



## SUBMISSION GUIDE

The NSW Government has proposed a nationally applicable method for creating carbon offsets after false suggestions that they are needed to pay for ending or reducing native forest logging.

The method is currently under consideration by the NSW Department of Climate Change, Energy, Environment and Water and a submission period is open until 11th July 2025. If progressed, the Federal Government will also run its own public consultation period at a later date.

You can read more about the proposed method [here](#).

### How to make a submission

1. Download our [submission template](#) (or create your own!)
2. Use the 'Key Information' provided below to help you write your submission. If you'd like further information, our recent [Forest Carbon Brief](#) goes into much more detail. We suggest using your own words as much as possible and adding in any details regarding your own experience
3. Send your submission to [npws.carbonmethod@environment.nsw.gov.au](mailto:npws.carbonmethod@environment.nsw.gov.au) by 11th July 2025
4. Send us a copy! This is of course optional, but we'd love to read your submission if you're happy to share it to [contact@wildernessaustralia.org.au](mailto:contact@wildernessaustralia.org.au)

## Key Information

### Carbon Offsets

- ACCU schemes are not an instrument for reducing carbon emissions: they are an offset mechanism which allows big emitters to continue their use of fossil fuels.
- Australia is overly reliant on offsets to meet its emission reduction targets - something that must change if we are to genuinely reduce our use of fossil fuels.
- Carbon credit markets all over the world have been beset with fraud for decades. So called 'land-based offsets' were excluded from the original Kyoto Protocol on the basis they were too hard to oversee.
- Public native forests should not be used to generate carbon offsets, as this will negate the climate benefit of forest protection.

### Native Forest Logging

- Native forest logging is ecologically destructive, economically unviable and disastrous for our climate. The benefits that would be provided by ending native forest logging are therefore vast and should be recognised.
- Logging is destroying the habitat of around 150 threatened forest-dwelling species in NSW alone. Some of our most iconic animals – gliders and koalas – are now listed as endangered.
- Since 2020, FCNSW has lost almost \$90 million in its Hardwood Division and has been fined almost \$2 million for the unlawful destruction of threatened species habitat and related environmental breaches.

### Forest Carbon

- Concentrations of carbon in the atmosphere are now so high that net zero targets cannot be achieved by the reduction of emissions alone, but also through the removal of the carbon that has already accumulated in the atmosphere. This can only be done by living ecosystems, especially forests.
- When logging is stopped, there are four kinds of climate benefits:
  - the significant annual gross emissions from logging operations cease;
  - additional sequestration occurs because existing forests are allowed to keep growing past the age at which they would normally be logged;
  - the risk of forests releasing carbon in the future is reduced; and
  - the ability of forests to adapt to already locked in climate change is improved.
- If Australia stops logging and land clearing it can meet its 2030 emissions targets ([ANU, 2022](#)). In the example of Tasmania, substantial reductions in logging caused the State to actually achieve net negative emissions in the accounting period 2012-2018 ([Mackey et al. 2022](#)).

## **Acknowledging Forest Benefits**

- The Australian community overwhelmingly regards the protection of native forests as a public good. Communities benefit from all the services provided by forests like clean water, tourism revenue and climate mitigation benefits. Governments must acknowledge these benefits for what they are.
- Carbon benefits from ceasing logging would automatically be reflected in State and Federal Greenhouse Gas (GHG) accounts. Carbon credit schemes do not have the purpose of protecting forests or biodiversity. Their role is to turn forest carbon into a tradable commodity.

## **The Issues with the Proposed Method**

The proposed Improved Forest Management in Public Native Forests (IFM) method provides for a choice of eligible activities: the cessation of logging, the reduction or deferral of logging and “storing carbon in harvested wood products”. The application of the last two activities would introduce a host of additional problems including:

- The data underlying the method and modelling used to determine the number of eligible carbon credits is of doubtful accuracy.
- The arrangements for monitoring and regulation to ensure that logging is either ceased or reduced permanently are weak.
- The arrangements to prevent the actual increase of logging outside the carbon project area are weak.
- And worse, the scheme ignores the urgent need to restore the resilience of forests: their capacity to resist threats associated with climate change.

Decisions about which activity is used to claim ACCUs will be open to manipulation and blind to forest conservation needs.

## **Additionality**

Additionality is an integrity requirement that must be met under the proposed method.

- The IFM method proposes a 15 year crediting period utilising an historical baseline drawn from the previous 10 years of logging.
- It depends upon the confected assumption that without the creation of ACCUs, State and Federal governments are unlikely to do anything to protect high quality koala or glider habitats currently being destroyed by logging, for the next 15 years.
- Not only does this assume that the existing and powerful community demand for an end to native forest logging will have no effect upon Government, but also that the native forestry industry will still be viable.

- It's been widely reported that the Forestry Corporation NSW's hardwood division - made up of mostly native forestry - runs at a perpetual loss. The recently released [NSW State of the Environment report](#) also shows that native forest logging has declined 61% since 2017, a rate that would indicate the industries obsolescence - by economic parameters alone - well within the next 15 years.

## **Baseline**

The proposed baseline for the assessment of 'additionality' ignores reality in many critical ways:

- It does not try to assess the real, existing condition of native forests or the habitat and recovery needs of wildlife.
- It takes no account of the unprecedented and very long term impact of the catastrophic bushfires of 2019/20, and how those impacts will amplify future catastrophic events and reduce wood supply from native forests.
- It ignores climate change and the way that logging will interact with drought and fire to increase the severity of wildlife habitat destruction, while dramatically reducing the viability of ongoing native forest logging.
- It seeks to establish a baseline without any reference to the recent and dramatic declines in the market for native forest timbers that continue to occur in the real world.

## **Other Key Points**

- If approved, this method would be applicable not just in NSW, but also in Tasmania and Queensland, the other states where native forest logging has not yet ended.
- If the NSW Government is allowed to generate carbon credits for the proposed Great Koala National Park – notwithstanding a long-term political commitment to do so anyway – that will be a breach of the common sense understanding of the requirement for 'additionality' under any ACCU scheme.