19 April 2025

ACCU Secretariat

Emissions Reduction Division | Carbon Crediting Branch | Emissions Reduction Assurance Committee Secretariat

Department of Climate Change, Energy, the Environment and Water

By email

Dear ACCU Secretariat,

**RE: CMI IFLM Taskforce Technical Working Group's feedback in response to ERAC's periodic review of the *2021 Soil Carbon Method***

The intention of our submission is to support a process of continual improvement to the Carbon Credits *(Carbon Farming Initiative – Estimation of Soil Organic Carbon Sequestration using Measurement and Models) Methodology Determination 2021* ('the Soil Carbon Method') based on high integrity principles, science and evidence-based decision-making and industry experience.

Stability of the carbon sector is paramount to encourage critical investment in land management practice changes and uptake of carbon farming projects at the scale required to tackle climate change. We ask for comprehensive testing and consultation of any proposed changes to the method, and stability where changes do not advance policy objectives.

The Soil Carbon Method will become an important component as a module of the IFLM Method, where for the first time, land managers will be able to claim abatement for sequestration in both trees and soil on the same land. The ability to build carbon in both trees and soil at the same time is aligned with Australia's climate mitigation, adaptation and food security objectives, and with the reality of how land is managed on the ground.

The CMI IFLM Taskforce – Soil Carbon TWG convened a meeting with CMI member Carbon Service Providers who use the Soil Carbon Method. The discussion highlighted:

- Diverse views on some topics identified by ERAC, specifically the temporary discount and strategies to account for climate and season impacts on changes in soil carbon, and whether new measurement technologies should be eligible in Schedule 1 of the Method;

- The need for the IFLM Taskforce to respect that different companies have divergent views and noting these service providers contributed their own submissions direct to DCCEEW and ERAC the majority of which will be made public;
- Strong support for method continuity with minimal changes. If there was a strong case for changing the temporary discount or introducing a new upper limit, some within the group were supportive of a Net Primary Productivity-aligned cap, which would ensure conservativeness while supporting continued method uptake. The group requested specific consultation prior to implementing such a change; and

- Given the divergent views, this submission aims to highlight areas of agreement and organisations have made independent submissions to ERAC that detail their specific views, including where there are any points of divergence.

In regards to the proposed IFLM Method, there was agreement between the IFLM TWG that:

- The Soil Carbon Method remains sound and continues to meet the Offsets Integrity Standards,

- The Method should not be suspended. Neither while submissions are considered, nor subsequently while changes are tested and consulted.

- The IFLM method should mirror the requirements of the standalone soil carbon method. An IFLM soil module should not replace the standalone Soil Carbon Method, but provide an integrated option.

- The Method should avoid requirements for a paired control sites, due to the difficulty of obtaining analogous sites, concurrently managing the areas differently for the duration of the crediting period; as well as the potential for gaming.

- There is a need for collaboration between scientists working within carbon service providers and scientists working in academic institutions or other organisations to ensure continual improvement and integrity of the Method. In particular, Schedule 2 of the Soil Carbon Method provides a great opportunity for cross-collaboration among scientists and other practitioners to advance the science

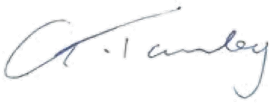
- The soil carbon sector is interested to share its data to advance national soil science research objectives. However, this needs to be done in a way that protects IP and privacy of project proponents and farmers. One way to achieve this aim is to establish a national environmental data sharing platform.

- In the short term, it is challenging to definitively attribute changes in soil organic carbon due to any one factor or driver, including climate and practice changes. There are concerns around the influence of climate- and season-driven changes in soil carbon and need for ongoing consideration of addressing these, for example through a land management strategy. However, in the longer term, management is a key driver of soil carbon sequestration.

The IFLM Taskforce – TWG is happy to contribute to further discussions as part of this review.

Yours sincerely,

Skye Glenday
Co-CEO, Climate Friendly
IFLM Taskforce Co-Chair



Adam Townley
CEO, Australian Integrated Carbon
IFLM Taskforce Co-Chair

## About the IFLM Taskforce

In 2021, the Carbon Market Institute (CMI) formed the Integrated Farm and Land Management method Taskforce (IFLM Taskforce). The IFLM Taskforce is made up of a broad cross-section of CMI members and stakeholders that are committed to a high-integrity, fit-for-purpose carbon market in Australia.

Since its creation, the IFLM Taskforce has sought to develop and provide technical advice to the Australian Government on the creation of an IFLM method for the Australian Carbon Credit Unit Scheme (ACCU Scheme), including as part of the initial method prioritisation process.

The IFLM Taskforce also wants to see widespread consultation and clear development timelines in a way that ensures adequate public consultation and expert input from a wide range of experts and stakeholders.

*The views of the IFLM Taskforce do not necessarily represent the views of CMI, nor any individual CMI member.*