

Emissions Reduction Division  
Department of Climate Change, Energy, the Environment and Water  
Canberra ACT 2601 Australia  
Via email: [ACCUMethods@dcceew.gov.au](mailto:ACCUMethods@dcceew.gov.au)

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ABN 80 637 680 310

19 April 2024

Dear Emissions Reduction Division,

### **RE: Environmental Plantings 2014 method, Stage 1 feedback**

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide feedback on constructive changes to the Environmental Plantings 2014 method.

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**

The scale and accelerating consequences of the nature crisis facing Australia and the world has been well-documented, having been set out by ALCA and Australia's private land conservation sector, Australia's 2021 State of Environment Report, the UK Government's Dasgupta Review<sup>1</sup>, various World Economic Forum reports<sup>2</sup>, and by many others across the national and international community more broadly. **Together, we know that the nature crisis is an existential threat for humanity, and it is gathering pace.**

ALCA's submission, therefore, does not seek to reproduce in full the detailed technical recommendations being made by its member organisations, or by other key stakeholders in Australia's carbon market.

Instead, ALCA's recommendations focus on the changes sought to the Environmental Plantings method that are the top priorities to enable the private land conservation sector to deliver durable and expanded benefits for Australian nature, alongside climate emissions reduction.

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<sup>1</sup> <https://www.gov.uk/government/publications/final-report-the-economics-of-biodiversity-the-dasgupta-review>

<sup>2</sup> For example: <https://www.weforum.org/publications/nature-risk-rising-why-the-crisis-engulfing-nature-matters-for-business-and-the-economy/>; and <https://www.weforum.org/publications/global-risks-report-2024/>

**Recommendation 1:** That certain preparatory work be allowed to commence prior to formal notification of registration, noting that this requirement is poorly aligned with the required lead times – and planting windows – for environmental plantings. The allowed preparatory work should include, at minimum:

- purchase of seed and/or tubestock;
- weed control; and
- soil ripping and other pre-planting soil preparation.

**Recommendation 2:** Where appropriate, allow blended approaches to seeding (i.e. direct seeding *and* tubestock).

**Recommendation 3:** Allow projects to apply for grant funding prior to a project's declaration.

**Recommendation 4:** Clarify that 'known weed species' may include local weeds where appropriate evidence and/or authority is provided.

**Recommendation 5:** Allow the sustainable collection of fruits, nuts, and seeds from plantings, subject to jurisdictional requirements for collection. ALCA understands that collection of fruits, nuts and seeds do not materially impact net carbon stocks, and further notes that the supply of various native seeds can often be greatly constrained.

**Recommendation 6:** Ensure that there are no disincentives or unnecessary complexity for supplementary plantings where their purpose is to augment outcomes for biodiversity.

Thank you again for the opportunity to provide feedback on potential revisions to the Environmental Plantings method.

**Australian Land Conservation Alliance**

## 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.