



QUEENSLAND  
FARMERS'  
FEDERATION



## Proposed improved avoided clearing method

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Natural Capital Program  
Department of Environment, Tourism, Science and Innovation

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Natural Capital Program

Department of Environment, Tourism, Science and Innovation

Submitted via email at [natural.capital@detsi.qld.gov.au](mailto:natural.capital@detsi.qld.gov.au)

### Our members

- Queensland Fruit & Vegetable Growers
- Cotton Australia
- CANEGROWERS
- Greenlife Industry QLD
- eastAUSmilk
- Queensland United Egg Producers
- Turf Queensland
- Pork Queensland
- Australian Chicken Meat Federation
- Bundaberg Regional Irrigators Group
- Burdekin River Irrigation Area
- Central Downs Irrigators Ltd
- Fairburn Irrigation Network
- Mallowa Irrigation
- Pioneer Valley Water Co-operative Ltd
- Theodore Water Pty Ltd
- Eton Irrigation
- Lockyer Valley Water Users

# About the Queensland Farmers' Federation

**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.

## Introduction

The Queensland Farmers' Federation (QFF) welcomes the opportunity to engage the Department on the proposed Improved Avoided Clearing Method, now named the Avoided Re-clearing and Native Reforestation (ARNR) method. QFF welcomes several reforms in the exposure draft that move the methodology toward being more production-compatible and reflective of on-farm realities. Ultimately, QFF will support a methodology that:

- delivers high-integrity abatement
- is compatible with ongoing productive land use
- keeps administrative and compliance requirements proportionate so landholders of all scales can participate.

However, as outlined below, several design elements remain critical to ensuring the method is practical, socially robust, financially and intergenerationally workable, and capable of achieving meaningful uptake across Queensland.

## Recommendations

### 1. Property management planning and transparency

QFF agrees with the requirement for a Property Management Plan (PMP) and considers it essential that the PMP be a public document (published or otherwise publicly accessible at registration). The PMP must explicitly include, at minimum:

- a biosecurity plan (pest/pathogen/weed control and monitoring)
- a fire prevention and management plan (fuel management, prescribed burning or other risk mitigation, contingency arrangements).

These elements are integral to both environmental outcomes and the social licence of projects operating in rural communities. Appropriate public accessibility of the PMP promotes community confidence, enables neighbours and stakeholders to understand intended management approaches, and aligns the ARNR method with best practice across the Scheme.

### 2. Vegetation management, thinning and canopy control

The draft's recognition of ecological thinning is welcome, but it must explicitly permit repeat thinning events over the project lifetime. Given the long permanence periods contemplated under the CFI Act, single-event thinning will be insufficient to manage vegetation dynamics, fire risk and the ongoing operational needs of primary producers over decades. QFF seeks clear rules that:

- allow multiple thinning interventions subject to defined controls.
- permit canopy management as a tool for coexistence with ongoing land management and productive use by primary producers, including controlled reduction of canopy cover (for example, down to 50%) where ecologically justified and supported by the PMP.
- recognise canopy management as a means to enhance groundcover outcomes, including sediment control and landscape stability, alongside grazing and other productive benefits.
- require post-thinning monitoring to demonstrate that carbon integrity and ecological function are maintained.

Explicitly permitting canopy control in this way will make projects more attractive to landholders and a broader range of primary producers managing native vegetation for production, ecosystem services and pollination, and help align carbon outcomes with productive landscape objectives.

### **3. Social licence to operate and community impacts**

Carbon projects can alter land use in ways that have material impacts on neighbours and local communities, including access, visual amenity, fire risk and pest pressures. QFF considers it essential that methodologies explicitly recognise social licence to operate obligations and include a simple, mandatory notification requirement. Treating carbon projects consistently with other developments that change land use is both reasonable and prudent. At a minimum:

- Local council (and, where appropriate, relevant Landcare, pest, or NRM bodies) should be notified at project registration; and
- The PMP should record any local stakeholder engagement undertaken and identify foreseeable community impacts and mitigation measures.

Methodologies must explicitly acknowledge social licence to operate expectations for carbon projects from both neighbour and community perspectives, consistent with other developments that involve changes in land use.

### **4. Firm NO to compressed crediting**

QFF opposes any compressed or front-loaded crediting model. Credits should be issued when abatement is real and demonstrated, consistent with established ACCU practice. Compressed crediting increases risk and undermines intergenerational fairness; it also weakens community confidence that credited abatement is durable and could lead to an unintended consequence of long periods of unproductive landscapes later in the permanence period with limited flexibility for future decision-makers.

### **5. Crediting period vs permanence period**

More broadly, the gap between the crediting period and the permanence (for example, a 50-year crediting period within a 100-year permanence obligation) is a continuing concern. Such gaps introduce uncertainty for participants and communities. They also raise legitimate questions around long-term financial planning, succession, and the treatment of project obligations and income across generations. Reducing the gap will better align incentives and community expectations about how long land use is altered. QFF therefore:

- Supports extension of crediting periods where scientifically justified to reduce this gap (and/or),
- Requests adoption of an explicit policy pathway to offer a standard 25-year permanence/crediting option (or comparable measures) so that intergenerational lock-in is reasonably managed and participation is not deterred.

## 6. Interaction with broader regulatory reforms

QFF notes that ongoing reforms to the EPBC Act may materially affect the regulatory environment in which avoided clearing projects operate. It is essential that interactions between this method and Commonwealth environmental approval processes are clearly assessed and transparently communicated to prospective proponents, to avoid unforeseen compliance risks and costs, and to prevent misinformation or misunderstanding about participation pathways and potential downstream implications for land valuation, transfer, and estate planning.

## 7. Future integration

QFF strongly supports development of integrated, farm-scale approaches to environmental services. The proposed ARNR methodology should be designed so it can be seamlessly incorporated into a future Integrated Farm and Land Management (IFLM) Methodology. Practical steps include standardised PMP templates, compatible monitoring metrics and explicit cross-referencing in the method text to anticipated IFLM elements. This will future proof the method and lower transaction costs where producers wish to stack multiple outcomes.

## 8. Minor but important procedural items

- Ensure PMP templates and geospatial mapping templates are user-friendly and accompanied by technical support materials.
- Allow reasonable sampling approaches and tiered monitoring for smaller producers to avoid disproportionate FullCAM and GIS costs.
- Build explicit provisions for case-by-case exceptions on slope or region where local evidence supports eligibility, to avoid unintended regional bias.
- Ensure vegetation mapping required to establish projects or comply with restricted activities is easily accessible, current and fit-for-purpose, minimising duplication and administrative burden on proponents.

# Conclusion

QFF welcomes the department's direction on scope, stewardship and multi-activity projects. The positions above are practical, grounded and reflect the operational realities of Queensland

producers. Uptake will ultimately depend on whether the method recognises the realities of long-term land management, including intergenerational decision-making, financial and taxation considerations, social licence expectations, and the need for genuine coexistence with productive agriculture.

Yours sincerely

Jo Sheppard

Chief Executive Officer



**This submission is provided by the Queensland Farmers' Federation**

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