



# Consultation questions

The Integrated Farm and Land Management (IFLM) method is the first ACCU Scheme method to provide a modular framework for crediting multiple or ‘stacked’ abatement activities on the same property. The framework method is intended to streamline participation, reducing the administrative burden compared to running multiple projects on the same land. The framework method is designed to allow more activities, measurement technologies, calculation approaches and carbon pools to be added over time, including through the new proponent led method development process.

## Questions from the Department

The department welcomes all feedback on the proposed IFLM method. The Department would particularly value feedback on the following questions.

1. Are the modular framework provisions in the exposure draft sufficiently flexible to allow for the addition of activities, measurement technologies, and other carbon pools in the future?
2. Will the IFLM method remove barriers to participation in the ACCU Scheme for land holders?
3. The exposure draft allows projects to transition from existing projects under *the Carbon Credits (Carbon Farming Initiative – Reforestation by Environmental or Mallee Plantings – FullCAM) Methodology Determination 2024* and *Carbon Credits (Carbon Farming Initiative – Native Forest from Managed Regrowth) Methodology Determination 2013* to the IFLM method where they meet the eligibility requirements. Are there considerations for transferring projects that have not been sufficiently addressed in the exposure draft for these projects? What additional transitional provisions are required to enable existing Human-Induced Regeneration (HIR) projects to transition to the IFLM method?
4. Does the proposed method support rural and remote communities, including First Nations Australians, to participate in and benefit from the ACCU Scheme?
5. What additional project information for publication could be required to section 93A of the CFI Rule (‘Publication of relevant information’) to improve transparency and provide confidence that IFLM projects are generating genuine abatement?
6. In October 2024, the Government prioritised the Queensland Department of Environment, Science, Tourism and Innovation to develop the ‘Improved Avoided Clearing of Native Regrowth’ method, which may include activities similar to those in the IFLM method. The department welcomes any feedback from stakeholders on how the two methods could usefully co-exist to maximise carbon abatement while continuing to meet the offsets integrity standards (OIS).

## Questions from ERAC

ERAC welcomes all feedback on the proposed IFLM method and its compliance with the Offsets Integrity Standards. The Committee would particularly value feedback on the following questions.

7. Are the current restricted activities appropriate (see Part 3, Division 6 of the exposure draft)? Are additional restrictions required or are any restrictions no longer required?
8. The scientific literature suggests that grazing by herbivores (livestock and wildlife) may affect carbon stock accumulation in woody vegetation, but the impacts of grazing can be difficult to distinguish from the influence of rainfall variability and other factors. As a result, growth in woody vegetation cannot easily be attributed to changes in management practices. A suite of method settings is proposed that are intended to ensure credited abatement is additional and can be attributed to the project activities undertaken.
  - a. Is the range of method settings sufficient to ensure that any measured changes in woody vegetation are correctly attributed to changes in management practices?
  - b. If not, how might the scientific rigour and overall integrity of removal of grazing as a suppressant with respect to regeneration of woody vegetation be improved?
  - c. Will the range of method settings provide a conservative estimate of abatement?
9. A discount when issuing ACCUs is proposed to account for uncertainty in the attribution of regeneration of woody vegetation to the project activity. Different discount rates have been proposed for lower and higher rainfall areas, to reflect variable forest responses to rainfall and associated attribution uncertainty in these landscapes.
  - a. Is a 500mm average annual rainfall threshold an appropriate proxy for regions with higher and lower uncertainty of attribution? Should rainfall frequency, as well as average annual rainfall, be usefully incorporated into the method's settings and if so, how?
  - b. Would other proxies, such as vegetation type or ecosystems, more accurately account for variation in the growth rate of woody vegetation?
10. The exposure draft includes an approach (the hurdle requirement) to manage possible leakage resulting from a project (see Part 4, Divisions 4 and 5 of the exposure draft). This refers to the risk that project activities may drive changes in agricultural activities outside of the Carbon Estimation Areas (CEAs), potentially including increased clearing or greater grazing intensity outside the CEAs.
  - a. Are the proposed requirements appropriate to manage the risk of leakage and minimise the transaction burden for projects?
  - b. Are there other project emissions beyond a change in carbon stock that should be accounted for outside the project area, as they are also likely to be a result of leakage (rather than business as usual land management practices)?
  - c. Should additional discounts apply to account for the risk of leakage?
11. The exposure draft includes an approach where areas not stratified as CEAs or exclusion areas must be stratified as Vegetation Accounting Areas (VAAs) for applying the hurdle

requirement (Division 4, section 15 and 16). It is intended an exclusion area is an area without vegetation and where vegetation will not grow (i.e. waterways, infrastructure, rocky outcrops or roads). It is proposed the CFI Mapping Guidelines will be updated in line with this – if required.

- a. What issues might arise if the CFI Mapping Guidelines were updated to reflect only these areas that can be mapped as exclusion areas?
12. What are the benefits and risks if landscape rehydration were to be included as an eligible management activity in the 'suppressed land' module?
  - a. Are restrictions required to ensure hydrological management does not lead to leakage or adverse impacts on broader landscape hydrology?
  - b. Are any of these concerns managed through existing regulatory requirements?
7. The exposure draft proposes a new measurement approach that combines the use of FullCAM with local measurements derived from deploying remote sensing technologies (the FullCAM-Measure Hybrid approach). The FullCAM-Measure Hybrid approach proposes that measurements are taken at 5-yearly intervals for carbon stock and canopy projection cover – the intent being that this enables more accurate calibration of the Tree Yield Formula.
  - a. From a scientific or project implementation perspective, are there any technical considerations that suggest the proposed approach for the FullCAM-Measure Hybrid approach should be adjusted?
  - b. Are disturbance events appropriately accounted for in the proposed approach?
  - c. The method includes a 40% Tree Yield Formula discount to manage the uncertainty associated with the FullCAM-Measure Hybrid approach, which would be returned if the project's abatement is demonstrably achieved in year 25. Does the proposed approach to use the Tree Yield Formula discount conservatively address uncertainties in sampling and calibration?
  - d. Do you foresee situations when proponents may switch between spatially referenced / spatially explicit sampling approaches between reporting periods? How can this be facilitated while maintaining the integrity of the sampling approach?
  - e. Should the method allow projects to be credited based on direct sampling of biomass without the use of the Tree Yield Formula. For example, using multi-phase sampling and validated maps that are trained using LiDAR?
  - f. Could the method be improved by allowing other project activities to use the FullCAM-Measure Hybrid approach?
8. The exposure draft requires a qualified person to assess the land management strategy. Do the proposed requirements defining a qualified person (see sub-section 22(9)) strengthen confidence the project eligibility requirements are being met and manage risk of insufficient available qualified persons? Is the qualified person definition sufficiently broad to capture First Nations knowledge holders?