are also eligible to assist project proponents by preparing or reviewing the financial assessment required for schedules 3 and 4.

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<sup>1</sup> Department of Agriculture and Water Resources 2018, *Growing a better Australia – A billion trees for jobs and growth*, Canberra. CC BY 4.0. ISBN 978-1-76003-174-9 (printed).



Among other roles, Forestry Australia is responsible for the administration of the RFP scheme, which is a professional accreditation scheme for people working in forestry. The scheme provides an assurance that the skills, knowledge and ethics of an RFP meet a high standard and can be trusted and relied upon. Among other requirements, RFPs are required to adhere to the Forestry Australia Code of Conduct<sup>2</sup> and complete at least 30 hours of continuing professional development per year. The scheme is independently audited. We are confident that the role of RFPs in the 2022 Plantation Forestry method will enhance the integrity of projects registered under it.

We share your commitment to ensuring integrity in the carbon farming market and consider that concerns need to be considered in an open and transparent manner. For this reason, Forestry Australia is supportive of your concerns being formally reviewed as part of the Independent Review of Australian Carbon Credit Units being led by Professor Ian Chubb.

As an additional safeguard, we suggest that the Clean Energy Regulator announce as part of its 'Compliance and Enforcement' priorities<sup>3</sup>, particular scrutiny should be applied to projects that are registered under Schedules 3 and 4 to ensure these schedules are functioning as intended.

In addition, we suggest that the Plantation Forestry method could be flagged for review by the Emissions Reduction Assurance Committee (ERAC) earlier than the normal method review schedule, for example, within two years. This would allow time for the method to be tested, and to understand if there are any issues with its implementation.

Forestry Australia is not supportive of a direct disallowance of the method, for two reasons:

- 1) Firstly, because there is a formal process currently underway in the form of the Chubb review, which has a remit to specifically interrogate any concerns with the carbon farming framework, and
- 2) Secondly, there has been insufficient time to evaluate the method, with no schedule 3 or 4 projects currently registered for crediting<sup>4</sup>.

As such, there is insufficient data to assess the integrity of projects registered under Schedules 3 and 4 of the 2022 Plantation Forestry method.

Moreover, disallowance of the Plantation Forestry method in its entirety will stymie investment and undermine the confidence required to grow the plantation estate at a time when there are critical timber shortages, and when the sector is ready and able to play a significant role in delivering on the nation's

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<sup>2</sup> Forestry Australia's Code of Conduct: <https://www.forestry.org.au/code-of-conduct/>

<sup>3</sup> Clean Energy Regulator guidance: <https://www.cleanenergyregulator.gov.au/About/Compliance-and-Enforcement/compliance-priorities>

<sup>4</sup> We note that at the time of writing, there are seven projects registered under the 2022 Plantation Forestry method. According to the ERF project register, it appears that all of these are new plantings (i.e. not Schedule 3 or 4 projects): <https://www.cleanenergyregulator.gov.au/ERF/project-and-contracts-registers/project-register>



climate change targets.

Our President, Bob Gordon and I will be attending the AFPA Gala Dinner next week and we would welcome the opportunity to discuss the information outlined in this letter in further detail.

If you would like to discuss this letter further, please do not hesitate to contact me on 0418 111 626.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "J. Martin".

Jacquie Martin  
CEO, Forestry Australia

**CC:**

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manage, study and care for our forests*