Briefing Note

IFLM: Aligning with the Offsets Integrity Standards and the Impact of Grazing

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Introduction: Context setting for a robust IFLM method

The Integrated Farm and Land Management (IFLM) method will be the first method under the Australian Carbon Credit Unit (ACCU) Scheme to deploy a "modular" framework, thus allowing multiple carbon project activities to be undertaken on a single parcel of land, and registered under a single project. However, for the IFLM method to be truly impactful, it must have a comprehensive scope of eligible land management activities including grazing management, with specific safeguards in place to ensure that outcomes are tied to project activities that would not have occurred otherwise.

This briefing note is focused on the proposed inclusion of regeneration activities enabled by grazing management practice changes and outlines proposed mechanisms to ensure that these aspects of the forthcoming IFLM Method are aligned with each Offsets Integrity Standards (OIS) criterion. The briefing note also provides further scientific and evidence-based context on the impact of unmanaged grazing on vegetation growth.

IFLM, Rangelands and Rainfall

Semi-arid rangeland ecosystems make up around 80% of Australia's landmass,[1] and represent a substantial opportunity for new ACCU Scheme projects under a comprehensive IFLM method. The inclusion of regeneration activities should not be premised on a false binary between "cleared" and "uncleared" lands, but based on more comprehensive science-based eligibility criteria.

A false binary risks excluding substantial swathes of Australian rangelands that were historically cleared or otherwise degraded as a condition of pastoral land grants that occurred periodically post European settlement. The settlement of Australia also disrupted long run Aboriginal land management practices, which has caused other critical impacts on Australia's rangelands. Degradation in the rangelands often occurred post-settlement and pre-satellite technology being readily available (i.e. pre-NASA's Landsat available since ~1988). This means that most satellite imagery shows vegetation and soil that was already in a modified, low-carbon condition. Much of this historical degradation was driven by the introduction of sustained over-grazing, often required by pastoral lease grants across Australia, and recorded in historical stock records. The IFLM method should account for this historical degradation. This requires careful consideration of the land condition of a site - including the historic impacts of a grazing regime on land condition - and the site's potential to store carbon.

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[1] Department of Climate Change, Energy, the Environment and Water, "Introduction to Australia's Rangelands," last updated October 3rd 2021: https://www.dcceew.gov.au/environment/land/rangelands.

There is also no dispute that rainfall is a key precondition for woody biomass growth in the rangelands. *Rain is essential, but not a sufficient condition* to drive sustained increases in woody biomass growth in the rangelands, and indeed across all lands. Section 1, below, outlines carefully considered, science-based criteria to support attribution of land management practice changes to increases in woody biomass carbon stocks, including requiring long run stable low or declining carbon stocks in the pre-project period, for projects where cessation of clearing is not a proposed project land management practice change.

Project Transition Opportunities

A comprehensive IFLM method may allow some existing ACCU Scheme projects – including those registered under the human-induced regeneration method, soil carbon method and environmental plantings method – to transition to the IFLM method and undertake additional carbon management practice changes. It is indeed central to the overall goal of IFLM to incentivise expanded adoption of new and additional carbon management activities by land managers, including uptake of multiple activities where relevant to their property context instead of single practices changes. The project transition mechanism should be focused on incentivising additional carbon management activities to be undertaken, building and expanding on past actions. This necessarily requires compliance with additionality requirements. Transition should be a) voluntary, b) have new eligibility criteria, c) require accurate carbon estimation. All audit and consent requirements would have to be met for existing projects to successfully transition.

This is the decade that matters for climate action, and a comprehensive IFLM method will play a key role in delivering on the Australian Government's climate targets.

Section 1: Ensuring that the IFLM method aligns with the Offsets Integrity Standards

The Offsets Integrity Standards (OIS) are a key tool in the Australian Carbon Credit Unit (ACCU) Scheme to ensure that outcomes from projects contribute genuine abatement of greenhouse gases. It is important to understand that the framework for considering the methods against the OIS also requires specific policy interpretation:

> *"In interpreting the offsets integrity standards, the Committee's general approach is to consider whether there is sufficient incentive to prompt participation and the uptake of relevant abatement activities that would not otherwise occur."* [2]

This section of the brief considers grazing management in the IFLM method through the lens of each Standard, and highlights mechanisms to alleviate concerns regarding the inclusion of this activity.

A. Additionality

The additionality principle seeks to ensure that carbon credits are only awarded projects where the carbon abatement occurred because of the project activity and would not have occurred otherwise.

The most robust possible approach to determine whether a project diverges from a baseline scenario (i.e. a 'without project' scenario) is to implement a rigorous and well considered "control and impact" experimental design, with ecologically paired sites implementing the project activity and business as usual management, respectively. However, developing robust control sites in Australia's variable rangelands is practically and regulatorily intractable. Macintosh et. al.[3] attempted to substitute buffer areas around a project as a proxy for controls and drew the conclusion that they were unable to distinguish differences between the project and control areas. Moore et al.[4] provide a comprehensive review of the problems with this experimental design, primarily that using buffer areas as controls did not (could not) enforce business as usual management and could not be assumed to be ecologically comparable.

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[2] Emissions Reduction Assurance Committee Information Paper: Committee considerations for interpreting the Emissions Reduction Fund's offsets integrity standards Version 2.0 March 2021.
[3] Macintosh, Andrew, et al. (2024) "Australian human-induced native forest regeneration carbon offset projects have limited impact on changes in woody vegetation cover and carbon removals. *Communications Earth & Environment*.
[4] Moore, et al. (2025). National-scale datasets systematically underestimate vegetation recovery in Australian carbon farming projects. *In press*. https://doi.org/10.32942/X2CW5W.

This is not a new problem, and the Offsets Integrity Standards are designed to accommodate it.[2] Where control sites are not feasible, the IFLM Taskforce proposes that a rigorous "weight of evidence" approach is used to establish additionality. This involves building an auditable case based on several lines of evidence:

1. **Demonstration of baseline:** Managed regeneration projects must demonstrate that ecosystems were in a stable average or declining low-carbon state over a long-term baseline period (e.g. minimum 10-15 years, but potentially longer as appropriate for the growth characteristics of the ecosystem). This establishes that the land was not already recovering on its own and provides a credible baseline against which to measure future change.
2. **Ecosystem benchmark and gap analysis:** The project must then demonstrate its potential for recovery. This is done by comparing the condition of the project area to scientifically validated descriptions of reference ecosystems.[5] If the comparison between project and reference ecosystems identifies a significant "gap" in carbon stocks, it provides strong evidence that a change in management can deliver additional carbon sequestration.
3. **Land Management Strategy:** Upon registration, the project must provide a Land Management Strategy that demonstrates a clear theory of change and explains how its specific activities will remove the historical barriers that created the suppressed baseline, thereby closing the identified gap.

There has been debate around the role that rainfall plays in promoting vegetation growth, with a body of work arguing that rainfall is the most significant driver of woody biomass in Australian rangelands. This implies that changes in vegetation as a result of project activities – such as shifts in grazing management, or removal of feral animals – are not additional. However, this argument ignores what happens *after* it rains. While rainfall is necessary to trigger a regeneration event, subsequent grazing, fire, and competition determine the survival of that new growth and the accumulation of carbon over time. Rainfall can initiate an increase in carbon stocks, but if other factors are left unmanaged, that increase may not persist.

The critical question for a high-integrity method is not if grazing has an impact, but where and why it has a material impact on woody vegetation. The variability in grazing impacts shown in recent studies, such as the Forrester et al. meta-analysis,[6] confirms why a simple, one-size-fits-all approach is inappropriate. The proposed framework is

[5] Where no appropriate reference ecosystem description exists, a project may establish benchmarks using reference sites that are ecologically similar but have not been subject to the same historical management pressures. Selecting reference ecosystems to demonstrate potential for recovery is common in restoration ecology and is already recognized in related legislation, such as the Nature Repair (Replanting Native Forest and Woodland Ecosystems) Methodology Determination 2025.
[6] Forrester, et al. (2025). Does grazing exclusion in Australia's rangelands affect biomass and debris carbon stocks?. *The Rangeland Journal*, 47(3).

not a broad-stroke assumption that changing grazing management will work in all scenarios, but rather a diagnostic tool to ascertain where, when and why grazing management is likely to have a material impact on carbon stocks. The method requires each project to build a specific, evidence-based case demonstrating that its land is in a suppressed condition precisely because of historical grazing pressure. This process acts as a rigorous filter, deliberately selecting for areas with a high likelihood of a positive response while screening out unsuitable land, ensuring projects are targeted only to eligible areas where the link between management, land condition, and carbon potential is clear.

This weight-of-evidence approach meets this integrity standard by constructing an auditable and scientifically defensible case for additionality:

- A long-term baseline provides a counterfactual scenario including both ecological and historical management data, such as grazing records, demonstrating that the project activities are not business as usual and require a land management practice change). The baseline also proves that rainfall alone was not enough to improve the land's condition.
- Use of reference sites prove that under different management the land has the potential to store more carbon.
- A Land Management Strategy provides the causal mechanism for realising that potential.

Together, these three lines of evidence build a clear and convincing case that credits are only awarded for additional outcomes, moving beyond the simplistic debate over whether rainfall or grazing is more important. **Natural climate and weather cycles can trigger the change, but land management interventions are required to transform a temporary greening event into long-term sequestration of carbon.**

B. Measurement

A comprehensive IFLM method can meet the "measurable and verifiable" standard by providing a flexible, standards-driven framework that leverages the best available science, from robust models to direct measurement. Sequestration resulting from active management activities (including grazing management) can be measured and verified through either a model – such as FullCAM – direct measurement, or a hybrid approach.

To meet the OIS, the status quo for applying FullCAM requires that it only be used where its core assumptions are valid, i.e. on even-aged regenerating, non-forest areas. Within this domain, independent verification by CSIRO has repeatedly found the model to be unbiased and fit-for-purpose. Gateway checks of regrowth, and the attainment of forest cover provide direct and verifiable indicators that the real-world trajectory is consistent with FullCAM's predictions. If an area fails a gateway, crediting is paused or reversed. The use of FullCAM is therefore both measurable regarding its inputs and verifiable in its outcomes.

However, the IFLM method should offer more than a single national model. Direct measurement of carbon stocks provides significant advantages. It allows for the use of newer, more sophisticated models that can better account for landscape heterogeneity. This would in turn enable more flexible and integrated land management, such as projects that include ecological thinning or landscape rehydration, which cannot currently be accommodated by FullCAM.

Assertions that direct measurement is impractical are outdated: the carbon industry already uses a combination of LiDAR, high-resolution imagery, and targeted field surveys to directly and accurately quantify changes in woody vegetation. These practices, alongside other technology, protocols and internationally recognised best practices exist to quantify carbon stocks in woody biomass.[7] Project proponents may find investment in such approaches advantageous where they believe a national model underestimates their abatement, where they wish to use innovative activities, or where robust measurement can reduce uncertainty and command market premiums. Direct measurement of the three-dimensional forest structure is commonplace and can provide verifiable evidence of carbon stock change.

A comprehensive IFLM method should meet the OIS by offering a choice of pathways, each with clear rules for measurement and verification. A project might use a validated national model like FullCAM, provided it adheres strictly to the application guidelines, or locally calibrated models that are validated with measurement. Precedents exist in other ACCU methods to accommodate a range of approaches by linking accuracy to risk.[8] A project that invests in a locally calibrated and validated model, could face a smaller risk-adjustment buffer and undertake periodic "true-ups" to ensure that crediting is always anchored to verified measurement of on-ground outcomes.

Given the rate of change of technologies and their applications, the IFLM method should be technology-agnostic, but standards-driven. The method should define the required level of precision; it is then up to ERAC to confirm its consistency with the OIS, and the project proponent to select the appropriate approach to meet it. Once a project is registered, the Clean Energy Regulator will ensure that projects are compliant with the requirements of the method.

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[7] Duncanson et al. (2021) Aboveground Woody Biomass Product Validation Good Practices Protocol. Version 1.0. Land Product Validation Subgroup (WGCV/CEOS). doi:10.5067/doc/ceoswgcv/lpv/agb.001
[8] Carbon Credits (Carbon Farming Initiative – Estimation of Soil Organic Carbon Sequestration using Measurement and Models) Methodology Determination 2021,

C. Eligible abatement

The "eligible abatement" standard requires that abatement is from sources and sinks that can be used to meet Australia's international climate targets. As the ERAC has clarified,[9] this standard does not require that the abatement from a specific project is individually tracked in the National Inventory Report. Rather, it requires that the type of abatement—in this case, carbon sequestered in woody vegetation—comes from sources and sinks that are accounted for in Australia's national carbon accounting system, which deploys a specific set of definitions to classify abatement. Conflation between ecological descriptions such as "woodland" and these formal definitions causes confusion over eligibility of abatement. The OIS are not concerned with ecological labels, rather the specific criteria outlined here. Carbon stored in Australia's forests and woodlands is comprehensively accounted for using these formal definitions in our national inventory submitted under the Paris Agreement.

Therefore, any project that meets the rigorous tests for additionality and measurement is delivering eligible abatement. With appropriate high-integrity estimation methods, increases in carbon stocks within any woody vegetation—whether it's making a sparse woodland denser or a degraded forest healthier—could be eligible, provided the project has met the entry criteria, which have been determined in relation to the OIS.

By designing a method with robust, evidence-based frameworks for additionality and measurement, a high integrity method will ensure every unit of abatement is real, additional, and consequently, fully capable of being used to meet Australia's national targets.

D. Clear and convincing evidence

The OIS require robust support for the method's impact, its exclusion of non-additional activities, and its approach to measurement. As interpreted by the ERAC, meeting this standard involves a careful consideration of all available information, including peer-reviewed literature, industry and government publications, and expert feedback. The Taskforce proposes a generally flexible approach to activities within a Land Management Strategy, provided they meet robust criteria and have multiple reinforcing lines of evidence in line with a clear set of guidelines.

Methods must include a robust filter against non-additional projects, part of which should be through the "weight of evidence" framework for additionality, outlined under A) Additionality. Evidence required should include demonstration of a suppressed

[9] "The Committee does not believe the eligible carbon abatement standard requires the National Inventory Report to account for the relevant emissions or removals covered by the method. All that is required is that the abatement must be capable of being used to meet Australia's mitigation targets under the Kyoto Protocol and Paris Agreement."

baseline, identification of the specific management barrier responsible, and demonstration of the potential for recovery. These criteria comprehensively exclude projects that may not generate additional abatement, restricting eligible areas to only those that demonstrate a clear likelihood of positively responding to management activities enabled by the project.

The robustness of measurement and verification is enhanced through strong guidelines, independent audits and multiple tiers of supporting evidence. Independent reviews of the ACCU scheme have found that the system is working as intended and that there are significant mechanisms[10] for verification of project and scheme level performance.[11]

E. Project emissions

The OIS requires a method to provide for a deduction of any material emissions that are a direct consequence of carrying out the project. This includes both on-site emissions and off-site leakage.

This can be managed through a clear, auditable process such as the mandatory leakage assessment (Appendix) proposed during IFLM development. The proposed leakage assessment requires projects to assess the risk of activity emissions displacement, and where the risk is material, to implement monitoring and accounting for those off-site emissions. Projects should also identify and quantify any material increases in greenhouse gas emissions resulting from the new management activities. This could include, for example, emissions from increased use of vehicles for property management or changes in fire regimes. These emissions would be calculated using established factors from the National Greenhouse Gas Inventory and deducted from the total carbon sequestered to determine the net abatement.

F. Conservatism

The OIS require that all estimates, projections, and assumptions (including counterfactuals) be conservative to avoid over-crediting.

Counterfactuals cannot be proven or disproven and, instead, require a judgement of whether they are reasonable. The role of the conservatism standard, therefore, is not to demand absolute certainty, but to ensure that wherever uncertainty exists, the method

[10] https://cer.gov.au/document_page/independent-review-gateway-checks-december-2024
[11] https://cer.gov.au/document/human-induced-regeneration-method-managing-project-risk-to-deliver-carbon-abatement-australia

is designed to err on the side of caution. A high-integrity method framework achieves this through a multi-layered approach that embeds conservatism at every stage:

- The "weight of evidence" approach is inherently conservative by limiting eligibility for managed regeneration to ecosystems with long-term evidence of a suppressed baseline to establish a reasonable and robust counterfactual that the land would likely persist in that state. This is conservative and does not assume that all land has the potential to regenerate.
- Carbon stock estimation contains uncertainty and a conservative approach outlined in the IFLM method development[12] process manages this by applying discounts or buffers proportionately. This ensures the risk of uncertainty is borne by the project, not the atmosphere.
- Abatement is issued for verified results (not forecast results), and gateways and permanence provisions provide mechanisms to manage performance risk over time. If a project fails to meet its regeneration gateways, or if a natural disturbance event occurs, crediting is paused. Abatement must either “catch up" or any reversals must be fully accounted for by a true up mechanism before further credits are issued. This is designed to ensure that credits are only issued for verified, long-term outcomes.

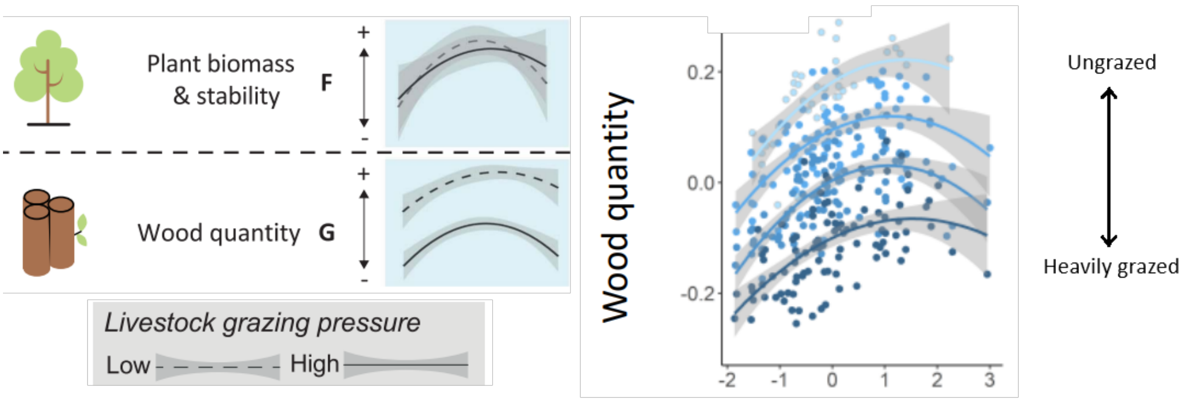
Conservativeness must also apply to any future project transition arrangements. The goal of any transition is to incentivise new and additional abatement, building upon and expanding past actions. Therefore, any transition would necessarily be voluntary and subject to a conservative design, requiring projects to meet the new, more stringent eligibility criteria and undergo accurate carbon stock measurement. This ensures that any new crediting is tied directly to new actions and verified outcomes, upholding the integrity of the scheme.

[12] https://carbonmarketinstitute.org/app/uploads/2025/07/Discussion-Paper_IFLM-Measurement-modelling-schedules.pdf

Section 2: General effects of pastoralism and grazing, and their inclusion within the IFLM Method

A global study of dryland ecosystems published in Science,[13] including several sites in Australia, found that the effects of grazing on rangelands ecosystem services are context dependent. The study used a standardised protocol repeated at 98 sites across 25 countries to isolate the effects of grazing from other environmental factors. This globally replicated design offers a gold standard for untangling complex interactions. This finding that effects of grazing on wood quantity are context dependent challenges universal claims about the impact of grazing and suggests a more nuanced application of ecological principle is required.

The research is particularly relevant for Australian rangelands, characterised as warmer drylands with high rainfall seasonality. In these specific environments, the study provides clear evidence that increasing grazing pressure has a strong negative effect on woody biomass.



Moreover, this study found that grazing pressure did not have a consistent effect on vegetation greenness as measured using Normalised Difference Vegetation Index (NDVI), a satellite-based measure often used as a proxy for total plant biomass and its stability over time. This is likely because remotely sensed proxies of photosynthetic leaf material struggle to distinguish between the ephemeral greening of grasses after rain and the establishment of the woody vegetation that sequesters carbon over the long term. This challenge is known to frustrate woody vegetation mapping in drylands and is well understood.

This limitation of coarse satellite data is a central flaw in purely remote assessments of grazing impacts on woody vegetation. A critique by Moore et al.[4] demonstrates that the national datasets used by Macintosh et al.[3] are not fit-for-purpose: the substitution of

[13] Maestre, Fernando T., et al. Grazing and ecosystem service delivery in global drylands. *Science* 378.6622 (2022): 915-920.

photosynthetic signals between grass and leaves means that coarse resolution satellite imagery cannot identify grazing impacts. The datasets have an omission error rate of >80% for regenerating vegetation, leading to incorrect conclusions that regeneration is not occurring and that grazing management has no effect on woody carbon stocks.[4] Practically, this is addressed through strong regulatory guidelines. **Following the 2019 ERAC review of the HIR method, the Clean Energy Regulator requires project specific data, with high levels of accuracy, to validate that woody vegetation has been correctly mapped. The Taskforce proposes that IFLM similarly rely on project specific evidence to assess project eligibility and on-ground outcomes.**

Australian-specific drivers of grazing impacts

There is substantial evidence that grazing impacts the recruitment, growth and survival of arid and semi-arid trees species, which have demographic processes spanning multiple wet/dry cycles.

Sustained pressure on woody vegetation has two critical impacts: it prevents the survival and growth of new cohorts of trees and shrubs, while also contributing to the gradual loss of mature trees through senescence - gradual deterioration of function and characteristics over time. Over decades, this results in systematic changes to vegetation structure, particularly the loss of mid-sized trees, which indicates failed natural recruitment.

In Australia's variable rangelands, degradation is often driven by a recurring sequence of climatic and economic events.[14,15] During periods of favourable rainfall and good market prices, pastoral practices typically expand with increased stocking rates in business-as-usual scenarios. This sets the stage for a rapid collapse when conditions change. When a major drought inevitably occurs, forage production plummets. This is frequently coupled with a fall in commodity prices, making it financially unattractive for pastoralists to sell their stock. This delay in destocking results in extreme grazing pressure on a stressed environment, causing the loss of palatable perennial plants, soil erosion, and a long-term reduction in the land's productivity.

This cycle is exacerbated by fundamental economic and ecological challenges. The financial reality of pastoralism often incentivises prioritising short-term economic returns and discounting the impacts to long-term ecological health. Furthermore, the timeframes of key climatic cycles can be longer than a manager's working life, making it

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[14] Moore, et al. (2025). National-scale datasets systematically underestimate vegetation recovery in Australian carbon farming projects. *In press.* https://doi.org/10.32942/X2CW5W.
[14] Stafford-Smith et al (2000). Towards sustainable pastoralism in Australia's rangelands. *Australian Journal of Environmental Management*, 7(4), 190-203.
[15] Stafford-Smith et al. (2007). Learning from episodes of degradation and recovery in variable Australian rangelands. *Proceedings of the National Academy of Sciences*, 104(52), 20690-20695.

difficult to learn from experience. These factors mean that management mistakes are inevitable.

The impact of grazing is often a key driver of landscape degradation, however the potential outcomes are context specific.[16] In resilient ecosystems, the land can recover, but in less resilient ones, the combination of high environmental variability and powerful short-term economic pressures can push the landscape across an irreversible threshold into a permanently degraded state.

Challenges in demarcating and excluding 'uncleared lands'

Early land grants and subsequent tenure systems often came with conditions requiring "improvements" for landholders to secure their title. In practice, these improvement conditions frequently mandated the clearing of native vegetation for cultivation or pasture, making land clearing a legal obligation of tenure rather than simply an agricultural choice. This was reinforced by government policies and financial incentives that encouraged the "development" of land, particularly through the destruction of timber and scrub.[17, 18]

Significant historical clearing in rangeland regions such as the Mulga Lands was not solely for broadacre conversion but also for the establishment of essential pastoral infrastructure. The construction of fences, 'beef roads', burning and ring barking[19] for pasture improvement required the felling of immense numbers of trees[20]. This widespread, diffuse form of clearing resulted in a substantial but incremental loss of woody vegetation that is not easily detected as a single large-scale event by remote sensing.

Modern remote sensing products like the Statewide Landcover and Trees Study (SLATS), which are largely based on Landsat satellite data, operate from 1988 onwards. They are therefore blind to the cumulative effects of clearing and land degradation that occurred prior to the satellite era, effectively ignoring the preceding 150 years of pastoralism. Satellites are good at seeing bulldozers push over large tracts of mature woody

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[16] Lunt, et al. (2007). A framework to predict the effects of livestock grazing and grazing exclusion on conservation values in natural ecosystems in Australia. *Australian Journal of Botany,* 55(4), 401-415.
[17] Christensen, S., O'Connor, P., Duncan, W., & Ashcroft, R. (2008). Early land grants and reservations: Any lessons from the Queensland experience for the sustainability challenge to land ownership. *James Cook University Law Review*, 15, 42-66.
[18] Australian Greenhouse Office. (2000). Land Clearing: A Social History. *National Carbon Accounting System Technical Report No. 4*.
[19] Oxley, R. E. (1987). Analysis of historical records of a grazing property in south-western Queensland. 2. Vegetation changes. *The Rangeland Journal*, *9*(1), 30-38.
[20] Pickard, J. (1994). Do old survey plans help us discover what happened to western New South Wales when Europeans arrived? In D. Lunney, S. Hand, P. Reed, & D. Butcher (Eds.), *Future of the Fauna of Western New South Wales* (pp. 65-73). Royal Zoological Society of NSW.

vegetation, but poor at detecting clearing sparse regrowth or the slow degradation from sustained grazing pressure. **The category of 'uncleared' therefore reflects satellite land classification but is not an accurate reflection of land condition, often mistaking a historically modified, suppressed landscape for a stable, natural one.**

Adopting a coarse binary threshold would lead to perverse and damaging policy outcomes. Firstly, it would lock out the one of the largest opportunities for landscape-scale carbon sequestration in Australia.[21] Secondly, it would create profound inequity. If eligibility is tied to a binary land classification, the IFLM method risks systematically excluding entire regions and land management histories, disproportionately disadvantaging states and tenures with older pastoral legacies – which often coincide with the Indigenous estate. A more inclusive and robust eligibility framework can instead assess land condition on a weight-of-evidence basis to determine if historical human management has created a suppressed, low-carbon state.

Conclusion

A comprehensive IFLM method represents a unique opportunity for the ACCU Scheme. As a first modular method framework, this method can be expanded to include additional land management modules over time, enabling greater uptake of carbon farming projects on marginal parcels of land that may not have a viable project opportunity under existing single activity methods.

However, for the IFLM method to be nationally applicable, it must be comprehensive in its scope and avoid coarse binaries. This policy brief has outlined how important policy levers can be employed in the IFLM method to ensure that it is aligned with the OIS, while also ensuring nationally applicability and potential for widespread uptake across a range of different land tenures, including pastoral and Indigenous owned or managed lands.

[21] Fitch, P., Battaglia, M. & Lenton, A., (2022) Australia's carbon sequestration potential, pp. 41-44. Commonwealth Scientific and Industrial Research Organisation.

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A list of selected excerpts relating to grazing from Australian peer-reviewed literature is available upon request. To access, please email iflm@carbonmarketinstitute.org.

Appendix – Draft leakage assessment decision tree