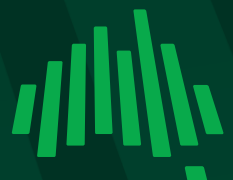


National
Farmers
Federation

2024 Public Release Version of the Full Carbon Accounting Model (FullCAM)

September 2024



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



13 September 2024

FullCAM Team
Department of Climate Change, Energy, the Environment, and Water
King Edward Terrace
Parkes ACT 2600

Email: fullcam@dcceew.gov.au

RE: 2024 Public Release Version of the Full Carbon Accounting Model (FullCAM)

Dear Sir / Madam,

Overview

The National Farmers' Federation (NFF) welcomes the opportunity to provide a submission to the Department of Climate Change, Energy, the Environment, and Water. The 2024 public release version of the FullCAM accounting model contains key updates to the updated plantation and mallee planting calibrations, new climate data, and a recalculated forest productivity index for all years since 2001. NFF notes that changes to climate data have been made to address recently discovered data inaccuracies from the NOAA/AVHRR satellite's degraded sensors. A rationale for why new spatial data has been introduced for the Forest Productivity Index using Moderate Resolution Imaging Spectroradiometer time series beginning from 2001, specifically, has not been and needs to be provided.

Update Process

The Department must clearly communicate what work has been commissioned on FullCAM, the rationale for such work, and its expected outcomes before work is undertaken on future FullCAM versions. NFF support sensible update measures to incorporate new data and information to ensure carbon accounting for activities under FullCAM are achieved more accurately and provide best available information to users. This is a standard process by Government to ensure estimations are accurately reflecting on-ground abatement at the project scale. Data updates to FullCAM, however, must be supported by a robust review process and publishing of a complete change log relative to the previous version. This would ensure accuracy in FullCAM results prior to public release and allow the model to be more auditable for user groups. Previous versions have had substantial errors embedded discovered post-release that should have prevented a public release from moving forward. Such errors do have significant negative consequences for FullCAM users and steps need to be taken to ensure errors are identified, addressed, and removed.

FullCAM must be relied upon with confidence, and as such, there needs to be continued investment and ground-truthing to proof the model. This should be supported by deliberate effort to ensure the model is capturing better data in remote areas.

Grandfathering Arrangements

Updates to FullCAM must be undertaken in a manner that does not compromise existing projects (i.e., grandfathering mechanism). Standard grandfathering arrangements for FullCAM models must be retained. Removal of such arrangements will impact long-term investment certainty as existing projects will be required to switch to the up-to-date version without any transitional arrangements provided to support such action.

Adoption and User Accessibility

The NFF are also concerned that the new product will not be able to be seamlessly adopted. If there is a need to delay the reforms to ensure that user groups are able to interact and utilise the updated tools, then we would support that.

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au at the first instance to progress this discussion.

Yours sincerely,



TONY MAHAR
Chief Executive Officer



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Leading
Australian
Agriculture

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