

## Q&A – Open information session for proposed Avoided Clearing method

*Questions from webinar held 9 December 2025*

### EPBC

**Q:** How do the new EPBC provisions for tree clearing interact with the proposed Method?

**A:** The change to the EPBC Act's 'continuing use exemption' should not affect the design of the method. 'Unrestricted right to clear' remains a relevant term for the method. The continuing use exemption that was changed under the EPBC reforms was relatively narrow in scope, however there remains some uncertainty as to how the EPBC Act will be administered in the future, which may impact on some potential projects under the method. DCCEEW have suggested any queries can be sent to [environment.protection@dcceew.gov.au](mailto:environment.protection@dcceew.gov.au) / 1800 920 528.

### Crediting and permanence

**Q:** The crediting and permanence periods appear to still require CFI Act changes - has this been considered or confirmed with DCCEEW?

**A:** The CFI Act allows for crediting periods to be set within a method. However, the Emissions Reduction Assurance Committee will need to be satisfied of the approach we are taking to on-going additionality over the 50-year period. For permanence periods, we are simply stating a 'minimum 50-year period' for avoided clearing projects, which would allow for 50-year permanence projects if the CFI Act is amended in the future, for instance, to align with the Nature Repair Act.

**Q:** Can we have a 50-year permanence and 50 crediting period for the AC part in forest and sub forest? Would remove long term risk for landholders

**A:** No. Under the proposed method, projects can only have a 50-year crediting period if they have a 100-year permanence period.

## Gateways, aggregates and modelling

**Q:** Has an assessment been made to determine that the gateway checks can be met in the relevant times for the environments the method can be applied? I.e. crown cover development assessment by IBRA class?

**A:** The forest development and forest attainment gateway thresholds for native reforestation and avoided sub-forest avoided re-clearing CEAs have been informed by data on the modelled rate of biomass accumulation in natural regeneration on cleared lands in areas that receive 400-600mm average annual rainfall in Queensland and New South Wales (using FullCAM) and the corresponding expected levels of crown cover. We believe this approach provides a reasonable basis for minimum expected changes in crown cover across most systems. Notably, where the gateways are not satisfied, it does not result in the exclusion of the land – the land needs to be re-stratified into a new CEA and crediting is paused until the gateway requirements are satisfied. Land is only excluded if it does not meet the applicable gateway requirement within the specified 'grace' period.

**Q:** How do the aggregates relate to abatement modelling? Unclear how CEAs can overlap if they are the basis for calculating abatement as you would be modelling overlapping abatement if CEAs are not distinct areas? Likewise this is a problem if the aggregate includes non-CEA cells.

**A:** Modelling of sequestration is not done using overlapping assessment cells. The assessment cells are used to evaluate compliance with the eligibility requirements and for assessing compliance with the gateway requirements. Sequestration is modelled using the land areas included in the CEAs only and no overlap of CEAs or duplication of modelled lands is allowed.

**Q:** If you can have non CEA in the aggregates aren't you potentially counting pre-existing forest in CEA gateways?

**A:** No. Land adjacent to the CEA that contains pre-existing woody vegetation can be included in a 0.2 ha aggregation for the purposes of assessing forest potential and forest attainment. However, where this occurs, the land inside the CEA in the 0.2 ha also needs to satisfy the relevant forest development and forest attainment requirements (ignoring the requirement for the land to be 0.2 ha to constitute a forest).

**Q:** Are cells 'fixed' to landmarks or to geographic coordinates? My concern here is that images are not always rectified geographically precisely enough for the cells to be exactly fixed to the landscape, and if the cells are geographically fixed, successive images might move behind the grid. How will that be addressed?

**A:** The 10m x 10m grid that is used to stratify the project is fixed using geographic coordinates. The method will provide a degree of tolerance to accommodate inaccuracies in relevant remote sensed data.

## Thinning

Q: I assume there are no restrictions on potential commercial use (e.g. timber, firewood) of any trees removed as part of ecological thinning?

A: Thinning is permitted once only within the permanence period for any area of land. You won't be able to remove biomass from the project land through ecological thinning.

## Planting density requirement

Q: Is 400 stems a hectare for planting quite high? My understanding is that the current EP required density is 250 stems/ha. What science supports the long term sustainability of 400 stems per ha, I see a lot of trees not surviving?

A: There is a degree of legal uncertainty about the minimum planting density allowed under the EP method. The CFI mapping guidelines suggest the minimum is 400 stems/ha. Noting this, in practice, reasonable planting densities for reforestation in Australia generally involve 400-500 stems/ha, often significantly higher. In mature woodland ecosystems, the number of trees per hectare can be significantly below 400 stems/ha. To reflect this, the method does not set requirements for the number of trees that persist per hectare in a CEA. It merely requires that the CEAs (and relevant CEA parts) achieve forest cover. In mature forest and woodlands, forest cover can generally be achieved with <400 stems/ha.

## Alternative Assurance

Q: Is this method considered for alternative assurance? (or will be?)

A: Alternative Assurance arrangements are a decision for the Board of the Clean Energy Regulator.

## Biosecurity requirements

Q: Could you elaborate on what sort of biosecurity requirements there will be? I assume to ensure some weed-free CEAs, is that correct?

A: Landholders need to demonstrate how they will manage biosecurity risks on the site to limit risk to the environment, human health and interests of surrounding landholder, to satisfy applicable laws and to align with local or regional biosecurity plans (as appropriate to each jurisdiction).

## Case studies

Q: Do you still plan to do case studies?

A: Yes, case studies will be welcomed as part of this engagement process. DETSI will meet with those who have offered to undertake case studies shortly, however, the provision of feedback on the practicalities of implementing and reporting on a project under the method will be welcome from any stakeholder.

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