



QUEENSLAND  
FARMERS'  
FEDERATION

# Independent Review Of Australian Carbon Credit Units

**Prepared by:**

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ACCU Review Secretariat at the Department of Climate Change, Energy, the Environment and Water

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The united voice of  
Queensland agriculture

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## Our members

- Canegrowers
- Cotton Australia
- Queensland Fruit & Vegetable Growers
- Nursery & Garden Industry Queensland
- eastAUSmilk
- Australian Cane Farmers Association
- Queensland United Egg Producers
- Turf Queensland
- Queensland Chicken Meat Council
- Pork Queensland
- 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
- Queensland Oyster Growers Association
- Lockyer Water Users Forum



# About the Queensland Farmers' Federation



## **The Queensland Farmers' Federation (QFF) is the united voice of agriculture in Queensland.**

We are a member-based organisation representing the interests of peak agriculture industry organisations, both state and national. Through our members QFF represents more than 13,000 primary producers across the cotton, sugarcane, horticulture, dairy, nursery and garden, poultry, eggs, pork, and intensive animal industries.

We unite the sector to engage in a broad range of economic, social, environmental, and regional issues through advocacy, policy development, and project activity. We work with the government of the day on behalf of industry, farmers, and the community to provide powerful representation and contribution to the policy direction, sustainability, and future growth of Queensland's agriculture sector.

Our Council of member representatives and policy committees set the strategic priorities for policy development and advocacy, while our Executive Board ensures our corporate governance.

QFF draws on the expertise and industry knowledge of our members and through our commitment to collaboration and considered policy development, we lead Queensland's agriculture sector towards a strong future, ensuring our members are ahead of the game and have a voice at the table on the issues that matter to their members.

## **Submission**

QFF welcomes the opportunity to provide comment on the Independent Review of Australian Carbon Credit Units.

We provide this submission without prejudice to any additional submission from our members or individual farmers.

## **Background**

The Australian Carbon Credit Unit (ACCU) scheme, since its inception, has continued to evolve, reflecting the reality that ongoing improvements are essential to achieve its intended impact of reduced national emissions. This national market operates in alignment with the objectives of the Paris Agreement and other international accords, aiming to regulate and reduce CO<sub>2</sub> emissions. Despite being in-place for over 10 years, the scheme still struggles to garner widespread participation to aid in effectively contributing to Australia's climate goals. QFF welcomes the Independent Review and recognising the need for reviewed principles, enhanced incentives, outreach efforts, and policy adjustments, QFF has provided the below responses and recommendations.

## **Integrity**

QFF supports Recommendation 6 to maintain Offsets Integrity Standards (OIS) and that these be clearly defined through supporting principles. QFF sees this as a vital aspect in bolstering confidence

in the ACCU scheme and the success of the carbon market long-term. Integrity of the scheme as a whole is the paramount factor in ensuring both national and international trust in Australia's carbon abatement framework and moving away from the 'greenwashing' label that ACCU projects can attract.

### Scheme Methodologies

QFF acknowledges the crucial role the Integrity Committee plays in maintaining method integrity, however advocates for the inclusion of additional experts in this Committee who possess practical experience in the field for which these policies are being implemented i.e., agricultural producers, allowing for a skills-based governance. This is particularly important for development of new carbon abatement methodologies, their technical integrity and feasibility. QFF stresses the importance of avoiding future method revocation in the scheme, as with more robust method investigations and more robust datasets to support the implementation of new methodologies, this should not happen. Revocation of methodologies will only decrease confidence in the scheme and work to push away landholders from investing their time and money into ACCU projects. The revocation of these methodologies is highly impactful to landholders that have undertaken projects using these methods in good faith that the integrity of the methods has been thoroughly investigated and proven. It is important that those landholders who do invest in a carbon abatement methodology which in the future is revoked, are compensated for their investment into aiding Australia's emission reduction.

This is not to say that existing methodologies should not be reviewed frequently, in line with international best practice, to ensure they continue to be a reliable sequester of carbon inside of scheme provisions. QFF supports the adjustment to the Act which allows for a proponent-led method development overview, which will allow on-ground stakeholders (i.e., land managers and farmers) to be in charge of projects which may impact their own farms.

QFF also support the modular approach, as proposed in section 2.3.3 Developing Modules. Modules will ensure flexible and timely adaption of new technologies, consideration of regional and climatic differences etc, without the often lengthy, costly and time consuming process of developing a new methodology. This will help accommodate farmers and landholders who need minor adjustments from existing methodologies to develop and implement a viable ACCU project. QFF believe it will result in more flexibility in the ACCU scheme and consequently broader participation and increased abatement.

### Data and Modelling

With the continually developing technological landscape, it is vital that these policies reflect the ever-changing nature of data collection, transformation and management. The principle of transparency is especially important in regards to modelling – in particular those methodologies which rely on models such as FULLCAM or LOOC-C to prove carbon abatement. QFF agrees with recent stakeholder feedback that FULLCAM needs to be adaptive to include forward-thinking modelling in the changing global climate. Section 2.3 of the Review states that this model is updated and maintained by the government, however if this is the case there is additional transparency needed as to how this is occurring, what data is being used to update the model and how this is collected. This would be in line with transparency principle and Recommendation 4 and 5, regarding provisions in transparency for data access and sharing.

Whilst QFF supports the principles around transparency, it also raises concern around the suggested publication of location of projects under the CER. Published location should be kept to general Local Government Area (LGA) under section 1.2.4 (when information should be withheld). This is

particularly pertinent to farming properties and their landholders, as the recent increase in animal and climate activism poses a real threat to agricultural producer's safety and livelihoods.

## Project provisions

Additionality as a provision within the CFI Act has garnered mixed sentiments among stakeholders. Some stakeholders argue that the current additionality criteria are too stringent and act as a deterrent for potential participants, hindering the scheme's overall effectiveness. QFF understands there is a balance between ensuring the guidelines are fair and that they encourage users to participate, as the success of the scheme and carbon market is reliant on this. Additionality as a provision is a difficult area to navigate for agricultural producers, and as such the 'In lieu of newness' provision within the CFI Act is welcomed. QFF supports this amendment which will aid farmers who have been proactive in this space to participate and access the carbon market. Previous versions of the Act have not accounted for reach of knowledge to rural areas and how lack of scheme awareness in these remote areas hinders landholder participation despite many of them already implementing these carbon abatement methodologies on farm. Landholders already undertaking these sustainable practices should not be disadvantaged or excluded from the carbon market due to a failure of the government's outreach strategy. QFF moves that this provision should also include projects that were not registered under the IEFE method, on a case-by-case basis, to ensure inclusivity of rural and remote landholder.

## Permanence and resilience

The permanence obligation for ACCU projects ensures carbon remains sequestered for a long-term period (i.e., 25 or 100 years). QFF understands the importance of permanence periods in ensuring the overarching goal of CO<sub>2</sub> abatement is achieved and not re-emitted to the environment through disturbance events. QFF has previously expressed concern over a lack of guidelines regarding permanence periods and natural disturbance events, and how this may impact a project's already accredited units. Natural disturbance events which occur close to the end of the permanence period and several years unit on-sell, creates a high degree of liability for project holders. Currently project holders have to prove they have actively tried to put in measures to prevent 'reversal events' impacting project carbon storage. QFF suggests these proactive avoidance requirements be continually assessed in the coming years, to account for the increase in natural disturbance events and the compounding impact the frequency of these natural events will have on farming bodies. Natural disturbance and carbon sequestration mitigation should be in line with resilience frameworks outlined in the Queensland Regional Plans and local government planning.

Overall QFF advocates for further support for farmers in the ACCU scheme. The Federal Government needs to acknowledge the complexity of landholder outreach as well as its lack of improvement over the years. Without revision and improvement to these strategies, farmers are left vulnerable and without reliable sources of information.

Yours sincerely

Jo Sheppard  
Chief Executive Officer



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

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