

Transcript of 'ACCU method update – New 2026 savanna fire management methods' webinar delivered on 10 April 2026 by Carbon Crediting Branch, Emissions Reduction Division, DCCEEW

Okay, great. I think we're going to get started.

So I'd just like to begin by acknowledging the Traditional Owners throughout Australia and pay my respects to elders, past and present. I personally am dialing in from the Blue Mountains beautiful area, and I would like to acknowledge the Dharug and Gundungurra peoples whose land I'm joining in from today. And I'd like to extend my acknowledgment to all First Nations people calling in today, because we're sure there's quite a few of you.

What we do and achieve as a nation when it comes to savanna fire management is a strong part down to yourselves and the shared traditional knowledge and experience of fire and fire burning. Okay, we're just going to start off with a little bit of housekeeping. We are recording the session today. So let us know if you've got any concerns there.

We are aiming to make a version of the slides recording available next week. We are going to go through a rather lengthy presentation, although we are hoping not to use up 2.5 hours. There will be a Q&A session at the end. And questions can be submitted via the chat function. Now we are going to get the questions reviewed by our moderators.

You know, primarily just to make sure that there's, there's nothing, problematic from a harassment perspective happening. But we think we know you. We think it'll all be great, and we look forward to actually engaging with you in that Q&A point at time. Just a note that questions on eligibility of specific projects. So, for instance, you know, if you, project projects in general, are not where we are going to be most helpful.

We would direct you to the Clean Energy Regulator in general. We will follow up via email, on any questions that we can't address today as well. So if there's anything, especially any specific, questions, that you have about your particular savanna projects, we will, you know, try and make sure that either ourselves or the Clean Energy Regulator, follows up with you.

Okay. So I'm sure many of you have already guessed, but today, we really want to welcome you and announce that the Assistant Minister for Climate Change and Energy has made two new savanna fire management methods. Those methods are the Carbon Credits (Carbon Farming Initiative – Savanna Sequestration and Emissions Avoidance) Methodology Determination 2026 a wonderful mouthful.

And of course, the accompanying emissions avoidance only methodology determination 2026. At the same time, there's also been an Amendment Rule to the CFI Rule that has been made, and that's to support the operation of the methods. The new methods and the Amendment Rule were made on 1st April 2026, registered on the Federal Register of Legislation today and commence tomorrow.

So when they commence tomorrow on the 11th of April, that will effectively revoke as well the 2018 savanna methods. Projects who are currently operating under those methods can continue to operate. This impacts only new projects registering under those 2018 methods.

The Assistant Minister has already released a media update, and the department will shortly send out an email to its stakeholder list with some additional information. Now, due to some IT issues because when do they ever not happen? Our website updates are slightly behind and you may find that these are only updated in a staggered manner throughout the day, and at times there may be a web page offline.

Please bear with us if you can. If you're still having trouble finding things on Monday, feel free to shoot us an email. Okay, I want to take a quick moment to actually do a few acknowledgments, because we would not be here today without the contribution, effort and dedication of a huge number of people from different fields. So first and most importantly, our First Nations fire management and project proponents.

They had a vision for what this method could be. Share their knowledge and experiences with enormous generosity, and patiently explain to us all the challenges they faced implementing projects under the earlier methods. Also to ICIN, who generally provided advice along the way and facilitated much of our consultation with First Nations stakeholders.

Thanks also to the research teams from Charles Darwin University who build a body of scientific research over 20 years, together with indigenous researchers and communities that provided the evidence for the method.

Also, our thanks to, in particular Keryn Paul and Stephen Roxburgh, who built on the work done by CDU and transformed it into a national accounting framework for fire and carbon dynamics and published it in the International Journal of Wildland Fire. Then, of course, to our colleagues, in our inventory branch who performed the critical task of getting the new carbon pools approved under the United Nations Framework Convention on Climate Change.

Not an easy feat. Then, thanks to the team at Veris (formerly Spatial Vision) who took on mission impossible and built the SavCAM software necessary for the method. The user

interface may look deceptively simple, but we would be remiss if we did not acknowledge that there were genuine concerns about whether this method was technologically feasible. Then, to CSIRO more generally, who took on the second mission impossible by conducting the independent technical review and validating the model.

In essence, this required them to build a second independent version of SavCAM. Then to our DCCEEW legal team, who patiently worked through the progress of drafting the methods, sending it to us for review, then amending in line with feedback. It took 18 rounds to get the emissions avoidance method right and 22 rounds for the sequestration method.

Finally, to our wonderful Emissions Reduction Assurance Committee, who took the time to thoroughly assess the final methods to ensure that they meet the Offsets Integrity Standards and prepared their advice to the Assistant Minister accordingly.

Also a shout out to Work Science who conducted a work health and safety hazard assessment for us. Then to Ricardo, who assessed whether the methods meet the requirements as per the CFI Act and have logical and arithmetical rigor.

Then, of course, to the Clean Energy Regulator, who provided ongoing input into whether the proposals could be effectively administered from their side, and then to every single person who gave feedback during consultation, including everyone who took time to participate in a workshop, meeting, webinar or provide a written response to the exposure drafts. And finally, to my own lovely DCCEEW methods team who were involved every step along the way.

And I know it's challenging sometimes from the outside to see what goes on, but I can tell you that there was a lot of late nights and early mornings and, you know, a lot of effort to make sure that the methods are actually being delivered today and are being delivered with high integrity. And consider all of the various, concerns, and points that stakeholders have raised with us.

In summary, these methods are the culmination of many years of hard work by a large number of people, and we appreciate everyone who contributed to the process. Okay, let's get on with it. So what we're going to do, partly why I spent so long on acknowledgment, is celebrate the fact that we finally made the methods. I'm sure everyone is happy that we've gotten there.

We will then spend quite a bit of time explaining the key methods settings, including noting where changes have been made from the exposure draft versions, and then there'll be some time for questions. Now, I just wanted to note that after our Q&A

session, we will come back briefly and speak to some ACCU market considerations. So for any stakeholders that we have online that are perhaps from, market analysis areas, I'd suggest just coming back for that.

Whilst we don't necessarily run, you know, do our own market analysis, in, in the way that you do, we certainly, you know, make sure that we consider these kind of, you know, elements. And we want to make sure that we're giving you the most information that we can, for your own purposes.

Okay. I'm going to very quickly recap savanna fire management methods, primarily for those of you who are online who might be a little new to our methods, because we think there's a few of you online. Now, Australia's savanna landscape stretch across the far north and make up around a quarter of the country's land area, making them some of our most extensive and ecologically important landscapes.

These areas are broadly divided into lower and higher rainfall zones, and both follow a clear early and late dry season pattern that strongly influence how fire behaves. Savanna fire management, the ACCU activity is built around this seasonality, with projects focusing on planned early dry season burning. Burning earlier in the year creates cooler patches of fires that reduce the risk of large, intense late season wildfires.

This approach lowers greenhouse gas emissions and delivers wide benefits, including healthier ecosystems, improved landscape resilience, and greater carbon stored in vegetation organic matter. Savanna fire management is already operating at a scale at scale under the Scheme, with close to 90 projects covering almost 35 million hectares. That's a couple of Tasmanias and I believe around 4.5% of entire Australia.

First Nations leadership is central to the program, with around 70% of the total project area managed by First Nations groups and most ACCUs generated through indigenous owned carbon businesses. Beyond emissions reductions, therefore, these projects support jobs and Country, generate income, strengthen caring for Country, and deliver social, cultural and economic benefits to communities. Okay, let's get into the new methods.

I'm going to run through, initially an overview of the key features of both new methods. This is going to be an overview snapshot and then we'll delve into depth for some of those features later in the webinar presentation. I note that some of the features I carried over from the 2018 savanna methods and earlier methods. Some of these features were proposed in the exposure draft methods and were well received and consequently remain unchanged.

And then for other items, we listened to what you had to say and have adjusted the method based on your feedback. So let's start with some of our project eligibility and core activity requirements. So both new 2026 savanna methods continue to require ongoing strategic fire management through planned burns in the early dry season to reduce the risk of high intensity, late dry season fires.

This core project activity is unchanged from the 2018 savanna methods. Both methods now explicitly recognise Pindan vegetation as an eligible fuel type, enabling abatement to be credited in Acacia dominated landscapes in the southwest Kimberley. This is a new feature we introduced and consulted on and retained following consultation. Both methods allow limited capacity building fire management to occur before project commencement, supporting skills development, confident participation and informed consent, particularly for First Nations communities.

This is a new 2026 feature proposed in the exposure draft and retain unchanged.

Existing savanna projects remain eligible to transfer to the new 2026 methods, maintaining continuity with early arrangements. This feature is largely unchanged, although related crediting period settings were refined following consultation. Projects under both methods can continue to operate in either high or low rainfall savanna zones, consistent with earlier methods. With new flexibility built in to adjust rainfall zones in the future.

As evidence evolves. We've clarified that and amended that post consultation, and we'll talk a little bit more about it later on.

Let's go to baselines and crediting periods. For new projects, abatement is measured against the 20 year baseline of historical fire activity, so that improves baseline accuracy and reduces sensitivity to short term variability. This is a new feature of these new methods. We consulted on it and retained it. For projects transferring from earlier savanna methods, existing baseline periods so time lengths are retained that ensures continuity for long running projects.

That approach has also not changed from what we have done in earlier methods. New projects under both methods continue to receive the proposed 25 year crediting period. That's also unchanged from the 2018 savanna methods.

Where transferring projects regain eligible interest holder consents, both new methods now also allow access to a new crediting period for existing projects of up to 25 years. This is a key change introduced after consultation to better align income with long term fire management and permanence obligations. Where eligible interest holder consents are not regained, transferring projects can continue onto the remainder of the existing

crediting period if they're doing the same activity. Preserving flexibility while maintaining consent integrity.

Now we'll get back. We will get into, how exactly that all works a little bit later on. Let's talk to the carbon modelling features. Abatement under both methods is calculated using the new Savanna Carbon Accounting model, or SavCAM, which draws on Australia's national Full Carbon Accounting Model. This represents a major new feature compared to the 2018 methods, and that feature is retained through consultation and after consultation. Through the use of SavCAM,

abatement calculations are now fully aligned with the Australian National Greenhouse Accounts. Ensuring scientific parameters assumptions are consistent with national inventory reports. This alignment is new. The methods additionally model carbon stored in living biomass, dead standing trees and fallen debris to determine sequestration. They also consider emissions from these forms of biomass when calculating avoided emissions. Consideration of these carbon pools represents a significant expansion beyond the 2018 methods.

In what we can account for and what we can therefore, credit. Transferring projects, so projects that transfer to these new methods, particularly projects that transfer to the new sequestration methods, will be able to receive credits for carbon already accumulated in the landscape as a result of long term fire management. This is a new feature. It's refined. It's been refined,

in response to the consultation to address some of the concerns people have have had, but it is in large maintained. To manage reversal risk and permanence however, the sequestration method will introduce a sequestration bank that controls when sequestration ACCUs are issued, rather than issuing them all upfront. This new feature was added directly following consultation. This will be of great interest to many of you, and I can guarantee we have multiple slides that delve into it a little later in the presentation.

Now, sequestration ACCUs continue to be subject to the conservative buffers and discounts. 25% for 25 year permanence projects and 5% for 100 year permanence projects. These settings are the same in previous versions of the methods. Both methods also apply a 5% uncertainty discount to avoidance ACCUs to account for modelling uncertainty. Again, consistent with earlier savanna methods. Under the sequestration method, if a project records negative abatement in a year, the loss can be carried for it forward and made good in future years rather than triggering immediate relinquishment.

This happens via the carryover mechanism, which is also a feature of the 2018 methods, and was retained as part of these methods. Okay, let's move on to some of the environmental and health safeguards. Both methods now require proponents to consider potential PM 2.5 impacts. These are smoke impacts from planned burning in or near populated areas, responding directly to consultation feedback on smoke impacts, and possible health impacts from them.

This safeguard is new in the final method and will explore what it means a little later on. Annual monitoring for relevant weed species is required across both methods. Using a risk based approach aligned with project management plans. This requirement builds on earlier methods and was consulted on and has been clarified slightly following consultation. We'll go through what exactly the clarifications are.

Where weeds are detected, both methods require practical, science based annual treatment with flexibility where circumstances are beyond the proponents' control. For sequestration projects, it's important to clarify weed management obligations extend through the entire permanence period, reflecting risk to stored carbon. We are clarifying that measure as there was some confusion on this during consultation. Okay. Let's go to spatial accuracy and method adaptability.

Both methods strengthened notification requirements where areas become ineligible, including due to land clearing, ensuring corrections to vegetation fuel type maps and abatement calculations are made promptly. These are enhanced integrity provisions that have been added following consultation. The methods now explicitly also allow rainfall zones to be updated or extended in the future without remaking the determination, although they would still be consultation required, providing adaptability as new evidence emerges.

This flexibility is new in the 2026 methods and responds to stakeholder feedback during consultation. SavCAM can continue to be updated over time, including with revised FullCAM parameters, and those updates will be applied prospectively. This approach not to grandfather tool is new compared to older methods and was retained after consultation. We'll explain exactly what that means for particular abatement calculations.

A little later as well. Where projects are subdivided, vegetation fuel type map accuracy must be reviewed and revalidated within two years if necessary, strengthening spatial accuracy. This requirement was also clarified and strengthened strengthened post consultation. Finally, transparency and administration. The Clean Energy Regulator may now also or is now required to also publish vegetation fuel type map files. This will be subject to some narrow exemptions.

We are anticipating this will improve transparency and public confidence. This is a new power enabled through a CFI Rule Amendment and responds to consultation feedback. Where vegetation fuel type maps are exempt from publication, the CER would instead publish maps, a map showing just the ineligible areas, ensuring transparency is still maintained. So we will again explore exactly what that means and why we've done it a little bit later.

Okay, so that's the overview done. We're going to now dive into the various bits and pieces. Okay. We'll start with capacity building fire management. Again nothing has changed since consultation. But I'll also explain it for those of you who might not have been part of those webinars. The new savanna methods allow for capacity building fire management, which is fire management that can occur before a project formally commences.

This recognises that proponents may need time to build the skills, knowledge, and operational capacity to run a savanna fire management project without this affecting project eligibility under the ACCU Scheme. Generally, ACCU methods do not allow project activities to start before the project begins, because crediting relies on demonstrating that the activity is occurring because of the Scheme and is therefore additional. For savanna fire management,

however, stakeholders have told us that teaching fire management skills upfront is often essential before a project can operate effectively at all. In this context, it is appropriate to allow capacity building activities to occur in advance, provided we can still clearly measure the baseline and understand the real impact in the ACCU Scheme. Earlier savanna methods did not include this kind of preparatory phase.

Many land managers often had to begin crediting without sufficient training, sometimes resulting in poorer fire outcomes in the early years and reduced emissions and crediting outcomes. The new methods allow for a gap of up to six years between the end of the baseline period and the start of crediting, during which training, governance preparation and strategic early dry season burning can take place.

The six year timeframe reflects consultation feedback, and is, and is intended to span multiple fire cycles as well as accommodate the time often required to secure consents, including free, prior and informed consent processes. This period gives rangers time to train and qualify, support informed participation by landholders and helps ensure projects are well established before crediting begins. For example, the project registers in 2027 and can show capacity building

fire management has been underway since 2023, the baseline could be set for 2003 to 2022, with crediting commencing from 2028 through to 2052. Proponents must

document capacity building activities in their project management plans and provide evidence such as fire permits, burn records. These requirements are designed to prevent capacity building arrangements from being used to manipulate baseline settings. Given baselines are calculated using 20 years of data, the methods maintain strong integrity even while allowing limited fire management before crediting begins.

Okay, so this is a new feature as well. While under the sequestration method, land cannot be registered again, if a previous savanna project was on that land and was revoked and by revoked we mean, more than one day, and ACCUs have already been issued. This is permissible, under the emissions avoidance only method. I will note just very quickly, if you're confused about this projects revoked more than one day element.

This is just because short administrative revocations can actually occur during project transfers. And some and you know they would then be lasting a day. And we don't want to have the same circumstances apply in relation to not allowing them to reregister. So that's why this is about projects that have been revoked for more than one day. Now, for the sequestration method and not allowing this kind of restart that approach is consistent with earlier savanna methods and prevents the same area from generating sequestration outcomes more than once.

The emissions avoidance only method, however, does now allow allow for previously revoked projects to reregister. However, land may not be reregistered until at least ten years have passed between the revocation and declaration under the new method, and this is because this helps manage double counting risk while allowing land to re-enter the Scheme, where circumstances have genuinely changed.

And we know that's perhaps the case in some areas in the north east. The ten year gap provides strong dissent, a strong disincentive for gaming, and is more conservative than other ACCU Scheme project eligibility requirements.

Applicants must still provide a statement as part of the application. They have not deliberately, deliberately increased the baseline emissions or decreased baseline carbon stock or breached, of course, any bushfire legislation during the baseline period. They do wish to re-enter the Scheme.

Okay. Now in relation to general eligibility elements for transferring projects, existing projects that transfer to the new method must have consecutive reporting years, with no gap between the final reporting year under the old method and the first reporting year under the new method. Any known infestations of relevant weed species must be treated within the 12 months before transfer, and treatment has to continue annually after the project transfers.

Project applications must clearly identify which areas are transferring, include existing project identifiers and provide all required supporting documentation. Additional requirements apply when a project switches between project types, i.e. emissions avoidance to sequestration and vice versa, rather than transferring within the same type of savanna method. When an emissions avoidance only project transfers to the sequestration and emissions avoidance method, the sequestration baseline uses the same time period as the original project, and, however, new eligible interest holder consents are required because the project takes on a permanence obligation. And that must be consented to. When a sequestration project transfers to the emissions avoidance only method, the project must first be revoked, or varied, especially if only part of the area is transferring. When a sequestration project moves to the emissions avoidance only method, the relevant sequestration ACCUs have to be relinquished, because, of course, those credits and that sequestration is no longer tied to a permanent obligation under the new method.

Time to talk all about baselines. For all new savanna projects, as mentioned just before, we've extended that baseline period to 20 years regardless of rainfall zone.

Under earlier savanna methods, baselines were shorter, so: ten years in the high rainfall zones, and fifty years in low rainfall zones, reflecting typical fire return intervals at the time. But now we can actually use a longer baseline because we have reliable satellite fire history data available back to 1988, allowing us to better capture natural variability in fire patterns and carbon stocks.

A longer baseline, of course, provides a more representative picture of fire activity before a project starts, which strengthens the accuracy and credibility of abatement calculations. For participants, this means submitting fire history data over a longer period, but it results in a more robust and defensible baseline. Extending the baseline to 20 years reflects best practice, and effectively doubles the amount of historical data used to compare to earlier methods.

This change was well received during consultation, with no significant concerns raised, and has therefore been retained in the final methods. To maintain continuity for existing participants, projects that transfer from older savanna methods keep their original baseline period length, rather than apply the new 20-year baseline retrospectively.

Projects that transfer to the new Savanna methods are eligible now for an extended crediting period of up to 25 years, from the year the new methods commence. In considering whether transferring projects should receive a crediting period extension, the key question was whether savanna fire management would realistically continue without ACCU income over the period, the next 25-year period. Strong evidence shows

that savanna fire management projects face significant ongoing costs, including for staff, aircraft, fuel, equipment and specialist expertise.

On that basis, the department concluded it's unlikely these projects would continue without ACCU revenue and that this situation is expected to remain over the next 25 years. As a result, transferring projects continue to meet additionality requirements that of the ACCU Scheme and continued crediting is appropriate. And that view was endorsed by the Emissions Reduction Assurance Committee. Extending the crediting period also helps lock in sequestration that has already accumulated under existing projects if they are under the sequestration method. For a project that commenced 15 years ago, continued funding for fire management through to around 2050 supports retention of that stored carbon for around 40 years in practice, even where projects formally commit to a 25-year permanence period. The length of the crediting period is tied to the date this instrument commenced, and the number of full calendar years that have passed since then.

This means project[s] that register early, can access the full additional 25 years. While projects that register later receive one fewer year of additional crediting for each year, the methods have already been in effect.

Requiring new eligible interest holder consents reflect the fact that the original activity is now being extended by an additional 10 to 15 years, which is a material change and of course, that warrants renewed consents and approval. Projects that take longer to transfer will have fewer years of extension to their crediting. This design discourages delay, but it also ensures that we don't have a situation where someone waits out their project on the older methods as long as possible, and then transfers to the new method, and then receives 25 additional years at that point in time.

That, from our perspective, doesn't, isn't exactly what was approved, because what we've looked at - when we're thinking about whether emissions remain, reductions are made additional, and the project remains additional over the next 25 years - is we've looked at that next 25 year period. Right? So we want to make sure, or let's put it this way, the ERAC, has approved that the additionality of these project remains over these next 25 years. After that, there'll have to be a new consideration.

Okay. Let's go to some of our carbon modelling features.

Both new savanna methods use a new abatement calculation tool called SavCAM to calculate emissions avoidance and sequestration outcomes. During early engagement on the methods, we heard clearly that users wanted a tool that felt familiar. So from a practical point of view, SavCAM has been designed to look and feel very similar to the old SavBAT tools.

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While the user experience is similar, SavCAM is different under the hood because it uses the FullCAM model to run the carbon simulations, using updated science and data. Now that the method settings are settled, SavCAM itself will be finalised over the coming months, incorporating feedback we've received during consultation. We will continue to publish information on our website so users can see what has changed in SavCAM and

why. For example, changes to how run-in fire history is created, which may affect starting baseline emissions and carbon stocks for some projects. During consultation, some stakeholders also asked for even more transparency about how SavCAM has been built and how the calculations work. In response, we will be releasing a technical document that explains the design and structure of SavCAM in more detail along the methods.

So, it explains a little bit more about how the code works. So just keep an eye out in relation to SavCAM, on the website, where we'll have the updates of what's been changed and why. We'll also make sure to start a new round of user testing once those final features have been integrated, just to make sure that there's no hiccups in terms of actually using the model.

Now, a little bit about what version of SavCAM needs to be used. Under the new methods, proponents are required to always use the most recently published version of SavCAM, which of course might have been updated to incorporate new data from FullCAM. There's no grandfathering of older versions, because these projects run for at least 25 years, and older software quickly becomes obsolete, insecure, and difficult to support.

This requirement is especially important for emissions avoidance calculations. For emissions avoidance, abatement will be calculated by comparing the current year's emissions to baseline emissions every single year. To make sure we are comparing apples with apples, SavCAM re-runs the baseline, every single year, using the same version of SavCAM that is used to calculate the current year's emissions.

So, every single year, the baseline is recalculated based on the most recent version of SavCAM. And that is important because, over time, SavCAM might have the ability to look at, and consider, more forms of, or more emissions from, different vegetation matter that it couldn't previously account for. And of course, if we were suddenly to compare current emissions to baseline emissions under a, say, SavCAM model that didn't even consider those vegetation types, then we're really comparing two very different things.

Now it's slightly different for sequestration calculations. When we calculate year-to-year sequestration gains, what we tend to do, is we compare the current carbon stock levels with [the] previous year's carbon stock levels. And what we will do, for these kind of calculations, is those previous year's carbon stocks will be using the previous year's reported numbers. SavCAM will not be recalculating those carbon stock figures unless, for some reason, those reported numbers aren't available.

And that means, essentially, the last year's numbers stay as they were reported at the time, even if they were produced using an earlier version of SavCAM. And so basically there is some element of an earlier version of SavCAM being used. The current year's sequestration, however, will always be calculated using the latest visual SavCAM. So that approach avoids retrospectively changing previously reported sequestration outcomes while still ensuring new calculations reflect the best available science.

And in simple terms, what that means, is sequestration builds forward from what was actually reported, and we continue to be accurate and in-sync with our National Inventory.

Now, existing savanna methods already include conservative discounts to manage known risks. And we propose to retain those settings in the new methods. We apply a sequestration buffer discount to projects, especially those committing to shorter permanence periods, because storing carbon in landscapes is not risk free, particularly over longer periods, and some future losses cannot be ruled out even with good management.

In carbon accounting, sequestration is often only considered equivalent to a permanent emissions reduction if the carbon is maintained for a very long time, which is why permanent obligations are a central feature of the ACCU Scheme. Savanna fire management projects operate in highly fire-prone environments, so even well-run projects face real risks of carbon being lost through severe fires, drought or other disturbances.

The sequestration buffer recognises this reality upfront by crediting slightly less than the modelled sequestration so the Scheme is protected if losses occur in future. Projects that choose a shorter 25-year permanence period face greater uncertainty about what happens to the carbon after obligations end, so a larger buffer applies in those cases. Projects that commit to a 100-year permanence period provide much greater confidence in the long-term storage

so a small buffer is appropriate. This buffer only applies to carbon that is stored in the landscape, not to the calculation of avoided emissions. Because of course, when it comes to avoided emissions, emissions that never occur cannot later be reversed.

However, for avoided emissions, we apply an uncertainty discount of 5%, and this too was an established feature of the earlier savanna methods.

Emissions avoidance is calculated, as I've said, by comparing each year's fire emissions to a long-term baseline average. And that means outcomes naturally vary from year to year. Some years will perform better than average, and some worse. And the uncertainty discount exists to manage the risk that a project could finish with higher-than-expected emissions in its final years.

Rather than relying on credit clawbacks after the fact, the Scheme takes a conservative approach by holding back a small proportion of credits over time. If a project has a poor year, it must make up that shortfall before earning new credits, with the uncertainty buffer helping manage that risk in a practical way. The uncertainty discount, and these buffers, have been part of savanna methods for many years, and have proven effective in ensuring emissions avoidance outcomes remain conservative over the life of a project.

Taken together, these discounts reflect a long-standing approach in savanna methods of managing risk conservatively, rather than assuming perfect outcomes. They were proposed for retention in the exposure drafts of the new methods, and remain in this final design. However, having considered consultation feedback, in particular around the amount of carbon sequestration that is likely to come across and be recognised for the first time from existing projects.

And having considered the latest CSIRO analysis on how quickly carbon can be lost. We did have to consider whether these discounts were sufficient to manage all the risks associated with crediting large amounts of sequestration.

A central proposal in the exposure draft was to allow projects to credit carbon that had accumulated since the commencement of savanna fire management activities, not just carbon accumulated after the new methods begin. For some existing projects that choose to transfer, this could involve recognising sequestration that built up many years earlier, potentially well before these new methods have commenced.

This accumulated carbon, however, was a direct result of ACCU-supported savanna fire management activities, delivered under earlier savanna methods and sustained operational effort. Under those earlier methods, this stored carbon is not subject to a permanence obligation. That means while it's built up, this stored carbon is not something we can lock in unless those existing projects moved to these new methods and commit to permanence obligations.

The proposal, therefore, for the first time, brings that already stored carbon under an explicit permanence framework that creates integrity benefits, justifies why this is additional, but it also means there are some risk consideration[s]. Because of its scale and implications, the proposal to credit accumulator sequestration was new, significant, and attracted more feedback than any other aspect of the consultation.

During consultation, some stakeholders raised concerns about additionality, including claims that credited accumulated carbon amounted to backdating or recognising outcomes that would have happened anyway. The department did not agree with these particular concerns. That's based on scientific evidence, and a clear causal relationship between the sustained fire management [and] increased carbon stocks. And the fact that there is a lot of evidence demonstrating that, just because carbon has accumulated, it does not persist without ongoing active fire management and would likely be lost if these projects don't move to the new methods. On that basis, the department, and of course then also the ERAC, was satisfied that accumulated sequestration represented real additional outcomes, and that recognising it was important for environmental integrity,

equity, and supporting ongoing land stewardship. At the same time, the new savanna methods enable much larger volumes of sequestration to be recognised than other earlier methods, fundamentally changing the consequences if any of that carbon is later lost. Existing safeguards, like the sequestration buffer [and] uncertainty discounts manage average long-term risk, but they do not adequately address the risks created by issuing large volumes of credits early before durability is established

over the longer term. Savanna landscapes are inherently high-risk systems, with fire as a dominant ecological force and climate change increasing the likelihood of extreme high intensity fire events. This, the latest CSIRO modelling that we did late last year, showed that reversal risks in savannas is particularly acute, with a single severe fire capable of removing stored carbon very quickly, and potentially within a year, rather than eroding gradually over decades.

This does create a real risk that credits could be issued for carbon that is highly exposed to near term loss, even where long term averages appear acceptable. When sequestration volumes are small, reversals can be absorbed within Scheme-wide buffers. But at the scale of savanna sequestration, reversals become a material Scheme integrity risk. Large reversals, after upfront crediting, would undermine confidence in the durability of ACCUs and the very high[ly] recognised integrity of savanna ACCUs.

Stakeholders and regulators highlighted that reputational and market confidence risk cannot be managed by discounts alone, particularly if losses occur soon after credit

issuance. Scientific evidence also shows that short term increases in carbon stocks do not always represent durable abatement, as they can reflect favourable climatic conditions rather than sustained management effort. Crediting large amounts of accumulated sequestration immediately would therefore over reward early outcome before permanence

obligations have been demonstrated in practice over the longer term. Taken together, this made it clear the department needed to do more than rely on existing controls alone to appropriately manage risks at this scale. At the same time, simply applying much heavier discounts was not considered appropriate, as it would fail to recognise genuine achievements already being delivered through long running ACCU activities.

The core challenge was to strengthen integrity and confidence, while still recognising real sequestration outcomes and maintaining incentives for long term stewardship.

Having recognised both the opportunity to credit accumulated sequestration and heightened risks involved, the department needed a way to strengthen confidence that credited carbon would actually last. The sequestration bank was designed, first and foremost, as an integrity safeguard, not as a pricing or market management tool. At a high level, the sequestration bank is about only issuing credits when there is a greater confidence that the carbon will be durable and maintained in the landscape. Rather than treating all measured sequestration as immediately equivalent, it recognises that confidence increases over time and carbon stays in place throughout seasons, years and fire events.

Importantly, the sequestration bank does not reduce the total amount of abatement a project can earn over its life. Instead, it changes when credits are issued, particularly in the early years when reversal risk is highest, and confidence and permanence lowest. This approach directly responds to the scientific evidence and consultation feedback about early large-scale crediting being the point of greatest Scheme risk.

It allows the Scheme to recognise real sequestration outcomes while avoiding the integrity and confidence risks that come from issuing too much, too early. A secondary effect of this approach is that credits are spread more evenly over time, which can of course, help with market stability. But that's not the primary driver. The primary driver is confidence in durability and permanence at both the project level and across the ACCU Scheme as a whole.

We want savanna ACCUs to continue to be recognised as having extremely high integrity. The new few slides, the next few slides, step through how the sequestration bank works in practice, including how carbon is held, released over time, and treated if losses occur. Okay, now, because the banking calculations are slightly challenging, we

have presented both this incredibly overwhelming visual depiction of how it works as well as some flow charts and graphs in future slides.

We're hoping at least one of the ways we try to explain it to you will land. If not, please keep an eye out on our email from today, which we will have a sequestration bank explainer fact sheet attached to it. I will now explain this wonderful piggy chart slide based on a typical new savanna sequestration project that is measuring carbon stocks every year as part of its reporting. Bear with me in understanding this slide, it will make more sense soon.

For each year, the project measures how much carbon is stored in vegetation compared to, either, its baseline or the previous year using the standard accounting model.

Under the sequestration bank approach, not all of that measured increase is credited straight away. In each reporting year, a portion of the newly measured sequestration is credited immediately, and the remaining portion is placed into the sequestration bank. The bank is simply a record of sequestration that has been measured, but not yet credited. It is not a holdings register where ACCUs are kept.

The carbon held in the bank is then released gradually over the remaining years of the project's crediting period. The amount released from the bank each year is known as the 'annual release amount' and it is a proportional amount that is based on how many crediting years are left as the project moves forward, or if the banked carbon becomes eligible to be credited.

In general, if the project has a good year with additional sequestration, half is recognised straight away and half goes into the bank. In this picture, the half that is recognised is demonstrated by the green circle with trees in it on the left top of the screen, in the middle of left of the screen, you can see an orange piggy bank, and that depicts the half that goes into the bank.

This is half of the carbon stock gains for that year. You can see that over years the contribution to this bank, so this solid orange piggy bank, will decrease. However, the actual size of the bank, which is the dotted orange piggy bank here, will increase initially and then only decrease in later years. It's increasing because it's getting more added to it.

But of course, it also continues to release amounts and so, in later years, it's going to decrease. The amount of crediting in a year, that actually eventuates, is pictured in the top half of the screen. So everything in green. It includes the portion that is half the sequestration achieved that year, the big green circle with trees in it, and the portion that is released from the bank (the smaller green circle with a piggy bank in it).

You can see that in the early years, the credits that you receive are more likely due to what you achieve in the particular year - this is for new projects though remember - whereas in the latter years the credits are more likely to be because of what is being released from the bank.

I note that while this picture doesn't go into the mechanics of it, the sequestration buffer discounts still apply. If the project, so one of the, I suppose, nifty things, we think, about the sequestration bank is that it also helps manage variability. If a project has a difficult year - for example, due to an intense fire - and carbon stocks fall,

the banking mechanism can help manage that loss. When a loss occurs, it is handled in two parts: half of the loss reduces the balance sitting in the sequestration bin bank, - meaning less uncredited sequestration is available to be released in future years - the other half is deducted from the amount that would otherwise have been released and credited that year.

If the annual release amount is large enough to cover any loss, any reversal, the project still actually receives credits, just fewer than expected. If the loss is larger than the release amount, no credits are issued for that year, and the remaining shortfall is carried forward and must be made good through future sequestration. Importantly, previously issued ACCUs are not clawed back just because a bad year occurs,

the bank acts as a buffer that helps absorb this normal year-to-year variability, while still ensuring losses are fully accounted for over time. Over the life of the project, all qualifying sequestration can still be credited provided the carbon is maintained. What the bank changes in practice is the timing and the profile of crediting, particularly in early, high risk years of the project.

The net effect for a project is a steadier, more predictable flow of credits with clear rules for how gains and losses are treated in each year. From a practical perspective, proponents will keep managing fire reporting annually, and the banking mechanism is applied transparently through the abatement calculation. I want to just quickly, I suppose, elaborate on that point. One of the key ways in which we manage risks, and we manage to achieve and continue having stored sequestration by the time we get to 2050, is to make sure that we are constantly supporting the fire management to continue, even in those years that are bad.

This, to some extent, does help with that in those bad years. If the years don't completely reverse sequestration, you know, there's a good chance that there will still be funding available in that year to help proponents continue to manage fire. It's in those bad years that we want to be supporting the fire management to continue so that any reversals are built up

again. Okay, let's go to a flow chart, which some of you will find much easier to follow. Okay, so this is an example for a new project in its first year. We're going to just assume it has a 25-year permanence period, so a 25% final discount. Now we've just used rounded numbers, don't think of, you know, too much into these.

But in this particular instance, there's been a hundred tons of carbon dioxide equivalent increase in carbon stocks in that first year. What happens? 50 tons goes into the sequestration bank. 50 tons is immediately acknowledged for crediting purposes.

In that same year, there's already a release from that sequestration bank. That release is directly proportional to the amount of crediting, years that remain. So this particular new project has a 25 years of crediting, and the release amount is therefore a 25th of the amount in the bank for the amount of the bank is 50. So that release amount is two tons.

In this particular instance, that two tons is added to the 50 tons that were already being acknowledged for crediting purposes. That brings us to 52 tons in total. For crediting purposes, we do apply the sequestration buffer discount in this case because of the 25 year permanence. It's 25%. Brings us to 39 tons of carbon dioxide equivalent, that are recognised for crediting that project receives 39 ACCUs, and it now has for the next year already in the bank, 48 tons of carbon dioxide equivalent.

In the second year. This calculation flow would be very similar, although there's more in the bank to start with to which the 50 tons, let's say if they already. If they gain another hundred tons that year, to which the 50 tons get added, then of course that also increases the release amount. The second, year, so we've made a note here that the first year for transferring projects of existing projects is slightly different.

We'll go into that. But second, the second year's and all remaining years for transferring projects also follow this particular calculation flow.

Okay, a few more examples, and this time with graphs. For those of you who love graphs. So this is an example that's no reversals. It's a new project. Sequestration is increasing in line with the typical growth curve. So that's, you know, usually most rapidly in the first few years. And then it peters off. So there's a bit of a logarithmic curve there.

You can see that by this dark green line. So that's showing the actual gains in sequestration. Crediting because of how the bank works is still highest in the first few years. That can help projects establish good procedures. But you'll see that, over time, it then becomes very much smoothed and sustained and flat. We'll go to the next slide.

So in terms of, this particular example, this is where we've got minor reversals. What you'll see is here, the project experienced a minor reversal of sequestration in its 10th year. But you can also see and this is the blue line that whilst it gets less credits, it still gets some credits. And that's due to the fact that it's still getting something from the bank.

However, if we go towards a significant reversal, there will still be times a few years, where, the project will not get ACCUs. And the carryover mechanism, which is also, retained from the 2018 method, will apply. So that basically means there will be some years where the project will not have to pay back ACCUs. But, they're not able to earn new sequestration ACCUs for those few years.

The sequestration bank will still act every single year to mitigate the amount, that needs to be, paid back. And so really what happens is, in this case, while it takes the project seven years to regain all of the lost sequestration because it had some it, it had a lot in the bank, initially it does start earning ACCUs again after just four years.

It's really important to note that, this is all the these calculations are all just for the sequestration component of projects, projects that are under the sequestration emissions avoidance method. They will have every single year additional funding that comes through from the emissions avoidance component. If they're managing to reduce emissions.

Okay. There's a slight difference between transferring projects in the first year. And again, this is due to the scale, of, the accumulated carbon that, you know, might, come across with these projects and, and the risks associated with any reversal of that kind of at that kind of scale. So for transferring projects in their first year alone, it's not the case that 50% of the carbon stocks that they have managed to maintain since their baseline period gets provided to them, for crediting purposes that year.

In fact, the whole amount of carbon gains immediately going into the sequestration bank. However, they then immediately get a 25th of that. If they've got 25 years of crediting, they've got 23 years of credit, you'll be a 23rd of that. And so basically in this particular example, a 25th of a thousand, is 40, so 40 tons in that first year is acknowledged for crediting.

It gets discounted by the construction buffer and 30 ACCUs get issued 960 tons remain in the bank for future years. Any half of any increase between that year and the next year will go be acknowledged for crediting periods, purposes, sorry, crediting purposes straight away. And the project will get, crediting that is in line with both 50% of that as well as in that case, 24th of what is remaining in the bank.

So in essence, if we look at how this plays out, in the first few years, that is a little bit of a, additional crediting, for these transferring projects that's primarily in like the second to fourth or so year. We expect for a typical, project that's perhaps been operating for a bit longer. But there's still be significant amount of ACCUs in the first year and then a fairly smooth, amount of ACCUs over the next 25 years.

Okay. Hopefully one of those methods of explaining the sequestration bank has been useful. Of course, feel free to ask them all questions in relation to them as we get through to our question and answer session. But let's start with some other minutes. Which is what I'm going to do is I'm going to hand for now to my colleague, Kelly Hsu, who's going to talk a little bit to weed monitoring.

Thanks, Verena. Yes. I'm going to be talking a little bit about weeds now. So it's important to think about weeds because, they can change the emission profile. Savanna burning projects. So for the new methods, Gamba grass is still the only, identified, relevant weed species listed in the Savanna technical guidance document currently.

And that reflects its role as a weed that alters the fire behavior because it burns, it makes fire burn more intense, and increases the emissions and reduces the carbon sequestration. But with that in mind, we think that it's also important that, we management needs to be practical to implement. And so there has been some changes in the requirements since the 2018 methods, with regards to weed.

So the new methods and new 2026 methods strengthen the weed monitoring and management requirements while, giving proponents greater flexibility when to in terms of managing the risks associated with weeds. So starting with monitoring first proponents for the new methods, must prepare a project plan that sets out how weeds will be monitored and managed and, that needs to be appropriate to the level of, weed risk to the project area.

And, during the monitoring, for any new weeds. And that's detected, in a project area for the first time, proponents have 60 days to let the CER know, and this has to be done in writing, and include details such as the date and the location, in geospatial format in which the weed species was detected.

And in terms of management, weeds. that's known in a project area, so for projects that wants to transfer or register under the new methods for these known weed affected areas, proponents, have 12 months prior to the project transferring or registering under new methods to treat that weed, or other. And provide evidence for doing so, or otherwise they'll be excluded from a project.

Now, if, after starting the project under the new methods, a relevant weed is detected, proponents will have 18 months to treat that weed. All of the above ground biomass, using herbicide or mechanical removal, with fire not being permitted as a, as a treatment method. And this treatment annual treatment has to continue until the weed, is eradicated, and is defined as not being detected for 24 months. Now, relevant weed species must be mapped and reported.

However, during the public consultation, we heard, acknowledge how weed operations can be very large and complex operations. Due to the remoteness and just the vast, areas that Savanna projects cover. So in that context, we acknowledge that, there may be circumstances that are beyond the proponents control, from year to year, like, for example, that can be very extreme weather, or very severe fire.

That sort of prevents, having all the right people in the right place at the right time. And it's genuinely beyond the proponents control. So the new methods, excuses, these, circumstances from sort of carrying out the, the weed monitoring and management provided that evidence can be provided to sort of justify why it wasn't carried out for that year.

But in general, treatment is just not feasible for, for the weed identified, the affected area must be removed. And in that case, if, if the project is a sequestration project, all those sequestration and gains in that removed area, will be subtracted from future, ACCUs issued.

Thanks Verena, if you want to carry on now.

Beautiful. Thank you. Kelly. Okay. Like to say it's great that we're getting lots of questions through. And, we will of course deal with those in our Q&A portion. Now, the other thing that's come up as part of consultation, where we've acted is, impacts on air quality from smoke, from fires. It was something that was raised.

And we haven't introduced new air quality considerations in the Savanna methods directly in response to some of that feedback. In particular, submissions highlighted that fine particulate pollution known as PM 2.5. I think it's a term we all know post Covid can disproportionately affect indigenous communities and people with chronic health conditions. Stakeholders also pointed to emerging evidence that PM 2.5 levels during the early dry season have been worsening in some areas, especially around Darwin.

Following that feedback, the department look more closely at air quality data on broader trends to understand whether these concerns were well-founded. Northern Territory air quality reporting does show that Darwin often exceeds National daily stands for PM 2.5, largely due to landscape fires. prevailing wind patterns during the early dry

season. We also consider the broader national policy context, including lessons from the, black Summer bushfires and recommendations from the Royal Commission into the Natural National Natural Disaster Arrangements.

We are convinced that smoke and air quality from fires is an evolving issue that does need to be better considered in land based fire management activities. However, we do not think it is necessarily appropriate to use the ACCU Savanna methods to manage this larger issue alone. We will, however, require project proponents to explain in the project management plans that they have considered the possible impact of smoke, and that their management plans incorporate this kind of consideration.

This does not require proponents to measure or predict exact pollution levels on a given day. It is simply a requirement to show that air quality and considerations of possible impacts of smoke is part of their planning decision making process. For example, a proponent might recognise that burning and northerly winds would direct smoke toward nearby communities and decide to wait for different conditions, taking into account all the other considerations that take into account when you think about when to burn.

But that decision will simply be documented as part of normal fire planning and the project management plan. We recognise that air quality monitoring and forecasting is currently limited in many remote areas, so this requirement is deliberately flexible and non-prescriptive. The simple method guides being produced by the Clean Energy Regulator will point proponents to existing sources of air quality information and national standards to support inform planning by allowing proponents to develop approaches suited to their local conditions, we expect a range of practical strategies to emerge over time as air quality data and forecasting improves in future.

The methods allow for more specific requirements to be added through updated technical guidance if needed.

Okay, getting close to Q&A everyone, but first, let's talk to rainfall zones. During consultation. We actually got quite a bit of feedback questioning whether the existing high and low rainfall zone boundaries still accurately reflect conditions on the ground. One particular proponent argued that parts of the current boundary do not align with local rainfall patterns and should be shifted, including suggestions to move the boundary further south in some regions.

In response, we did look closely at how the current rainfall zones were developed and what they intended to represent. These are the same rainfall zones that have been getting used for quite some time. These existing zones are based on long term Bureau of Meteorology rainfall data, and they're based on both the amount, but also the

seasonality of rainfall, which are critical drivers of vegetation growth, fire behavior and common outcomes.

We considered whether the evidence provided or in consultation demonstrated a material misalignment that would justify changing the boundary, now, while some local data showed higher rainfall in specific areas, that evidence did not consistently account for rainfall seasonality or suggest that the current spatially consistent national approach was no longer accurate. Based on that assessment, we decided to retain current rainfall zone boundaries for now, as they remain the most robust and conservative basis for national scale carbon accounting.

Changing the boundary without a full validated reassessment would carry a risk of over crediting rather than under crediting, which would undermine Scheme integrity. This means projects may be slightly unaccredited in some edge areas, but that approach is considered preferable to introducing integrity risks. At the same time, we do recognise that rainfall patterns are not static and that they are likely changing and that improve data and future analysis may justify changes over time.

As a result, the new savanna methods explicitly allow the rainfall zone spatial maps to be updated in future without requiring a full method remake. This creates a clear pathway to revise the boundaries is sufficient new evidence emerges and is validated through proper assessment and consultation. Proponents. Proponents that are interested in driving an update of the rainfall maps should consider submitting an expression of interest in carrying out this work as part of the proponent led method development process.

However, any future update to rainfall zones would be subject to public consultation and integrity assessment to ensure consistency, transparency and confidence in credited outcomes.

Building on the decision to allow rainfall zones to be updated with time, we also heard feedback about whether the savanna methods could eventually apply to other regions, particularly the Northern Arid Zone. Rather than hardwiring fixed geographic limits into the methods, we deliberately designed them to remain adaptable where science supports it. The same flexibility that allows rainfall zone boundaries to change over time also creates a clear pathway to respond to this broader regional feedback.

While the Northern Arid Zone is not included at this stage, the methods are not locked in a way that would permanently exclude it, and we know there's a process underway to make changes. Importantly, this flexibility allows potential future inclusion without requiring a formal method variation, provided all other elements of the methods remain unchanged. So, any expansion to the Northern Arid Zone could be enabled through

targeted updates to the technical guidance document and the associated spatial layers that define the zones.

These documents together define where method vegetation parameters applied to where they are. Any proposal to include the Northern Arid Zone without a method variation would need to demonstrate that the existing settings and just alone, changing those settings in the technical guidance document and associated spatial layers will mean that their projects can continue to meet the offset integrity standards, and so that those existing settings for other elements like eligibility in the method, are the right settings for those projects, also.

Therefore, whether the Northern Arid Zone can be included without a method variation depends very much on the outcomes of the proponent led method development process. But certainly, we think there is a pathway through this approach.

The process will need to show that fire behavior, vegetation dynamics, and carbon outcomes in Northern Arid Zone can be reliably and conservatively accounted for, and those projects can be run in those areas using the existing framework in the method, with just some updates to the technical guidance document associated spatial layers. If that evidence is established to the area, they agree the flexibility built in the methods allows the Scheme to respond efficiently without reopening the legislative instrument itself and requiring a method variation.

Okay, last little bit. Let's talk a little bit on this transparency. This transparency changes in the rule. Now vegetation fuel type maps are core input to savanna fire management projects. They show where different types of vegetation occur across a project area, which then directly ties into the kind of calculations we do. During public consultation, we heard concerns that land clearing might not be adequately accounted for in savanna method abatement calculations.

In particular, stakeholders question whether cleared areas were properly identified excluded and deducted from abatement. We also heard concerns that limited public access to project information made it difficult for external observers to be confident in the integrity of the method. In response, we closely examined how land clearing is handled in practice, and we closely examined the specific areas that were brought to our attention.

The methods do not prevent land clearing, but they do ensure that any cleared areas within a project boundary do not contribute to abatement calculations. Our investigation confirmed that the specific cleared areas raised by stakeholders were already mapped as ineligible land, and were therefore not contributing to abatement. We also found that the exposure drafts of the methods already included controls to

ensure that if land is cleared during the life of a project, this change is reflected in the accounting.

We'll talk through how that happens. Where clearing occurs. So there is a change in the type of landscape from the beginning to the end of the project. Proponents are required to update the vegetation fuel type maps. The updates are done by basically classifying those areas as containing ineligible areas. They would have been classified as a particular vegetation type.

Now they're getting classified as ineligible areas. Proponents have an obligation to do those updates where they are those changes. Now, what that means practically is that those areas are seen as ineligible areas, and therefore they're treated as contributing zero carbon to the relevant carbon pools. And any baseline carbon previously attributed to those areas is subtracted from future calculations. It also not considered forward emissions.

So while we are satisfied that cleared land was already being appropriately accounted for and continues to be under these new methods, we recognise this is not always visible to people outside the Scheme. And of course, perception of integrity is just as important as integrity. In other words, the integrity safeguards existed. They were not always transparent or easy to identify, identify, independently, verify.

To address this, we focused on strengthening transparency rather than changing the underlying accounting rules. The CFI rule has been amended commencing from tomorrow to require the Clean Energy Regulator to publish project level vegetation fuel type maps, subject to a narrow exemption where sensitivities or contractual restrictions apply. This won't happen immediately. The Clean Energy Regulator has better time to do this.

And there is a bit of time for proponents to apply to be exempt from this. In particular, one of the exemptions. So so the same exemptions will apply as for any other publishing of information. One of those existing exemptions for instance, relates to risks to vegetation, sensitive vegetation and that kind of thing. There is a new exemption that's also going to apply here, and that's where there might be a contractual constraint on publishing the map.

So let's say a proponent has contracted someone to create this vegetation fuel type map as part of that contract. they're not, you know, the the person creating the map has said you may not publish this map. Of course, in that that case, we don't want to put people in any impossible situations. So, in that case there are exemptions that apply.

If these exemptions do apply, the regulator will seek to still publish a version of the map that only shows the location of ineligible areas. Now, what that means is anyone can have a look at an area and see whether an area is being excluded from abatement calculations.

And have confidence, therefore, that if they're seeing an area that is perhaps cleared, that this is not being contributing to any ACCUs.

It also means, of course, that if a third party notifies the regulator that a cleared area has been incorrectly mapped as eligible, the regulator will follow up with the proponent, who must then update the vegetation fuel type map accordingly. You're not necessarily going to get in any kind of trouble because, you know, some let's say someone else has cleared that area, not you, but you will certainly have to update your vegetation, fuel type map and any abatement will be adjusted.