QUEENSLAND FARMERS' FEDERATION

Draft Integrated Farm and Land Management (IFLM) Method

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Emissions Reductions Assurance Committee (ERAC)

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This submission is provided to:

Department of Climate Change, Environment, Energy and Water (DCCEEW)
Emissions Reductions Assurance Committee (ERAC)
Submitted via email: ACCUScheme@dcceew.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
- Mallawa 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 submit feedback on the draft Integrated Farm and Land Management (IFLM) method determination.

QFF represents primary producers across Queensland's diverse agricultural industries and landscapes, many of whom currently participate in the ACCU Scheme or are actively assessing carbon project opportunities as part of long-term farm business planning. Farmers are practical decision-makers: they adopt approaches that deliver tangible benefits for their businesses and land. For the IFLM method to succeed, it must support real-world outcomes, be implementable under actual farm conditions, and provide clear commercial as well as environmental value.

QFF strongly supports the development of a nationally consistent, science-based IFLM framework capable of delivering high-integrity abatement while remaining compatible with productive agricultural land use. A well-designed integrated method has the potential to unlock substantial land-sector investment, accelerate adoption of improved land management practices, stronger farming enterprises and deliver durable carbon and environmental outcomes.

In its current form, however, the draft does not achieve this objective. Key priority modules, particularly soil carbon and avoided-emissions activities, are absent. It is critical that the soil carbon method integrates seamlessly within the IFLM framework, as soil carbon outcomes are intrinsically linked to everyday farm management decisions including grazing, cropping, inputs, vegetation management, and water use. Farmers cannot absorb a method that operates in isolation or adds unnecessary complexity.

As drafted, the method over-prioritises theoretical conservatism at the expense of practical implementation. Without a stable, practical, and reliable method that delivers clear results for farmers, confidence in the framework will erode, adoption will stall, and the potential environmental and commercial benefits of the IFLM cannot be realised.

Our responses follow.

Section 1: Questions from the Department

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?

QFF Position: *No.*

Rationale: The modular structure is conceptually sound, but without a funded, time-bound development roadmap, it risks remaining incomplete. Producers making 25-40-year investment decisions need certainty that priority modules, particularly soil carbon and avoided emissions, will be delivered on schedule. The draft provides no such assurance, asking landholders to commit capital without clarity on core activities. The framework must also support interoperability with future whole-farm or integrated methods through standardised metrics, data templates, and reporting structures.

Recommendation: Publish a clear module development roadmap alongside the final method, including confirmed timelines, resourcing commitments, and sequencing for priority modules. Explicitly confirm that activities not yet included are not permanently excluded from future integration.

Will the IFLM method remove barriers to participation in the ACCU Scheme for land holders?

QFF Position: *No.*

Rationale: The draft creates significant participation barriers while limiting potential cost efficiencies. The VAA hurdle, fixed uncertainty discounts, and binary vegetation thresholds increase transaction costs and compliance risk, disproportionately affecting remote producers and partial-property projects. After fees, returns may be insufficient to justify participation or secure financing. Compliance burden also rises with stricter leakage rules require monitoring entire titles, and additionality obligations may demand costly infrastructure such as fencing, watering points, and rotational grazing. The method prioritises an overly zealous approach to integrity at the expense of practical commercial viability. The draft also proposes monitoring leakage across all operations managed by a proponent. For many farm businesses carbon projects represent only a small component of broader land management and requiring monitoring across entire landholdings risks imposing disproportionate compliance costs. Leakage risks could instead be managed through Restricted Activities and Land Management Strategies targeted to relevant project areas.

Recommendation: Replace the VAA hurdle with a proportional deduction framework. Publish graduated, evidence-based uncertainty discount schedules. Adopt regionally calibrated attribution factors. Enable integrated activity design, including appropriate stacking. Provide technical guidance and pilot support at rollout to ensure the method is workable in real farm conditions. Confidence-based discounting may also provide an alternative approach. Under this model, modelled carbon stock changes could be periodically verified through measurement and statistical confidence intervals used to determine discount levels, rewarding proponents who invest in higher quality monitoring.

Are there considerations for transferring projects that have not been sufficiently addressed in the exposure draft?

QFF Position: *Yes.*

Rationale: The draft does not adequately address protection of previously issued ACCUs, baseline harmonisation, cost recovery for re-measurement or re-verification, or treatment of historic crediting. Without statutory transitional protections, proponents who invested under existing methods face genuine regulatory and financial uncertainty. The absence of clear baseline alignment protocols also creates risk of double-counting or unintended credit erosion. Interaction with external environmental approval frameworks may further introduce compliance delays or complexity if project conditions change.

Recommendation: Include statutory transitional provisions that protect previously issued ACCUs, establish technical baseline alignment protocols, allow phased reporting where hybrid measurement cannot immediately be met, and provide funded or subsidised transitional verification to avoid duplicative cost burdens. QFF also notes the draft allows transitioning projects to commence a new crediting period and does not require mandatory transitions. Clear guidance on how these provisions will operate in practice would improve confidence among existing proponents.

What additional transitional provisions are required to enable existing Human-Induced Regeneration (HIR) projects to transition to the IFLM method?

Rationale: Existing HIR proponents face transition risks not resolved in the draft, including potential double-counting of already credited sequestration, incompatible baselines, and increased measurement obligations. The new per hectare biomass threshold and 20-year suppression record requirements may render many existing HIR projects ineligible for transition despite their compliance history. This creates investment uncertainty and undermines confidence in scheme stability.

Recommendation: Explicitly recognise historic HIR crediting and prevent double-counting. Publish a clear protocol for mapping HIR baselines to IFLM requirements. Provide a defined transition window before full hybrid measurement applies. Fund or subsidise transitional verification where necessary to enable continuity. More broadly, the IFLM framework could operate most effectively as a platform that integrates compatible existing methods rather than recreating them internally. Referencing active methods would maintain consistency across the scheme and support fair treatment of projects transitioning between approaches.

Does the proposed method support rural and remote communities, including First Nations Australians, to participate in and benefit from the ACCU Scheme?

QFF Position: *No.*

Rationale: The draft contains no tailored participation pathways for rural, remote, or First Nations landholders. This is a material gap given Queensland's geography and land tenure structure. Satellite data alone is often unreliable in remote areas, requiring costly field calibration. The requirement for suppression records is particularly problematic where historic records are limited. The significant upfront credit withholding further undermines viability for smaller operators who lack balance sheet capacity to absorb extended liquidity delays. The increased compliance burden is therefore most acute for remote proponents.

Recommendation: Create simplified participation pathways that are meaningful and actually effective for remote and small-scale proponents.

What additional project information for publication could be required under section 93A of the CFI Rule to improve transparency and confidence?

Rationale: Transparency must be balanced against legitimate commercial sensitivity. Requiring publication of detailed operational data risks exposing intellectual property and commercially sensitive information. Such requirements would likely deter participation, particularly among producers who have invested heavily in innovative land management systems.

Recommendation: Limit mandatory disclosure to aggregated summary data: project area, activity type, crediting period, and cumulative ACCUs issued. Protect detailed operational and

spatial data unrelated to emissions outcomes. Allow voluntary opt-in publication of additional information.

How could the 'Improved Avoided Clearing of Native Regrowth' method (October 2024) co-exist with IFLM?

Rationale: Full integration of IACNR into IFLM is necessary to maintain abatement integrity and minimise administrative duplication. Separate attribution, boundary and reporting frameworks risk creating perverse incentives and unnecessary transaction costs. Avoided clearing activities must be recognised within broader farm-scale carbon management while preserving productive land use.

Recommendation: Design IFLM to incorporate IACNR activities with harmonised attribution, monitoring and reporting protocols. Standardise Property Management Plans, metrics and geospatial templates across both methods. Ensure stacking and migration rules prevent double-crediting while avoiding new compliance barriers.

Section 2: Questions from Emissions Reduction Assurance Committee (ERAC)

Are the current restricted activities appropriate (Part 3, Division 6)?

No comment.

Is the range of method settings sufficient to ensure measured changes in woody vegetation are correctly attributed to management?

QFF Position: *No.*

How might the scientific rigour and integrity of removing grazing as a suppressant be improved?

Rationale: A single national rainfall threshold and fixed attribution discounts are too coarse for Australia's ecological diversity. Applying uniform rules across Queensland's varied ecosystems will systematically misattribute carbon stock changes, either over- or under-crediting actual management outcomes. The shift from canopy cover to woody biomass further changes the fundamental measurement metric, introducing additional uncertainty that cannot be adequately captured by a single national threshold.

Recommendation: Adopt regionally calibrated attribution factors that integrate rainfall variability, vegetation type, soil and ecosystem classifications, remote sensing data, and disturbance history. Publish all datasets, assumptions, and calculation methods to ensure transparency.

Will the range of method settings provide a conservative estimate of abatement?

QFF Position: *No.*

Rationale: Fixed discounts and binary rules apply conservatism uniformly rather than in proportion to actual measurement quality. This will over-penalise high-quality projects while providing no additional protection for genuinely uncertain estimates, and removes the incentive to invest in more rigorous monitoring.

Recommendation: Replace fixed discounts with graduated, evidence-based schedules calibrated to sampling and verification quality. Reward higher-quality measurement with proportionally lower discounts to incentivise investment in rigorous monitoring.

How much average annual rainfall would be appropriate as a proxy threshold for higher/lower uncertainty? Should rainfall frequency be included?

Rationale: A single national threshold is inadequate for Queensland's highly variable rainfall regimes. Mean annual rainfall alone does not reflect interannual variability or seasonal distribution. The proposed 500 mm threshold is particularly misaligned with semi-arid systems like mulga, where growth responses differ significantly from the national average.

Recommendation: Adopt regionally calibrated rainfall thresholds incorporating both mean and interannual variability. Include rainfall frequency where demonstrably predictive of vegetation growth. Ensure thresholds are empirically derived and reviewed periodically. Allow regional exceptions based on local datasets.

Would other proxies (vegetation type, ecosystems) more accurately account for variation in growth rates?

QFF Position: *Yes.*

Rationale: Vegetation type, ecosystem class, soil texture, and disturbance history are demonstrably stronger predictors of growth response than rainfall alone. Relying on a single-variable proxy understates the complexity of Australian vegetation systems and produces less accurate attribution estimates.

Recommendation: Adopt a combined proxy approach integrating rainfall metrics with vegetation and ecosystem stratification variables. Publish the empirical basis for all chosen proxies, and include provisions for updating proxy variables as remote sensing and modelling capabilities improve.

ERAC Q7. Are the proposed requirements (hurdle) appropriate to manage leakage and minimise transaction burden?

QFF Position: *No.*

Rationale: The VAA all-or-nothing hurdle is disproportionate. It treats minor, routine operational clearing identically to deliberate leakage, creating strong disincentives for transparency. In Queensland, where properties are large and land use dynamic, monitoring entire titles imposes excessive costs, requiring infrastructure and administrative resources far beyond the scale of actual risk.

Recommendation: Replace the binary hurdle with a proportional deduction framework that adjusts credited gains according to actual carbon losses. Reserve strong penalties for material, intentional leakage only.

ERAC Q8. Are there other project emissions beyond changes in carbon stock that should be accounted for outside the project area (leakage)?

Rationale: Applying project-level measurement standards outside the project area is disproportionate. For pastoral enterprises, modelling VAA land outside project boundaries could impose exponential compliance costs.

Recommendation: Use simpler, proportional monitoring approaches outside project boundaries. Do not extend full project measurement requirements beyond the defined project area.

ERAC Q9. Should additional discounts apply to account for the risk of leakage?

QFF Position: *No.*

Rationale: Adding further automatic leakage discounts would compound existing conservatism and reduce commercial viability. With the 40% TYF discount and up to 25% attribution discount alongside the 20% permanence discount for 25-year projects and 5% risk of reversal deduction, upfront ACCUs may already be too low to support financing or cover project costs. In extreme cases total initial deductions may approach 90%.

Recommendation: Manage leakage via proportional deductions tied to measured or modelled outcomes. Reward rigorous monitoring with reduced discounts where low leakage is demonstrated.

What issues might arise if CFI Mapping Guidelines were updated to reflect only exclusion areas?

Rationale: Restricting guidelines to exclusion areas simplifies mapping for clear cases but introduces risk for projects with marginal or transitional vegetation, where the boundary between excluded and eligible land is genuinely uncertain.

Recommendation: If this approach is adopted, accompany it with detailed definitional guidance covering common marginal cases, consistent training materials for project proponents and auditors, and a clear appeals process for resolving boundary disputes.

Benefits and risks of including landscape rehydration in the 'suppressed land' module. What restrictions would be required?

Rationale: Landscape rehydration measures such as contour banks, infiltration channels, or micro-catchment restoration can enhance soil water availability, reduce nutrient loss, and improve crop establishment and yield stability. Where interventions result in measurable biomass gains (i.e., through cover crops, perennial plantings, or shelterbelts) producers could achieve both carbon banking and farm productivity co-benefits.

FullCAM-Measure Hybrid approach — what are the technical considerations for the proposed 5-year measurement interval?

Rationale: The validity of a five-year sampling interval depends on published protocols for sampling intensity, stratification, quality assurance, and disturbance response. Without these, proponents cannot assess financial or compliance risk, particularly for smaller or remote projects where satellite data may be unreliable and field calibration is costly.

Recommendation: Publish detailed hybrid sampling and calibration protocols prior to method commencement. Include minimum sampling intensity, stratification, confidence intervals, calibration workflows, and post-disturbance re-measurement triggers. Provide tiered monitoring pathways for smaller or lower-risk projects.

Are disturbance events appropriately accounted for?

QFF Position: *No.*

Rationale: Queensland producers regularly manage natural risks including fire, cyclone, flood, and drought. The draft provides insufficient guidance on how these events affect credit reversal, re-measurement, or discount recovery, increasing financial and operational risk.

Recommendation: Define registrable disturbance events. Include buffer protections against automatic reversals beyond the proponent's control. Establish post-disturbance re-measurement protocols and allow recovery of TYF or other discounts when sequestration is maintained or recovering.

Does the 40% Tree Yield Formula discount conservatively address sampling and calibration uncertainty?

QFF Position: No.

Rationale: The flat 40% discount is excessively punitive, assuming high uncertainty regardless of sampling rigor or measurement quality. Withholding credits until year 25 creates a "financial valley of death," forcing proponents to bear full MRV costs while receiving limited liquidity. Combined with attribution discounts, upfront returns can fall to ~33%, undermining commercial viability and the ability to finance required infrastructure.

Recommendation: Replace with a graduated, evidence-based discount schedule linked to actual Standard Error. Introduce earlier return pathways where measurement demonstrates sustained sequestration. The method should also allow scientifically robust models beyond FullCAM where they meet defined validation standards, supporting emerging remote sensing, LiDAR and AI-based biomass estimation technologies.

Do you foresee proponents switching sampling approaches between reporting periods? How should this be facilitated while maintaining integrity?

No comment.

Should the method allow projects to be credited based on direct biomass sampling (LiDAR, multi-phase sampling) without the Tree Yield Formula?

QFF Position: *Yes.*

Rationale: Restricting crediting to modelled approaches limits accuracy and prevents adoption of rapidly improving remote-sensing technologies. Direct measurement can provide more precise estimates and reduce uncertainty.

Recommendation: Permit direct biomass sampling where it meets defined quality assurance and independent validation standards. Publish clear acceptance criteria, validation protocols, and QA/QC requirements.

Could the method be improved by allowing other project activities to use the FullCAM-Measure Hybrid approach?

QFF Position: *Yes.*

Rationale: Restricting hybrid measurement to suppressed lands creates methodological inconsistency. Applying the approach across environmental plantings and regeneration on cleared land would improve confidence in carbon estimates, especially in lower-rainfall zones.

Recommendation: Enable FullCAM-Measure Hybrid optionally across all vegetation activities. Prioritise developing specific calibration protocols for environmental plantings where model efficiency is moderate.

Conclusion

It is essential that the IFLM method works for farmers in practice, not just in theory. Farmers make decisions based on practicality and viability, and they adopt approaches that genuinely help their businesses thrive. Key principles must guide the finalisation of the IFLM method:

1. Farmers bear the financial risk.
2. Land management must be resilient under real-world conditions.
3. Adoption occurs only when farmers see tangible results.
4. Environmental outcomes depend on farmer success.
5. Trust and credibility are fundamental.

Queensland farmers have waited years for an integrated methodology they can rely on. Ongoing uncertainty, shifting requirements, and complex administrative hurdles have tested patience and investment. The final IFLM method must be stable, practical, and demonstrably effective on the ground. Without consistent, workable results, confidence in the framework will erode, and no matter how scientifically rigorous, the scheme will fail to deliver its intended outcomes.

The method must support real-world decision-making, provide clear pathways for participation, and ensure that environmental and commercial benefits go hand in hand — only then will it achieve its potential.

Yours sincerely

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