

7 October 2024

Department of Climate Change, Energy, the Environment and Water  
via [consultation survey](#)

To whom it may concern,

**Re: Feedback on the proposed amendment to the Carbon Credits (Carbon Farming Initiative) Rule 2015**

We write to provide feedback on the exposure draft of the *Carbon Credits (Carbon Farming Initiative) Amendment (2024 Measures No.2) Rules 2024* ('the Rule'), which was recently released by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) for public comment.

The CFF is a not-for-profit organisation, delivering high quality carbon projects at scale across Australia. We are committed to the continual improvement of the ACCU Scheme to ensure market integrity and would like to thank the Department for their commitment to implementing the recommendations of the Independent Review of ACCUs.

The addition of Part 12 of the Rule promotes greater transparency through the publication of project data, building public confidence in the Scheme by allowing for greater market scrutiny. Publication of detailed project information also provides market participants with the opportunity to make informed purchasing decisions, thereby driving demand for high quality projects that meet specific buyer needs.

We suggest that the Department consider the following additions:

- Whether other data requirements could be included that would further enhance transparency, such as project audit information and co-benefit information. This could also include opportunity for proponents to release extra project detail voluntarily.
- A provision allowing for withholding of data where it can be demonstrated that there are valid commercial or non-commercial sensitivities involved.

The CFF is supportive of the inclusion of the draft amendment as released and would like to thank DCCEEW for considering our feedback.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Samuel Bean', written in a cursive style.

**Samuel Bean**  
**Head of Methodology Compliance**