Submission Template

Emissions Reduction Fund draft determination
Carbon Credits (Carbon Farming Initiative—Beef Cattle Herd Management) Methodology Variation 2016

Overview
This submission template should be used to provide comments on a draft Emissions Reduction Fund determination

Contact Details
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<th>Name of Organisation:</th>
<th>MDH Pty Ltd</th>
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<td>Date:</td>
<td>15 August, 2016</td>
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Confidentiality
All submissions will be treated as public documents, unless the author of the submission has requested that the submission not be published on the grounds that its publication could reasonably be expected to substantially prejudice the commercial interests of the author or another person. Public submissions will be published in full on the Department of the Environment’s website, including any personal information of authors and/or other third parties contained in the submission. Confidential submissions will not be published but will be provided to the:

- Department of the Environment and Energy;
- Emissions Reduction Assurance Committee; and
- Clean Energy Regulator.

If any part of the submission should be treated as confidential then please provide two versions of the submission, one with the confidential information removed for publication.

A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential?  

Yes  X  No

Submission Instructions
Submissions should be made by close of business on the day the public consultation period closes for the determination. This date will be specified on the website. The Department reserves the right not to consider late submissions.

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – EmissionsReductionSubmissions@environment.gov.au

Submissions may alternatively be sent to the postal address below to arrive by the due date.

ERF Governance, ERF Division  
Department of the Environment  
GPO Box 787  
CANBERRA ACT  2601
General/overall comments

The proposed methodology **25. Inputs in the crediting period**

(2) For the purposes of paragraph (1)(c), the project proponent may calculate the average liveweight of all animals in the herd of a particular livestock class at the beginning of the crediting period by:

(a) weighing all the animals in the livestock class within one month before or after the beginning of the crediting period

(b) weighing all the animals in a statistically valid sample from the livestock class within one month before or after that date.

We are planning to partake in a Beef Herd Cattle project and wish to make the following comment on the proposed new methodology in relation to the input dates.

Some of our herds are mustered early in the year starting in January and others later starting in April. This is primarily related to weather, especially the end of the rains in northern Australia. Hence the mustering of our herds in our proposed project will be conducted over a relatively long period.

Available resources on each property dictate that we muster and weigh the cattle over a relatively long period, of the order of 6 to 9 months. This is considerably longer than the 2 month window allowed by the proposed methodology to gather these data.

To conduct a second muster to take samples is highly impractical and will place an additional burden on the well being of the cattle as well as an increased economic cost.

It is noted that the crediting period for the project is seven years. Unless there is flexibility on the timing of the input date we will not be able benefit for a full seven years from the investment in the project and presumably the carbon offset from the project will not be at full potential.