

11 April 2025

Emissions Reduction Assurance Committee
Department of Climate Change, Energy, the Environment, and Water
GPO Box 2013
CANBERRA ACT 2601



Via email: ACCUSecretariat@dcceew.gov.au

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To Whom It May Concern

Re: Review of ACCU Scheme's Soil Organic Carbon method 2021

The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland. Our members are agricultural peak bodies who collectively represent more than 13,000 farmers who produce food, fibre and foliage across the state.

QFF's peak body members come together to develop policy and lead projects on the key issues that are important to their farmer members and the Queensland agriculture sector.

Together, we form a strong, unified voice leveraging our effectiveness by working together to drive policy and initiatives that support a strong future for Queensland agriculture.

QFF welcomes the opportunity to provide comment on Emissions Reduction Assurance Committee' (ERAC) periodic review of the Australian Carbon Credit Unit (ACCU) Scheme's Soil Organic Carbon method 2021. We provide this submission without prejudice to any additional submission from our members or individual farmers.

Overview

The Queensland agriculture sector has long demonstrated its innovation and adaptability to advance Australia's economy and requirements for food, fibre and foliage security.

As the nation increases its effort to avoid the release of greenhouse gas emissions, and remove and sequester carbon from the atmosphere, it is crucial that the ACCU Scheme works effectively to support people and businesses to run projects that reduce emissions or store carbon. To be effective, the methods must be logical, implementable and have a long term view of the projected climate pressures and policy instruments that will be faced by people and business.

QFF welcomes the development of methods to support carbon abatement projects that deliver multiple outcomes to businesses and the environment, boost ACCU project numbers, and boost general confidence in the nation's carbon abatement scheme. Soil carbon sequestration delivers both climate and on-farm productivity benefits. The soil carbon methodology is recognised and well received, as reflected in the approximately 200 registered projects and the number of ACCUs issued to-date. QFF supports the opportunity to strengthen the approach to additionality, modernise the method to reflect current science and practices, and address the administrative barriers that continue to limit participation.

QFF understands that this Periodic Review will inform the development of the proposed Integrated Farm and Land Management (IFLM) Method. QFF supports the use of the current Soil Carbon method (2021) within the IFLM method with some improvements to address feedback provided

MEMBERS

Canegrowers
Cotton Australia
Qld Fruit & Vegetable Growers
Nursery and Garden Industry Qld

eastAUSmilk
Turf Queensland
Australian Chicken Meat Federation
Australian Cane Farmers Association

Pork Queensland Inc
Queensland United Egg Producers
9 Irrigator Groups Across Qld

further below. However, it is imperative that the IFLM does not pause or delay the implementation of the Soil Carbon Method, which will introduce interruptions, delays, uncertainty, reduce industry confidence and risk investments required to achieve the intended outcomes.

QFF instead recommends that the Soil Carbon method be strengthened in iterative improvements, to increase the practicality of its application and increase the intended outcomes of the method. QFF draws particular attention to the Irrigation method in QFF's feedback below.

Feedback

- QFF recommends no fundamental changes to the methodology and instead requests iterative improvement in consultation with irrigation and agronomy specialists on the 2021 method's approach to irrigation.
- The Irrigation method requires work. In its current form, the Irrigation method excludes significant areas of land from being included and prohibits businesses from being able to navigate and implement the method requirements
- The Irrigation method has failings in the context of climate change, drought and rainfall variability. The current methods require establishment of a water use baseline in a previous 5 year period and using this to set the limit for future water application over a 26-30 or 101-105 year permanence period. This method fails to consider climate variability, changing irrigation needs of producers, the usefulness of allocation allowances, and the role that precision irrigation plays in optimised irrigation management.
- QFF strongly recommends flexible irrigation limits and alignment with allocation limits.
- The definition of Irrigation needs to be clarified in the Methodology.
- QFF strongly recommends that the Soil Carbon method continues to be applied, while the IFLM is being developed. QFF strongly urges the department to not impede the progress of businesses in applying the Soil Carbon method while iterative changes are developed and made, and while the IFLM is developed.

QFF also directs the ERAC to the QFF submission of the proposed IFLM, dated December 2023, and reiterates the points made in this document.

QFF has conferred with Carbon Link. In discussions with Carbon Link, QFF supports the issues that Carbon Link has raised concerning:

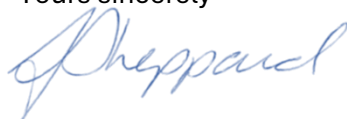
- The importance of maintaining consistency in the Soil Carbon method measurement and testing methods
- Lack of support for introduction of a modelled schedule in the Soil Carbon method
- Concerns about source data in the Mitchell paper.

QFF also supports the concerns and improvements that are raised by the National Farmers' Federation (NFF) relating to:

- Opportunities for new technologies to provide equivalent or improved confidence in measurement and verification methods
- The importance of not making any significant adjustments to the Soil Carbon method without emerging evidence from Australian field trials and producer-led projects.

Following the consultation period, QFF will be supportive of providing further input to the department from QFF's irrigator membership to improve the Irrigation method.

Yours sincerely



Jo Sheppard
Chief Executive Officer