



**cassowary
credits**

Cassowary Credit Standard – Public Consultation Feedback 2024

We have extracted the feedback received in submissions during the Public Consultation (1 October 2024 – 30 October 2024), in response to the Cassowary Credit Standard and supporting documents. *Each submission has been extracted directly as written, however for the purpose of de-identification, Eco-Markets Australia has replaced identifiable names with 'Respondent x' throughout the responses.*

EMA is now working through the feedback and will finalise the Standard review in the coming months.

Public consultation responses:

Section 1	Version and Review
RESPONDENT A:	
Section 2	Introduction
RESPONDENT A:	
2.1	Objective of this Standard
RESPONDENT A:	
2.2	Governance

RESPONDENT A:	Technical Advisory committee should also consult/include local restoration NGOs (such as TREAT who as experiences in restoration in certain local upland areas); land management and restoration businesses (e.g. FNQLMS) and scientist working on restoration practices
RESPONDENT C:	More clarification on the role of the TAC would be helpful, especially their expertise and role on the governance of CCS – Also, since Eco Markets is located outside of the Wet Tropics, it would be helpful to get a better understanding of how they are educated on the plant growth processes and communities in the area.
2.3	<i>Interpretation</i>
RESPONDENT A:	Can these documents be merges in a sensible way? It appears to me that too much material/ documentation has accumulated.
Section 3	<i>Scope and Application</i>
RESPONDENT A:	
3.1	<i>Scope</i>
RESPONDENT A:	In all provided documents I did not find much information on scopes listed under b) and c). For example: Is this scheme linked with the Nature Refuge Program of Qld? Is this scheme linked with pest control? (I think that this scheme's scope is just the one mentioned under a)
3.2	<i>Cassowary Credit Unit and Conversion Factor</i>
RESPONDENT A:	Biodiversity credit based on improved rainforest conditions; it is not a carbon credit; make this clear
3.3	<i>Voluntary and Compliance Markets</i>
RESPONDENT A:	
Section 4	<i>Scheme Requirements for Regional Benefits</i>
RESPONDENT A:	
4.1	<i>Financial Return to Rightsholders</i>
RESPONDENT A:	Explain “secondary trading”

4.2	<i>Free, Prior and Informed Consent</i>
RESPONDENT A:	
4.3	<i>Working with Rainforest Aboriginal People</i>
RESPONDENT A:	
4.4	<i>Working with Regional Communities</i>
RESPONDENT A:	
4.4.1	<i>Using Approved Operators</i>
RESPONDENT A:	<p>- no list of Approved Operators could be found on EcoMarkets webpage - I consider the requirement of using an Approved Operator as a barrier; specifically when this requirement is linked to the inclusion of Aboriginal people; If Approved Operator inclusion is needed to maintain minimum standards in restoration practices, this should be based on skills of an operator, not on ethnical background of operator's employees; keep a fair market; avoid discrimination of businesses and placing barriers to proponents who want to participate in this scheme Suggestion: delete points 3 and 4</p> <p>Point 5 b and c: although I acknowledge that using experienced operators for rainforest condition improvement allows to maintain the required standard, I see more admin work resulting from these points (as of outline skills, experiences etc etc of a non-approved operator) – keep this simple.</p>
RESPONDENT B:	What exactly is meant by “Proponents must preferentially use those [RF aboriginal people] Approved Operators”? How is this determined/enforced?
4.4.2	<i>Requirements for Approved Operators</i>
RESPONDENT A:	<p>Delete ii) under point 4. This only adds a barrier to the adoption of this scheme; keep it simple and accessible; Consider options for scientists and educational organisations who do research on restoration practices to become part of this scheme Point 7: no list has been found on the webpage; eliminate any conditions that pose a barrier to the uptake of the scheme by proponents</p> <p>I assume that the use of an approved operator will incur costs for the proponent. If so, this will reduce the uptake of this scheme by people interested in rainforest restoration. Can EcoMarkets assist landholders in identifying and using available grants for rainforest restoration?</p>

RESPONDENT C:	Approved Operators seem to have a large role in each Program – clarification would be helpful for Proponents who would also like to be Approved Operators for their replanting projects (also would be helpful - more info on the application process and timeframe for Approved Operators).
Section 5	<i>General Eligibility Requirements</i>
RESPONDENT A:	
5.1	<i>Minimum Standards for Proponents</i>
RESPONDENT A:	Eliminate the “Fit and proper person test”. This sounds like a “police clearance’ and is not necessary. Funding bodies usually don’t ask for this, even if there is a large grant involved.
5.2	<i>Approved Cassowary Credit Scheme Methodology</i>
RESPONDENT A:	A list of Methodologies hasn’t been found on the Secretariat’s website. From the document: “Replanting Methodology...” I infer that Methodology in this context means the description of processes such as project application, verification, field measurements of indicators, application of models, calculation of credits etc., but does NOT mean the steps of a rainforest planting itself. If the Methodology describes steps of the planting process, this would create another barrier to the uptake of the scheme, particularly in the context of research on best restoration practices where flexibility and adjustments are required. Main content of the documents should be , in my view, the description of measuring change (monitoring), conversion of CIU to credits, trading
RESPONDENT B:	‘Methodology’ is a bit of a confusing term in this context.
5.3	<i>Positive and Negative List</i>
RESPONDENT A:	Point 4 excludes any projects that aim at research of restoration practices; What about interventions that are needed to avoid reversal of the condition change? Interventions may be necessary immediately and there won’t be time for lengthy approval processes. Adding a 30 day public consultation process is, in my view, not necessary. A review by experts of the Technical Advisory Committee is sufficient to make a new technique available for other proponents.
5.4	<i>Legal Right and Consent Process</i>
RESPONDENT A:	

Section 6	<i>Project Requirements</i>
RESPONDENT A:	
6.1	<i>Crediting Period</i>
RESPONDENT A:	
6.2	<i>Project Location, Project Area, Methodology Area and Management Units</i>
RESPONDENT A:	Does it allow enough flexibility for a restoration project? Any research projects would potentially use a different terminology (such as controls and treatment plots). Can this be simplified by just explaining the need for monitoring in a replicated way?
6.2.1	<i>Project Location</i>
RESPONDENT A:	As of above
6.2.2	<i>Project Area</i>
RESPONDENT A:	As of above
6.2.3	<i>Methodology Area</i>
RESPONDENT A:	As of above
6.2.4	<i>Management Unit</i>
RESPONDENT A:	As of above
6.3	<i>Projects with Multiple Activities</i>
RESPONDENT A:	I am again a bit confused here: so does a Methodology describe the planting steps (prep of site, planting etc) or not (as of my comment above)
6.4	<i>Additionality</i>
RESPONDENT A:	Point 2i: isn't this in contradiction to scope mentioned under b (in section 3.1). please clarify scope-Methodologies connection
6.4.1	<i>Other Environmental Markets</i>
RESPONDENT A:	

6.5	<i>Safeguards</i>
RESPONDENT A:	
6.6	<i>Permanence</i>
RESPONDENT A:	
6.7	<i>Risk of Reversal</i>
RESPONDENT A:	
6.8	<i>Leakage</i>
RESPONDENT A:	
Section 7	<i>Project Application, Validation and Registration</i>
RESPONDENT A:	
7.1	<i>Project Application</i>
RESPONDENT A:	
7.2	<i>Validation of Project Application</i>
RESPONDENT A:	<p>Fee schedule could not be found. Ensure that the fee is reasonable and does not discourages landholders in participating in this scheme, and , instead, participate in schemes of carbon markets. Have application process, validation process, monitoring processes, fees etc been compared to existing carbon market schemes to see whether this proposed Cassowary Credit Scheme is attractive (MORE attractive than participating in other schemes)?</p>
7.3	<i>Registration of Project</i>
RESPONDENT A:	How long will registration process will take ?
Section 8	<i>Project Start Date</i>
RESPONDENT A:	

Section 9	Baseline
RESPONDENT B:	The maximum amount of time from collecting baseline data to beginning planting should be specified.
RESPONDENT C:	Baseline data may require a close timeframe with the time of replanting, at risk of potential changes to landscape from the time of data collection and replanting.
Section 10	Project Monitoring
RESPONDENT A:	
10.1	Monitoring Requirements
RESPONDENT A:	The selection of some essential and easily to measure indicator is appreciated. Can monitoring be done by proponent (or landholder) or is the use of an Approved Operator required?
10.2	Monitoring Period
RESPONDENT A:	
Section 11	Project Reporting
RESPONDENT A:	
11.1	Record Keeping Requirements
RESPONDENT A:	
11.2	Reporting Requirements
RESPONDENT A:	
11.2.1	Monitoring Report
RESPONDENT A:	
11.2.2	Calculation of Benefit to Rainforest Biodiversity
RESPONDENT A:	
11.2.3	Calculation of Credits

RESPONDENT B:	*See comment below
Section 12	Verification
RESPONDENT A:	Any fees for verification process?
12.1	Level of Assurance
RESPONDENT A:	
12.2	Requirements for Approved Verifiers
RESPONDENT A:	
Section 13	Registry
RESPONDENT A:	
13.1	General
RESPONDENT A:	
13.2	Registry Operation
RESPONDENT A:	Any fees for opening a registry Account? Remove point c
13.3	Cassowary Credit Issuance
RESPONDENT A:	Where is fee schedule? Fee for administering registered Cassowary Credit? Can proponent still get some income from participating in this scheme ?
13.4	Tracking and Transfer of Cassowary Credits
RESPONDENT A:	Has the Secretariat a list of potential buyers? Or does Proponent need to find buyers? Will EcoMarket assist in finding buyers? A list of interested buyers should be provided first as this would encourage potential proponents in participating in this scheme.
13.5	Cassowary Credit Retirement
RESPONDENT A:	Are retired Cassowary Credits a synonym for sold Cassowary Credits?
Section 14	Methodology Requirements

RESPONDENT A:	
14.1	General
RESPONDENT A:	Models as of expected changes based on differences in conditions/indicator measurements between restoration site and a mature rainforest?
14.2	Applicability Conditions
RESPONDENT A:	
14.3	Additionality
RESPONDENT A:	
14.4	Project Area Boundary
RESPONDENT A:	
14.5	Quantification to Benefit to Rainforest Biodiversity
RESPONDENT A:	
14.6	Project Leakage
RESPONDENT A:	
14.7	Approval of New Methodologies
RESPONDENT A:	Is this set up to adjust/apply the scheme's requirements to research projects? Skip 30 day public consultation process, Who is Methodology developer? EcoMarket? TERRAIN, Research organisation? Any landholder interested in developing/improving restoration practices?
14.8	Revising Methodologies
RESPONDENT A:	
Section 15	Non-Compliance
RESPONDENT A:	

Section 16	<i>Dispute Resolution</i>
RESPONDENT A:	No comments yet

Additional Comments on the DRAFT Standard and Supporting Documentation

<i>Respondent</i>	<i>Document</i>	<i>Feedback</i>
RESPONDENT A:	Standard	Negative list: use of glyphosate?
RESPONDENT B:	Methodology	In regard to section 9.3 of the Methodology: Calculation of Cassowary Credits – What is the conversion factor? How is it determined? Is this something that will regularly fluctuate, or will it stay consistent? Could the conversion factor change depending on the project, for example if a project is stacking with a carbon credit scheme?

