



Please direct all responses/queries to:

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Department of Climate Change, Energy, the Environment and Water  
Attn: ACCU Method Development Team

Woodside Energy Ltd

ACN 005 482 986

Mia Yellagonga

11 Mount Street

Perth WA 6000

Australia

T: +61 8 9348 4000

[www.woodside.com](http://www.woodside.com)

Dear ACCU Method Development Team,

## **FEEDBACK ON EXPOSURE DRAFT REFORESTATION BY ENVIRONMENTAL OR MALLEE PLANTINGS METHOD 2024**

Woodside Energy (**Woodside**) welcomes the opportunity to provide feedback on the exposure draft of the *Carbon Credits (Carbon Farming Initiative) Reforestation by Environmental or Mallee Plantings – FullCAM) Methodology Determination 2024 (2024 Method)*.

We acknowledge that the 2024 Method is intended to address administrative and technical issues and improve the practical operation of the current *Carbon Credits (Carbon Farming Initiative) Reforestation by Environmental or Mallee Plantings – FullCAM) Methodology Determination 2014 (2014 Method)*.

Having considered the exposure draft and associated materials, Woodside has identified further recommendations that have the potential to improve the clarity of, and ease of participation in the 2024 Method. These recommendations are set out in greater detail in Attachment A (**Feedback on 2024 Method**), but in summary, they are:

- implementing a two-year grace period before project proponents are required to update to an updated tool such as the Full Carbon Accounting Method (**FulICAM**);
- allowing for the clearing of woody biomass prior to project registration, with amendments to ensure carbon is accounted for;
- focusing the newness requirement on crediting abatement that occurs after registration;
- clarifying the requirements when modelling fertiliser events in FullCAM;
- providing sufficient definition to enable removal of biomass in accordance with traditional Indigenous practices; and
- removing, or expanding, the radius requirements for Carbon Estimation Areas.

In 2018, Woodside established a business unit to develop an offsets portfolio in support of our climate targets and aspirations. The Woodside Native Reforestation Project commenced in 2020 and aims to create biodiverse tree plantings in Australia. To date, Woodside has planted over 10,000 hectares of native trees and shrubs using the 2014 Method. Reforestation of the relevant land has not only allowed for increased habitat connectivity through restored landscape linkages, but has also provided employment opportunities for communities.

Woodside looks forward to continued engagement on the 2024 Method and on the Australian Carbon Credit Unit Scheme generally.

Yours sincerely

Vice President Carbon Solutions

Attached: Feedback on 2024 Method

**Attachment A – Feedback on 2024 Method**

Item	Relevant Document(s) and Provision(s)	Context and Feedback	Recommendation
<b>Adoption of updated tools such as FullCAM</b>	Draft Simple Method Guide: Section 4.1.1 FullCAM modelling	<p>We support the adoption of robust, updated modeling tools, as recommended by the Climate Change Authority (CCA) in its <a href="#">2023 ACCU Scheme Report</a>.</p> <p>The CCA's recommendation noted that there is a balance to be struck between the ability to confidently invest in carbon projects and the inherent and perceived integrity of a method and the Australian Carbon Credit Unit (ACCU) Scheme. This balance should, however, be shifted towards integrity with respect to requiring project proponents to use the latest version of method tools.</p>	<p>Woodside agrees with CCA's stance that an adjustment of the balance between providing proponent certainty and ACCU Scheme integrity is required. We support implementing the CCA's recommendation to introduce a two-year grace period before project proponents are required to adopt an updated tool such as FullCAM.</p> <p>However, this grace period should not preclude voluntary adoption. Furthermore, publication of a guidance note on the frequency and likely impacts (including boundaries) of future tool updates could provide a greater degree of certainty to market participants and, consequently, may lead to an optimal outcome for ACCU Scheme reform.</p>
<b>Woody biomass removal prior to project registration</b>	Draft Simple Method Guide: Section 1.3:	<p>Many areas of land within project boundaries contain woody biomass that is not native forest, however, under the current and proposed Method, removal and replanting is heavily restricted.</p> <p>We understand the concern regarding the removal of carbon stock prior to planting, however, current practice can involve removal of this woody biomass and, thereafter, waiting the appropriate amount of time (for e.g. five or seven years) before planting.</p> <p>During this waiting period, heavy management of weed load is required (for e.g. herbicide spray, mechanical removal, burning, etc.) to ensure weed coverage remains low and does not negatively impact surrounding Carbon Estimation Areas and neighbouring properties.</p> <p>Allowing for the removal of non-native woody biomass and planting a native species mix is aligned with the intent of the Method as it will result in more sequestered carbon overall and significantly reduce the negative impact of heavy land management practices while waiting the allotted time to plant, all of which may result in more rapid land regeneration and biodiversity benefits.</p>	<p>Woodside acknowledges the need for the Method to account for carbon that is contained within the biomass of woody weeds and non-native vegetation.</p> <p>We recommend allowing the clearing of woody weeds and non-native vegetation when a conservative discount is applied to the abatement associated with planting that area. This could then allow for compensation in relation to the carbon loss associated with the removal of the woody weeds or non-native vegetation. This discount could be applied before, during, or after calculation of abatement within FullCAM.</p>
<b>Ground Preparation</b>	2024 Method: Section 62 Requirements in lieu of newness requirement	<p>We appreciate the additions to the 2024 Method that allow for ground preparation to occur prior to project registration, and for the purchase of seed or seedlings prior to an application to register. We understand the distinction between allowing for the purchase of seed/seedlings prior to an application, and allowing ground preparation after an application, is due to newness, as ground</p>	<p>It is recommended that activities leading up to planting, including ground preparation, should not be excluded on the grounds of newness.</p> <p>The distinction made in the 2024 Method between ground preparation and plant preparation on the grounds of newness</p>

		<p>preparation is perceived to be a stronger commitment to a project.</p> <p>However, we are of the view that ground preparation does not represent a stronger commitment to initiate a project than the purchase of seed, seedlings or properties. The cost of ground preparation is relatively small when compared to the overall costs. Furthermore, all three activities have the potential to cease prior to planting if the project registration is unsuccessful. Therefore, it is our view that newness is more clearly drawn when planting occurs, as this activity firmly initiates a project.</p>	<p>does not appear to align with the recommendations made in both the Chubb Review and the 2023 CCA Review of the ACCU Scheme. The recommendation in both reviews was that that newness should be refocused on crediting abatement that occurs after registration. Both reviews also made a distinction between new abatement and new activity. It should also be noted that ground preparation for planting will likely not result in abatement and, it is submitted that, the commencement of abatement under an environmental planting method project should be considered to begin at planting.</p>
<b>Modelling fertiliser events in FullCAM</b>	<p>2024 Method: Section 5 Definitions Section 60 Use of lime or fertiliser Simple Method Guide: Section 3.3.4 Use of fertiliser</p> <p>Draft FullCAM Guidelines: Section 2.5.2 Adding a New Event</p>	<p>The documents contain four separate sections that provide conflicting advice regarding the modelling of fertiliser, namely:</p> <ol style="list-style-type: none"> <li>1. Section 60 of the 2024 Method states that a starter fertiliser event (initial fertiliser) cannot be used within the first 12 months;</li> <li>2. Section 3.3.4 of the Draft Simple Method Guide states that the project proponent must not model fertiliser events in FullCAM;</li> <li>3. Section 2.4.2 of Draft FullCAM Guidelines states that both fertiliser and weed events may not be modelled in FullCAM; and</li> <li>4. Section 5 of the 2024 Method states that fertiliser and weed events can be modelled in FullCAM.</li> </ol>	<p>Consistent guidance is recommended regarding the implementation of fertiliser and weed events within FullCAM.</p>
<b>Removal of biomass in accordance with traditional Indigenous practices</b>	<p>2024 Method: Section 57 Permitted biomass removals</p>	<p>Section 57(f) of the 2024 Method states that biomass may be harvested in accordance with traditional Indigenous practices.</p> <p>It is understood that this overrules the '10% rule' for permitted biomass removal. However, it is unclear how "traditional Indigenous practices" are defined.</p>	<p>It is recommended that a definition for 'traditional Indigenous practices' be provided and/or guidance be provided on how a project proponent must evidence these practices.</p>
<b>CEA Stratification</b>	<p>2024 Method: Section 14 Requirements for a carbon estimation area</p>	<p>Typically, in mixed-species environmental planting, large areas of land composed of identical uniformity requirements (soil type, species mix, slope/aspect) are planted. Therefore, when a Carbon Estimation Area (<b>CEA</b>) is composed of multiple polygons, multiple CEAs must be created due to the 1.5km radius rule.</p> <p>The recently released "Combined CEAs in Regeneration and Environmental Planting Projects Guidance" states that, when a CEA is composed of more than one part, the centroid location should represent the average above ground biomass value for that CEA.</p>	<p>It is recommended that the '1.5km radius rule' be removed or increased.</p> <p>In light of recent guidance regarding centroid placement, the relative size of a CEA is not a significant factor when calculating carbon yield when uniformity requirements are met.</p>