Emissions Reduction Assurance Committee: Integrated Farm and Land Management Draft Method

submission

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Carbon Market Institute

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The Carbon Market Institute (**CMI**) is an independent, member-based institute that promotes the use of market-based solutions and supports best practice in decarbonisation to limit warming to 1.5ºC.

CMI's membership includes 140+ primary producers, carbon service providers, First Nations organisations, legal and financial institutions, technology firms and emissions-intensive companies in Australia and the Asia Pacific. The CMI Board updates CMI's Policy Positions annually, which draw on practical insights from—but are ultimately independent of—members.[1]

This submission has been informed by consultation with members – including CMI's Integrated Farm and Land Management Taskforce – but the views put forward are ultimately CMI's own.

Strategic outlook

CMI welcomes the release of the Exposure and Plain English drafts of the proposed Integrated Farm and Land Management (**IFLM**) method on 22 December 2025. This represents a critical milestone in the evolution of a framework, integrated method long advocated by industry to enable integrated, whole-of-property carbon management under the Australian Carbon Credit Unit (**ACCU**) Scheme

CMI has consistently supported the development of this method to enable crediting of multiple land-based abatement activities on a single property, first convening a Taskforce of its members (now **IFLM Taskforce**) in 2019. Since the method was formally prioritised by the Minister in 2021, CMI's membership has contributed substantial technical expertise, time and resourcing to its ongoing development. While the process has involved meaningful engagement at various stages, key milestones and timelines have not always been met and aspects of the current draft do not fully reflect the expectations established through earlier co-design processes. Considering important lessons learned from IFLM method development, we look forward to future method development processes that are genuinely collaborative, transparent and delivered in a timely and efficient manner.

The original intent of the framework method was always clear: to enable the addition of more activities over time through modules, streamline reporting and administrative requirements, and increase ACCU Scheme participation by land managers across diverse tenures and geographies. The vision was articulated in the *Blueprint for holistic approach to carbon farming: Active Landscape Management & Agricultural and Production* (**the Blueprint**), published by the IFLM Taskforce in August 2021 with input from a broad cross section of stakeholders.[2] Following publication of the Blueprint and prioritisation, the Clean Energy Regulator (**CER**)

[1] CMI 2024, 'CMI Policy Advocacy Positions', https://carbonmarketinstitute.org/app/uploads/2024/10/CMI-Policy-Advocacy-Positions-October-2024.pdf.
[2] IFLM Taskforce 2021, *Blueprint for holistic approach to carbon farming*: https://carbonmarketinstitute.org/app/uploads/2021/08/AL-MAP-Method-Blueprint_final.pdf

began to develop the method through a series of co-design workshops. CMI and the IFLM Taskforce engaged with this process, which culminated in targeted consultation on a first draft IFLM method in 2022.

The publication of the Blueprint was also intended to build on recommendations of the 2020 *Report of the Expert Panel examining additional sources of low cost abatement* (**King Review**), which was endorsed by the Government and identified that stacking multiple methods on a single property had the opportunity to streamline and greatly reduce project reporting and auditing costs.[3] The Blueprint proposed two foundational categories in phase 1 – vegetation and soil –with a menu of eligible activities sitting beneath. Proponents would be able to select combinations best suited to their land management objectives and property characteristics. Subsequent updates from DCCEEW in March 2025 reflected these categories of eligible activities, outlining a scope of managed regeneration and plantings of native forest, and improvements to soil carbon.[4]

CMI continued to engage constructively when the process shifted to the Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) in 2023, contributing resources and participating in meetings with DCCEEW, including through the Stakeholder Reference Groups (**SRG**) held throughout 2025. CMI and its Taskforce provided technical and operational input in good faith. The SRG process was intended to resolve complex design issues and ensure alignment with policy settings across jurisdictions. However, it remains unclear how this co-design process directly informed elements of the current draft.

This consultation occurs at a pivotal moment. A well-designed, flexible and investable IFLM method has the potential to deliver substantial land-sector sequestration and materially contribute to achievement of Australia's 2035 Nationally Determined Contribution (**NDC**). Modelling commissioned by CMI from CORE Markets suggests that, under a conservative central uptake scenario, a first-iteration IFLM method incorporating environmental plantings, soil carbon and native forest regeneration (cleared and suppressed lands) activities could deliver peak annual abatement of approximately 35 $MtCO_2$-e by 2048. If the method framework is appropriately structured, IFLM could contribute meaningfully to the abatement task modelled by Treasury to inform Australia's 2035 target, with the capacity to deliver around 21% of the abatement forecasted. This scale of opportunity underscores the importance of ensuring the method settings enable, rather than constrain, participation and investment.

The purpose of this consultation is to enable the Emissions Reduction Assurance Committee (**ERAC**) to assess the draft method against the Offset Integrity Standards (**OIS**) – which underpins integrity and confidence in the ACCU Scheme. CMI supports the centrality of high-integrity standards, but these should be calibrated carefully to ensure projects remain implementable in practice.. The current exposure draft meets the OIS benchmarks, however we are concerned that the draft method errs on the side of being overly restrictive and conservative, and that the management of risk, real or perceived, should be layered alongside and work in conjunction with Scheme integrity measures. The Carbon Farming Initiative Act (**CFI Act**) requires conservatism to apply to estimates, projections and assumptions. The exposure draft effectively renders the use of improved data infeasible and prevents proponents from using the full capability of the Full Carbon Accounting Model (**FullCAM**) system, delivering potential overly conservative project results. The layering of additional proposed structural discounts and restrictions on measurement pathways risks rendering the method commercially unviable, undermining its capacity to contribute to the fifth object of the Act — "to

[3] King et al. 2020, *Report of the Expert Panel examining additional sources of low cost abatement*, p. 52: https://www.dcceew.gov.au/sites/default/files/documents/expert-panel-report-examining-additional-sources-of-low-cost-abatement.pdf.

[4] DCCEEW 2025, *Australian Carbon Credit Unit Scheme: Integrated Farm and Land Management method development: March 2025 update*, p. 4: https://www.dcceew.gov.au/sites/default/files/documents/accu-integrated-farm-land-mgt-method-march-2025-update.pdf.

facilitate the achievement of Australia's greenhouse gas emissions reduction targets."[5] Striking the right balance between integrity, practicality and scalability is critical to achieving the Scheme's objectives.

In its current form, the proposed IFLM method drafts present several material technical and commercial barriers. CMI has heard from across its membership that these barriers are likely to limit project viability, reduce uptake and constrain national scalability. Whilst there are strong and workable components within the draft, targeted amendments are required to ensure the IFLM method can operate as originally intended: as a robust, modular and futureproof framework capable of unlocking landscape-scale abatement.

CMI's recommendations to the ERAC on the current exposure draft of the IFLM method are summarised below and elaborated in the body of this submission. CMI's approach has been to provide high-level policy feedback reflecting the breadth of our membership, with consultation question references noted throughout (in blue). For more detailed technical input, we refer to the separate submission prepared by the IFLM Taskforce.[6]

To support an IFLM method that is rigorous and scalable, enabling the land sector to efficiently mitigate emissions in line with Recommendation 6.9 of the King Review, CMI proposes the following amendments:

1. Broaden the scope to realise the IFLM method's national ambition

To maximise participation and scale land-sector abatement across Australia, a nationally credible IFLM framework method must accommodate the diversity of Australian land tenures (including mixed tenure applications and importantly Indigenous and conservation estates), land management objectives as well as potential activities.

As currently drafted, the method is confined to a narrow set of sequestration activities and associated land eligibility. Its likely uptake is concentrated in southern and eastern Australia—where most ACCU projects have historically been registered—despite significant abatement potential elsewhere.

Although modular and expandable in concept, the first version of the IFLM method does not yet deliver national, whole-of-landscape applicability. Even where certain activities are deliberately deferred, the framework should include enabling provisions to support their future inclusion of modules without structural constraint.

Indigenous estate and rangelands

A broadened scope would unlock significant opportunities across Indigenous-held lands and the semi-arid rangelands—regions often characterised by mixed Indigenous, pastoral and conservation tenure. Indigenous Australians hold recognised rights and interests across a substantial portion of Australia's land mass. Ensuring the method accommodates Indigenous land management practices and diverse vegetation systems would support economic self-determination and align with Closing the Gap objectives.

Inclusion of soil carbon

The absence of a soil module represents a material deviation from the original Blueprint, which included soil and vegetation activities in Phase 1. Accounting for soil and vegetation carbon pools together is foundational

[5] *Carbon Credits (Carbon Farming Initiative) Act 2011*, 3(6): https://www.legislation.gov.au/C2011A00101/latest/text.
[6] IFLM Taskforce 2026, Draft *Carbon Credits (Carbon Farming Initiative) (Integrated Farm and Land Management) Methodology Determination 2026* Consultation Submission: https://carbonmarketinstitute.org/app/uploads/2026/03/SUBMISSION_CMI-IFLM-Taskforce_Mar-2026_IFLM-Exposure-Draft-ERAC-Consultation.pdf.

to a genuine whole-of-landscape method, particularly as modelling undertaken by CORE Markets indicates that it is one of the largest stacked abatement opportunities under IFLM.

As the *Carbon Credits (Carbon Farming Initiative—Estimation of Soil Organic Carbon Sequestration Using Measurement and Models) Methodology Determination 2021* (**2021 Soil Method**) review is nearing completion, its prioritised revision and mirroring within IFLM is essential. If timing does not align with finalisation of the IFLM instrument, structural "hooks" should be embedded in the legislative framework to allow seamless inclusion of a soil module at a later date.

2. Ensure the architecture is flexible and futureproof

Beyond the operational exclusion of soil whilst the current method is under review, the IFLM method draft eligibility settings and equation architecture confine the method exclusively to sequestration and should be expanded to permit provision for avoidance activities and future potential carbon pools. The Methodology Determination should be generic rather than specifically naming, and thus restricting to, certain activities.

CMI recommends establishing a clear development pathway and indicative timeline for future modules, consistent with Recommendation 5 of the 2022 ACCU Review, which supported proponent-led module development. Provisions should be made for controlled and natural fire activities and potentially future inclusion of savanna fire management.

3. Streamline eligibility criteria and measurement schedules

A whole-of-landscape method should prioritise consistency to reduce administrative and reporting burden. The exposure draft applies different measurement approaches across modules and this fragmentation increases complexity for mixed-history properties and may introduce integrity risks where CEAs are structured to select more favourable pathways.

CMI recommends:

- Embedding a single set of eligibility criteria in the core instrument
- Using the Land Management Strategy (**LMS**) to specify property-level application
- Applying consistent measurement schedules across modules

4. Include all Blueprint measurement pathways across all modules

Harmonised measurement approaches across IFLM method activities and modules will improve project feasibility, stacking uptake and confidence of outputs. The exposure draft introduces a FullCAM-Hybrid measurement option but limits it to suppressed land and does not open up opportunities to apply this approach – or other field measurement calibrated approaches – to other activities. Furthermore, reliance on FullCAM as currently detailed in the FullCAM guidelines is unlikely to improve project outcomes and confidence. Moreover, the method does not create an impactful pathway for the incorporation of improved data and processes, in line with previous ERAC advice.

CMI recommends inclusion of three pathways across all modules:

1. National model (FullCAM) with regular true-up via field measurement (every 5 years);

2. Alternative locally calibrated models with validation protocols;
3. Direct field measurement.

A FullCAM-only option should remain available, but DCCEEW should refine guidelines to ensure that appropriate models and sub models are applied, ensuring confidence in project outcomes.

5. Establish enabling processes now to support uptake

Parallel policy development is needed to ensure the method is practical upon release.

i. Transition arrangements

- Transition should remain voluntary.
- Consider time-limited new crediting periods to incentivise uptake.
- Clarify "newness in lieu" settings, particularly regarding suppressed land biomass thresholds.

ii. Audit guidance

Clear audit guidance should be jointly developed with the CER to ensure audit readiness and timely ACCU issuance.

iii. Roadmap for future modules

Priority modules should be formally recognised with indicative timeframes and a co-design development pathway, process and resourcing.

iv. Finalise proponent-led process

A permanent, transparent proponent-led method development process—with clear consistency and stakeholder engagement guidelines—should be finalised to enable rapid module innovation.

6. Reconsider the proposed discount architecture

The approach to discounts should consider their appropriateness proportional to the risk and uncertainty they are designed to manage as well as impacts on commercial viability of activities enabled by the method. Under current settings outlined in the draft, cumulative discounts on suppressed land regeneration could reduce early ACCU issuance by up to 65%[7] — precisely when capital expenditure is highest. This materially impacts financing capacity and commercial viability. The ACCU Scheme already includes a risk-of-reversal buffer, permanence period settings and associated discounts. The method draft adds extended baselines, LMS requirements, extended monitoring, reporting and verification (MRV) guidance. Additional discounts risk signalling insufficient confidence in existing and new safeguards and should be considered holistically so as to avoid compounding impacts.

Given that discounts are closely tied to FullCAM-Hybrid uncertainty, expanding measurement flexibility could reduce reliance on blunt discounting. Uncertainty could instead be managed via alternative integrity tools such as map accuracy assessments, periodic field verification, probability-of-exceedance discounts, model validation protocols.

7. Consolidate native forest regeneration into a single module

Multiple interacting factors affect land condition and the draft IFLM method's binary distinction between cleared and suppressed lands is largely artificial and would benefit from consolidation and consistent treatment. Eligibility criteria and activities in the draft IFLM method are already closely aligned, yet

[7] *Carbon Credits (Carbon Farming Initiative – Integrated Farm and Land Management) Methodology Determination 2026*, 'Schedule X – Integrated Farm and Land Management method proposed activity schedule for: Regeneration of native forest on suppressed land (Plain English)', p.78.

measurement and gateway requirements differ. This creates complexity and potential integrity inconsistencies.

CMI recommends a single native forest regeneration module with unified eligibility criteria, a menu of eligible activities, distinct evidence requirements reflecting land history (including clearing events and suppression agents), qualified person sign-off through the LMS. Regeneration activities should be subject to consistent MRV standards and requirements.

8. Manage leakage proportionally to risk and provide a Scheme-level Standard

Leakage remains a material risk to projects but there is no consistent approach across the ACCU Scheme, nor a risk-based, proportional approach. The IFLM draft method proposed Vegetation Accounting Area (**VAA**) approach is administratively complex, disproportionate to the material risk of emissions displacement and may significantly increase costs, particularly when combined with upfront discounting.

CMI recommends a Scheme-wide, risk-based leakage framework, alignment with published and emerging Article 6.4 guidance and consideration of interactions with *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**) reforms. Method-level management should take the form of a simplified, sequential, risk-based approach.

CMI remains committed to supporting the timely finalisation of the method this year. We stand ready to convene our IFLM Taskforce to provide further technical and practical expertise, and to draw on the broader perspectives of our full membership to assist in delivering a robust and scalable outcome.

Should you wish to discuss CMI's submission please contact Emily Tammes (emily.tammes@carbonmarketinstitute.org).

Yours sincerely

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CMI's recommendations to improve the IFLM Method Exposure Draft

1. **Broaden the method scope and ensure that the intent of the IFLM method to scale up land-sector abatement across Australia is realised.** Consultation questions 1 & 7.

To support a IFLM method that incentivises and enables maximum participation, the scope should be broadened to reflect Australia's diverse land tenures, biophysical conditions and management objectives.

As currently drafted, the IFLM method scope restricts scope to a narrow set of currently included carbon sequestration activities and associated land eligibility. Its application and likely uptake is restricted to mostly southern, and eastern Australia – where most ACCU Scheme projects to date have been registered. Significant carbon abatement potential exists outside traditional agricultural freehold farmland and a nationally credible method must reflect the diversity of Australian land ownership and tenure ship. This includes freehold and leasehold agricultural land, crown lease and pastoral lease, Indigenous freehold and exclusive possession Native Title land, conservation land and mixed-tenure aggregation projects. Even though the framework method is designed to be modular and expandable over time, the first version does not yet deliver realisable national, whole-of-landscape applicability. While CMI understands that some activities have been deliberately scoped out of this early version of the IFLM method, we recommend provision is allowed for future expansion within the current framework.

By ensuring that the method scope is sufficiently broad and the framework not attached to activities, the IFLM method can unlock critical new abatement opportunities across much of the Indigenous estate, as well as the semi-arid rangelands which are often a mix of Indigenous, pastoral and conservation reserves. According to the Indigenous Carbon Industry Network, Indigenous Australians hold recognised rights and interests to over 70% of Australia's land mass.[8] If the IFLM method scope and settings are broad enough to encapsulate Indigenous land management practices, as well as more diverse vegetation capable of sequestering carbon, there is a significant opportunity for the method to support Indigenous land management and economic self-determination – in line with the Closing the Gap goals.

A key scope issue is the lack of placeholder for a soil module in the current exposure draft. This is a significant deviation from the original intent of the Blueprint, where Phase 1 of the method included soil and vegetation activities, and the DCCEEW initial scope of work confirmed by Assistant Minister Wilson. Accounting for both carbon pools in combination is a core principle of a genuinely integrated, whole-of-landscape carbon method and fundamental to the design of the IFLM framework. Releasing an IFLM method without a soil module effectively removes the ability to integrate activities across carbon pools on a single property.

The modelling undertaken by CORE Markets shows two largest carbon opportunities under the method come from soil organic carbon stacked with vegetation activities, and native forest regeneration in semi-arid regions (most likely under the current suppressed land module).[9] We understand that the ERAC's review of the 2021 Soil Method is due to be finalised imminently. CMI believes the review and revision of the soil carbon method must be prioritised to ensure inclusion of a mirrored soil module in the first iteration of the released method.

With ERAC and DCCEEW coordination and targeted industry support, development of a soil carbon module can progress alongside any revisions necessary to the standalone soil method in a timely manner. If the 2021 Soil Method Review is unlikely to be completed in line with the method's finalisation before the end of 2026,

[8] Indigenous Carbon Industry Network 2026, *Final statement – 2026 SFF and NICF*: https://www.icin.org.au/2026_final_statement.
[9] See Appendix A.

we ask that hooks be placed in the body of the text that would facilitate the easy inclusion of a soil carbon module when feasible.

2. **Ensure that the architecture of the IFLM method is sufficiently flexible to enable the inclusion of future modules across a broad array of carbon pools and activities, without necessitating legislative change to the method instrument.** Consultation questions 1 & 7.

In addition to the current exclusion of soil as an operational module due to the ERAC review of the soil carbon method, the IFLM method's eligibility settings and equation architecture currently restrict the remit of potential activities solely to sequestration. Section 9 of the exposure draft specifies that the instrument applies solely to projects that sequester carbon in living biomass, dead organic matter, and soil.[10] While the explicit reference to soil is welcome, limiting the method to sequestration departs from the original intention of a comprehensive integrated farm management method.

The constrained scope is reflected in the method equation architecture for calculating net abatement, which gives rise to two main areas of concerns: 1) the treatment of all fire emissions as sources, and 2) the sequestration-only calculation formula. The inclusion of fire emissions – whether from controlled burns or natural disturbance – narrows the pathway for incorporating savanna fire management, or cool-burning fire management activities by Indigenous land managers, without further legislative amendments. It may also have unintended consequences for Indigenous proponents seeking to undertaking cultural burning alongside a native forest regeneration project in the semi-arid rangelands, where fire can be a critical ecological stimulus for species' regeneration.

Excluding emissions from controlled fire from the emissions sources would better align the method with the original Blueprint and ease the later inclusion of a dedicated fire activity module. We believe the net abatement equation could be drafted to accommodate the subtraction of avoided emissions in this iteration. In the interests of facilitating uptake and future-proofing the method, these refinements should be considered prior to finalisation to enable smoother expansion over time.

Additionally, the Blueprint contemplated a subsequent phase of activity modules for rapid development following the introduction of Phase 1, including livestock supplements, beef cattle herd management, feral animal management, on farm waste management, and energy efficiency.[11] Given the relatively narrow scope of the current proposed IFLM method exposure draft, CMI urges that the ERAC and DCCEEW establish clear process steps and a possible indicative timeline to bring additional modules online in a timely manner. This approach would be consistent with Recommendation 5 of the 2022 Independent Review of ACCUs[12] (**2022 ACCU Review**), which proposed that future IFLM modules be developed via the proponent-led method development process. The Review noted that this pathway would support vegetation-appropriate measurement approaches and enable multiple carbon abatement activities suited to individual properties. As the ERAC works with DCCEEW to finalise the IFLM method, CMI encourages consideration be given to additional complementary amendments to the broader ACCU Scheme architecture that may be required to create an accessible pathway for uptake of IFLM projects.

[10] DCCEEW 2025, *Carbon Credits (Carbon Farming Initiative—Integrated Farm and Land Management) Methodology Determination 2026*, Draft Determination, s(9)(1).
[11] Ibid. p.25.
[12] I Chubb, A Bennett, A Gorring & S Hatfield-Dodds 2022, 'Independent Review of Australian Carbon Credit Units: Final Report', p. 12: https://www.dcceew.gov.au/sites/default/files/documents/independent-review-accu-final-report.pdf.

3. **Streamline eligibility criteria and measurement schedules, ensuring consistency across modules and easing implementation of IFLM projects.** Consultation questions 2 &13.

By design, a whole-of-landscape framework method should prioritise consistency across eligible activities to simplify and reduce administrative, management and reporting burdens. This consistency should extend to measurement schedules. However, the current exposure draft does not enable a consistent measurement approach across all activities, with restriction to FullCAM only for the Native Forest Regeneration on Cleared Land, and Reforestation by Environmental or Mallee Plantings (**EP**) modules. It is known that FullCAM is not highly accurate at a project scale, so by mandating its use in the IFLM method, the exposure draft misses the opportunity to improve accuracy of outcomes. Harmonising measurement schedules across IFLM project activities could provide greater consistency and streamline project reporting.

A minimum viable product for the first iteration of the IFLM method should include the three measurement option pathways in the Blueprint, enabling flexibility for land managers and facilitating uptake of the IFLM method.

The current draft separates native forest regeneration activities into cleared and suppressed land applications, despite largely similar eligibility criteria. CMI believes that these modules demonstrate the opportunity to apply a single, unified eligibility framework across the IFLM method. Of particular note, grazing is recognised as a suppressor in both the cleared and suppressed lands modules, yet different measurement approaches apply to each – including one with significant discounts. Given the complex and often mixed land management histories across semi-arid rangelands, this divergence may create integrity risk to the method as different CEAs could be stratified to favourably deploy a module with fewer checks and balances on abatement.

In practice, streamlining eligibility criteria across modules would involve embedding a single set of eligibility criteria within the main body of the legislative instrument, rather than within the modules. As already required in the draft method, the LMS would specify the relevant eligibility criteria for each proposed project, with independent expert sign off providing assurance that the criteria applied were appropriate.

The draft method's patchwork approach to measurement further compounds these challenges. FullCAM-only applies for EP activities and regeneration on cleared lands, while a FullCAM-Hybrid approach applies only for regeneration on suppressed lands. This fragmentation of measurement approaches may present challenges and create barriers to uptake for projects on properties with a mix of cleared and suppressed areas, or that intend to combine plantings alongside regeneration.

Limiting the FullCAM-Hybrid approach to regeneration on suppressed land will reduce uptake for new projects using the EP module, as well as reduce incentives for existing projects to transition to the IFLM method. As outlined in our position below, CMI recommends that measurement-only, as well as calibrated model approaches be made available across all activity modules in the first iteration of the IFLM method. Expanding measurement flexibility would not only improve consistency but also encourage the uptake of higher-accuracy approaches across the full suite of IFLM activities.

4. **Include all the measurement schedules of the original Blueprint in the IFLM method and enable their application across all activities under.** Consultation questions 4 &13.

Harmonising and streamlining measurement and accounting across all IFLM activities will materially support project stacking and uptake, while simultaneously improving accuracy and credibility of reported project outcomes. CMI recalls that in its advice to the Assistant Minister on the 2024 Reforestation by Environmental

or Mallee Plantings Method, the ERAC recommended that DCCEEW 'include provisions to allow the use of models equivalent to or better than FullCAM, to encourage innovation and the use of best-available-technology.'[13] In that advice, the ERAC explicitly identified the IFLM method as the first opportunity to incorporate a FullCAM or equivalent model option.

The March 2025 DCCEEW update on the method referenced development of a qualification pathway for FullCAM-equivalent models, outlining that a hybrid measure-model approach was preferable to reduce risk of bias and increase confidence in project outcomes.[14] While the current exposure draft introduces a new FullCAM-Hybrid measurement approach, it is limited to native forest regeneration projects on suppressed land and includes substantial new discounts that are likely to render many projects commercially unviable.

Continued reliance on FullCAM, particularly for regeneration projects in semi-arid regions, also risks compounding registration delays – DCCEEW is yet to finalise Public Release 2024 – which may contribute to continued public scrutiny on regeneration outcomes. Being tied to the current FullCAM calibrations is thus likely to limit uptake in areas where the model does not perform well, potentially significantly reducing future eligible abatement under the IFLM method.

Reliance on FullCAM is unlikely to improve outcomes in carbon projects on suppressed land under the IFLM method for 2 main reasons:

i. FullCAM is calibrated at a national-scale and has not been tuned for mixed-age regenerating native forests across the semi-arid rangelands of Central and Western Australia.[15] Furthermore, the current guidelines restrict opportunities to tune the model for projects locations.
ii. The Tree Yield Formula (**TYF**) deployed by FullCAM to predict project outcomes does not account for grazing pressure, climatic variation, and degree of suppression.[16]

Given that the semi-arid rangelands across Central and Western Australia with historic grazing pressure and suppression from native and feral herbivores, represent the area with the greatest potential uptake for IFLM projects, [17] the method needs to include alternative approaches to project measurement and reporting. Decoupling project eligibility and outcomes from exclusive reliance on FullCAM would create new avenues for higher accuracy reporting and strengthen public confidence in native forest regeneration projects.

Consistent with the Blueprint, CMI advocates for the inclusion of three distinct measurement and modelling approaches, which would be applicable across all modules to streamline project reporting requirement and facilitate project transition to utilise higher accuracy measurement options.[18]

i. **National model (FullCAM) with supplementary project data**: this approach most closely resembles the FullCAM-Hybrid proposal put forward by DCCEEW in the current exposure draft but with the addition of field measurements to 'true up' model outputs at least every five years,

[13] Emissions Reduction Assurance Committee 2024, *ERAC Letter of Advice to the Assistant Minister on the draft Environmental Plantings method*, p. 2: https://www.dcceew.gov.au/sites/default/files/documents/erac-letter-advice-assistant-minister-draft-environmental-plantings-method.pdf.

[14] [14] DCCEEW 2025, *Australian Carbon Credit Unit Scheme: Integrated Farm and Land Management method development: March 2025 update*, p. 7: https://www.dcceew.gov.au/sites/default/files/documents/accu-integrated-farm-land-mgt-method-march-2025-update.pdf.

[15] Paul & Roxburgh 2025, 'Carbon sequestration in woody biomass of mulga (Acacia aneura) woodlands: confidence in prediction using the carbon accounting model FullCAM', *The Rangeland Journal*, (47), p.11: https://connectsci.au/rj/article/47/3/RJ24027/200626/Carbon-sequestration-in-woody-biomass-of-mulga.

[16] Ibid. p. 16.

[17] According to DCCEEW, semi-arid rangelands make up roughly 81% of Australia's land mass and are often home to many Indigenous groups. See: DCCEEW 2021, *Outback Australia – the rangelands*, https://www.dcceew.gov.au/environment/land/rangelands.

[18] IFLM Taskforce 2021, *Blueprint for holistic approach to carbon farming*, p.17: https://carbonmarketinstitute.org/app/uploads/2021/08/AL-MAP-Method-Blueprint_final.pdf.

aligned with gateway checks. The current exposure draft proposal to delay true-up from field measurements until year 10 is problematic as early project years are when more minute changes detectable by field measurement and often undetected in the national-scale datasets that inform FullCAM, are most material.

ii. **Alternative models with validation protocols:** a precedent for alternative models exists in Schedule 2 of 2021 Soil Method. Under this pathway, proponents would develop project-specific models informed by upfront field measurements of carbon stock. Model accuracy is assured through ongoing model validation protocols, including periodic field measurements and a probability of exceedance discount.

iii. **Direct Field measurement:** rather than rely on a model, proponents could elect to measure all carbon stock changes at a reporting event through a multi-phase sampling approach. While higher cost, this approach offers the highest accuracy of measurement and may be appropriate for complex and high-value projects. It would also remove the need for problematic instruments used to manage FullCAM uncertainty (e.g. Discounts, 5 tonne rule, forest cover transition requirement).

Incorporating all three measurement and modelling approaches in the IFLM method would provide equitable pathways of uptake for diverse proponents. CMI also supports the inclusion of a FullCAM-only option – albeit balanced with discounts to support confidence in project outcomes. FullCAM remains a cost-effective modelling tool and, importantly, provides a forward abatement estimate that enables landholders, financial institutions and investors to assess project viability.

Extending alternative and hybrid measurement options to modules beyond regeneration on suppressed land would likely facilitate greater transition from existing standalone EP and Native Forest from Managed Regrowth projects. Given that the utilisation of FullCAM-equivalent models for EP was outlined as an area of consideration in the March 2025 DCCEEW update, CMI was surprised that the draft method did not include a pathway for the adoption in this module. By creating a qualification path for FullCAM-equivalent models, and embedding hybrid and measurement approaches, the IFLM method can set a new benchmark for higher accuracy accounting of project outcomes that will increase confidence and investment in the ACCU Scheme.

5. Establish guidelines and processes to facilitate uptake of the IFLM method now, including for transition arrangements, audits, and future module development.

Although the IFLM method is still to be finalised, in addition to our previous recommendations, CMI urges the government to commence working on key guidance and processes beyond the specific exposure draft that will support uptake of the IFLM method.

i. **Clarify transition arrangements**

Clear transition settings are critical, including the treatment of crediting periods and newness in lieu provisions for vegetation projects (as raised in Consultation questions 3 & 7). CMI acknowledges that transition is not mandatory in the current method draft and strongly supports retaining this position. Projects should not be required to transition to the IFLM method, and standalone methods should remain available to enable land managers to select the approach best suited to their property and risk profile.

However, in the current drafting, transitioning projects are not entitled to a new crediting period. Allowing proponents to apply for a new crediting period may meaningfully incentivise further

transition. A time-limited approach, similar to that taken in the 2025 Landfill Gas method where projects are eligible for a new crediting period for a defined window, could strike an appropriate balance.

Finally, we note that for regeneration on suppressed land projects there is an additional eligibility restriction that requires eligible land to have a starting biomass of less than 5 metric tonnes of above ground biomass per hectare. This restriction may preclude many existing projects in these regions from transitioning, and thus any newness in lieu provisions for this restriction should be clarified as a priority to provide certainty.

ii. **Develop clear guidelines outlining the audit process for IFLM project reports.**

As identified in the King Review, an integrated carbon method offers a significant opportunity to increase uptake of carbon projects on smaller projects through stacking of activities and streamlining of reporting and auditing processes. As a priority, DCCEEW should collaborate with the CER to develop clear guidelines that outline the audit process for IFLM project reports. This will ensure that auditors are able to develop any necessary skills alongside project uptake, streamlining the timeline for first ACCU issuance from IFLM projects.

iii. **Establish a roadmap of priority future modules for the IFLM method, including the process by which these modules will be developed.**

The IFLM Blueprint identified priority modules for development in Phase 2 of the method, including livestock feed supplements, cattle herd management, enteric emissions management, improved waste management, and improved farm efficiency/electrification.[19]

CMI requests that these activities, as along with avoided clearing (where consistent with the EPBC Act reforms), be formally recognised as priority future modules for the IFLM method. To ensure timely integration, a clear development roadmap with indicative timeframes and module development processes should be agreed. The IFLM framework and its modules present an opportunity to pilot a strengthened co-design process for method development. DCCEEW should consider how best to support such a process in parallel with finalising the core IFLM instrument.

iv. **Finalise the proponent-led method development process, including important guidelines for consistency, to enable an expedient development process for innovative modules that will enhance outcomes across diverse Australian landscapes.**

With methods from the first round of the interim proponent-led method development process well under development, the ERAC should work with DCCEEW to finalise a permanent and transparent proponent-led method development process.

Establishing a clear and efficient process will enable future IFLM modules to be developed expediently via the proponent-led process, as recommended by the 2022 ACCU Review.[20] Enabling a module development pathway to progress alongside finalisation of the IFLM method

[19] IFLM Taskforce 2021, *Blueprint for holistic approach to carbon farming*, p.25: https://carbonmarketinstitute.org/app/uploads/2021/08/AL-MAP-Method-Blueprint_final.pdf.

[20] I Chubb, A Bennett, A Gorring & S Hatfield-Dodds 2022, 'Independent Review of Australian Carbon Credit Units: Final Report', p. 12: https://www.dcceew.gov.au/sites/default/files/documents/independent-review-accu-final-report.pdf.

will ensure that the method is able to incorporate innovative new activity modules sooner, increasing its ability to drive outcomes across varied landscapes.

Through CMI's engagement on the first tranche of proponent-led methods, we have repeatedly highlighted the need for clear guidelines on method consistency including for taxonomy, inclusions, measurement principles and stakeholder engagement expectations. The development and publication of supporting guidelines will be integral to ensuring a credible and functional proponent-led method development process. We encourage the ERAC Secretariat to prioritise finalisation of this work which we understand is under development and consider resourcing needs for proponents.

Taking these parallel steps—clarifying transition, strengthening audit readiness, establishing a module roadmap and finalising the proponent-led pathway—will ensure that the IFLM method launches not only as a new legislative instrument, but as a practical and scalable framework capable of delivering integrated carbon outcomes across Australia's landscapes.

6. **Reconsider whether the proposed discount approach is the appropriate vehicle to manage uncertainty.** Consultation questions 2, 8, 9 & 11.

Under the current IFLM method exposure draft, the cumulative discount structure applied to native forest regeneration on suppressed land projects is likely to render most, if not all such projects commercially unviable. This will materially reduce the ability of the IFLM method to contribute to Australia's achievement of its 2035 NDC, while also restricting the opportunity for landscape-scale regeneration across much of Central and Western Australia. Any additional discounts should consider appropriateness proportional to the risk they are designed to manage as well as impacts on practical implementation and investability.

The proposed draft method already strengthens risk management beyond existing Scheme-level safeguards through extended baselines, mandatory LMS and new guidance on the use of LiDAR. The additional discounts included for the suppressed land are overly conservative in this context and may negatively impact overall confidence in Scheme outcomes.

The current ACCU framework already incorporates significant protections, including the risk of reversal buffer and permanence period discounts which are important safeguards designed to ensure conservatism of credited outcomes. The IFLM Blueprint envisaged higher accuracy project measurement and reporting, increasing confidence in outcomes and facilitating greater uptake. However, the exposure draft restricts the application of new, higher accuracy technologies, while introducing substantial new discounts specific to native forest regeneration projects on suppressed land.

The exposure draft introduces; a temporary attribution discount to account for uncertainty that management changes have caused the increase in carbon stock, which is returned at gateway checks; and a TYF discount to account for uncertainty in the FullCAM-predicted carbon stock increase for the project. These discounts are not appropriate, nor proportional to the perceived risk and uncertainty they are purported to manage. The combined impact of these discounts can result in up to 65% reduction in ACCUs issued in their first years- precisely when capital expenditure for projects is highest. CMI members in the finance sector have indicated that this level of discounting would materially reduce the debt capacity of properties, significantly reducing the likelihood that a financial institution would provide finance for an ACCU Scheme project. Reduced early-year cash flows may also limit the ability of proponents to secure eligible interest holder consent in instances where there is a mortgage over the property. The practical consequence of the proposed discount structure would likely be a significant reduction in projects registered.

Furthermore, the release structure for both discounts means that a project potentially receives ACCUs with mixed vintage years in a single issuance. CMI has previously suggested that the Safeguard Mechanism review, scheduled for 2026 could consider the inclusion of vintage restrictions for ACCUs used for compliance, as a means of incentivising direct decarbonisation over banking.[21] With the Safeguard Mechanism review scheduled for this year, it is imperative that DCCEEW consider potential outcomes of the review, and their likely interaction with ACCU Scheme method settings such as those proposed in the IFLM exposure draft.

Given that the discounts are largely tied to uncertainty associated with the FullCAM-Hybrid measurement approach, expanding the method to include direct measurement, or locally calibrated models could reduce reliance on blunt discount factors. Uncertainty could instead be managed through established mechanisms such as map accuracy assessments, periodic field verification, probability-of-exceedance discount, and validation protocols.

CMI therefore urges DCCEEW to reconsider whether the proposed discount architecture is the most appropriate tool to manage uncertainty. Alternative approaches – grounded in improved measurement and verification rather than cumulative discounting – would better support uptake of native forest regeneration projects on suppressed land while maintaining the integrity of the ACCU Scheme.

7. **Combine native forest regeneration activities into a single module, with clear eligibility criteria, and distinct evidence requirements to distinguish historical conditioning.** Consultation questions 2, 4, 8.

CMI supports consolidating native forest regeneration activities into a single activity module, underpinned by consistent eligibility criteria (reflecting those already outlined in the draft), but distinct evidence requirements to reflect differing land management histories.

A unified regeneration module would likely facilitate stronger uptake of the IFLM method, particularly on properties where land clearing and suppression histories intersect. The LMS provides an appropriate mechanism for proponents to document land condition (present and historic), identify suppression mechanisms, and outline proposed regeneration activities. Requiring sign off by an appropriately qualified person would provide assurance regarding both the accuracy of the management history and the appropriateness of the proposed interventions.

Across much of Australia's pastoral estate – where these projects are most likely to occur – land management history is complex and overlapping. Clearing and suppression by herbivores frequently co-exist, resulting in mosaic landscapes with varied ecological baselines. Under the current exposure draft, this reality translates into a patchwork of eligibility criteria and measurement approaches within a single property.

From an integrity perspective, it is notable that the regeneration on cleared lands module does not require 5-yearly gateway checks. This marks a departure from the 2019 guidance for stratification, evidence and records in the Native Forest from Managed Regrowth method[22] on which this module is based, and a reduction in the robustness of the monitoring, reporting and verification for any projects registered under this module in the current exposure draft.

CMI considers the distinction drawn between cleared and suppressed lands in the current draft method is largely artificial and not reflective of real landscapes. The eligibility criteria for the two modules are closely

[21] Carbon Market Institute 2023, *DCCEEW Safeguard Mechanism Rules consultation*, p. 10: https://carbonmarketinstitute.org/app/uploads/2023/02/FINAL_Carbon-Market-Institute-submission_Draft-Safeguard-Rules-1.pdf.
[22] Clean Energy Regulator 2019, *Guidelines on stratification, evidence and records.*

aligned, including recognition of grazing as a suppressor of vegetation growth in the cleared lands module. The proposed management activities in each module are similarly aligned. This suggests that both modules could be merged into a single native forest regeneration module, with a menu of eligible activities. Under this approach, the LMS would document the previous management history, identify suppression factors, and proposed activities to increase carbon stock. A qualified person, who would verify the proposed schedule of activities is appropriate to the property, providing confidence that the management history is accurate, and proposed activities are appropriate. Deviation from the LMS would be managed within the existing compliance architecture of the ACCU Scheme, overseen by the CER.

Consistent with the Blueprint, the IFLM method should establish broad categories of carbon abatement pools, with a menu of activities sitting beneath them. Native forest regeneration is the largest total carbon abatement opportunity in the first version of the IFLM method, however uptake of these projects may be constrained if required to apply differential rules across single properties in a patchwork that reflects the diverse histories of Australia's landscapes. Given the similarities in the existing modules, CMI recommends that ERAC task DCCEEW with consolidating them into a singular native forest regeneration module with a menu of activities to enable a flexible IFLM method that is adaptive to properties with diverse land management histories. Furthermore, this would ensure that activities undertaken on lands with both baselines would be subject to the same rigorous MRV process, ensuring that IFLM projects are centred on integrity.

8. **Set leakage management standards at a Scheme level, with reference to international guidelines developed for Article 6.4 methods by the Paris Agreement Supervisory Body.** Consultation questions 10 & 11.

Leakage remains a material integrity risk but is not currently monitored consistently across the ACCU scheme. The proposed Improved Management in Multiple-use Public Native Forests (**INFM**) method currently under development incorporates a leakage proposal at a method level. Equally, the proposed Reduced Disturbance of Coastal and Floodplain Wetlands by Managing Ungulates is also intended to include leakage. However, this highlights the necessity of establishing a consistent approach at the Scheme-level to support a future module development pathway under the IFLM method. In its submission to the recent INFM method consultation, CMI highlighted this and suggested that any approach to leakage is aligned with the Paris Agreement Article 6.4 Supervisory Body's Standard for leakage.[23] Adopting an approach consistent with international best practice would strengthen the integrity of the ACCU Scheme and futureproof it in the event of expanded international carbon market linkages.

The leakage mechanism proposed in the IFLM method – centred on VAAs is complex and risks increasing project implementation costs. The interaction between reforms to the EPBC Act and the potential leakage protected through the VAAs remains unclear, raising further uncertainty.

Managing leakage via VAAs is likely to increase project costs and well as complexity of implementation. The requirement to update CFI Act Mapping Guidelines to accommodate this approach further illustrates the operational complexity of implementation and may risk delaying the finalisation and rollout of the IFLM method. When combined with significant upfront discounting—already concentrated in the early, capital-

[23] CMI 2026, *Submission: ERAC: Improved Management in Multiple-use Public Native Forests*, p. 5: https://carbonmarketinstitute.org/app/uploads/2026/02/CMI-SUBMISSION_INFM-Method.pdf. Article 6.4 Supervisory Body 2025, *Standard: Addressing leakage in mechanism methodologies*, v.01.0: https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-005.pdf.

intensive years of a project—the additional compliance burden associated with mandatory VAA mapping and monitoring is likely to undermine commercial viability.

Instead, method-level management of leakage should take the form of a simplified, risk-based approach – as outlined in the Article 6.4 Standard. The approach to leakage within the IFLM method should mirror the sequential approach outlined in the Article 6.4 standard, which may take the form of a decision tree, with risk-based triggers. A similar proposal was developed during the June 2024 Technical Workshop on the IFLM method, held in Canberra and attended by DCCEEW staff, and can be accessed on the IFLM Hub webpage.[24]

As noted above, CMI refers to the detailed submission prepared by our IFLM Taskforce for more targeted, technical inputs to this consultation.

We recognise this consultation as a significant milestone in the development of the IFLM method. However, we reiterate that several substantive refinements are required to the method to ensure that the method is commercially viable, experiences uptake, and is futureproofed to support innovation and genuine whole-of-property carbon management. We remain committed to the timely finalisation of the IFLM method in 2026 and collaborating with the DCCEEW and ERAC in addressing the key issues and concerns in this submission by providing significant technical and practitioner expertise through our IFLM Taskforce and broader membership.

[24] CMI IFLM Taskforce 2024, *Discussion Paper: Integrated Farm and Land Management (IFLM) Method Framework*, p. 14: https://carbonmarketinstitute.org/app/uploads/2024/05/IFLM-Method-Discussion-Paper-CMI-TF.pdf.

Appendix A: CORE Markets Modelling Results

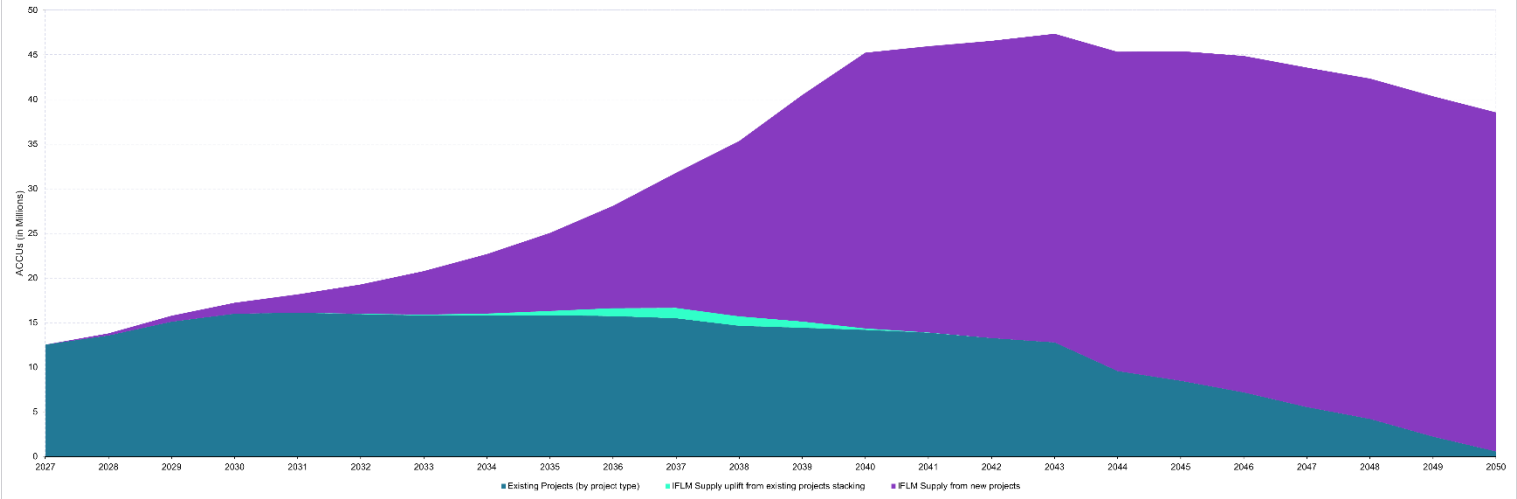

Figure 1: Potential stacking uplift and supply from IFLM projects to 2050 using central assumption. Source: CORE Markets & CMI, IFLM Potential Abatement Model.

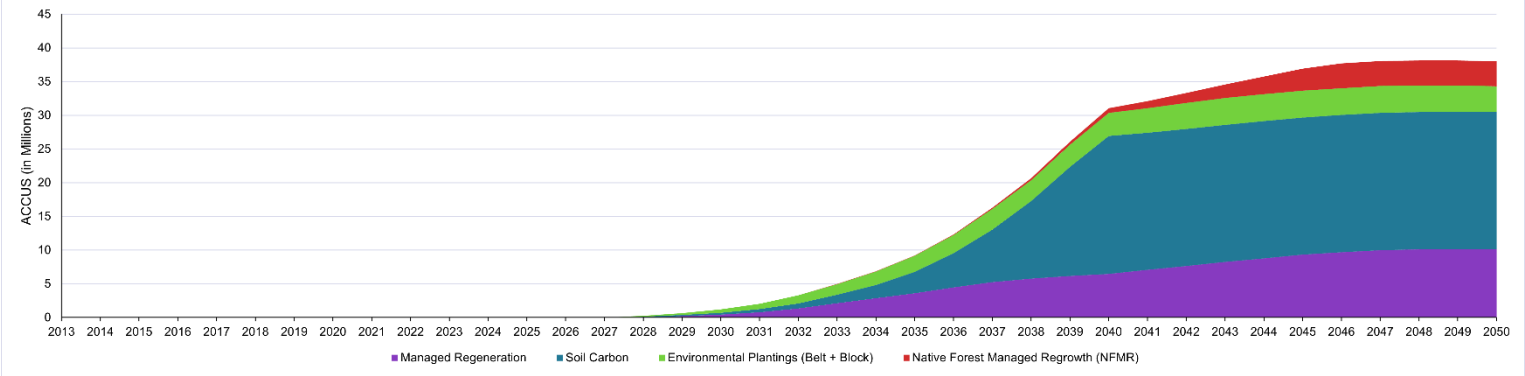

Figure 2: Volume of potential abatement under different activities in the IFLM method using central assumption. Source: CORE Markets & CMI, IFLM Potential Abatement Model.

Appendix B: DCCEEW & ERAC Consultation Questions

Questions from the Department

The department welcomes all feedback on the proposed IFLM method. The Department would particularly value feedback on the following questions.

1. 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?
2. Will the IFLM method remove barriers to participation in the ACCU Scheme for land holders?
3. The exposure draft allows projects to transition from existing projects under *the Carbon Credits (Carbon Farming Initiative – Reforestation by Environmental or Mallee Plantings – FullCAM) Methodology Determination 2024* and *Carbon Credits (Carbon Farming Initiative – Native Forest from Managed Regrowth) Methodology Determination 2013* to the IFLM method where they meet the eligibility requirements. Are there considerations for transferring projects that have not been sufficiently addressed in the exposure draft for these projects? What additional transitional provisions are required to enable existing Human-Induced Regeneration (HIR) projects to transition to the IFLM method?
4. Does the proposed method support rural and remote communities, including First Nations Australians, to participate in and benefit from the ACCU Scheme?

5. What additional project information for publication could be required to section 93A of the CFI Rule ('Publication of relevant information') to improve transparency and provide confidence that IFLM projects are generating genuine abatement?
6. In October 2024, the Government prioritised the Queensland Department of Environment, Science, Tourism and Innovation to develop the 'Improved Avoided Clearing of Native Regrowth' method, which may include activities similar to those in the IFLM method. The department welcomes any feedback from stakeholders on how the two methods could usefully co-exist to maximise carbon abatement while continuing to meet the offsets integrity standards (OIS).

Questions from ERAC

7. Are the current restricted activities appropriate (see Part 3, Division 6 of the exposure draft)? Are additional restrictions required or are any restrictions no longer required?
8. The scientific literature suggests that grazing by herbivores (livestock and wildlife) may affect carbon stock accumulation in woody vegetation, but the impacts of grazing can be difficult to distinguish from the influence of rainfall variability and other factors. As a result, growth in woody vegetation cannot easily be attributed to changes in management practices. A suite of method settings is proposed that are intended to ensure credited abatement is additional and can be attributed to the project activities undertaken.
    a. Is the range of method settings sufficient to ensure that any measured changes in woody vegetation are correctly attributed to changes in management practices?
    b. If not, how might the scientific rigour and overall integrity of removal of grazing as a suppressant with respect to regeneration of woody vegetation be improved?
    c. Will the range of method settings provide a conservative estimate of abatement?
9. A discount when issuing ACCUs is proposed to account for uncertainty in the attribution of regeneration of woody vegetation to the project activity. Different discount rates have been proposed for lower and higher rainfall areas, to reflect variable forest responses to rainfall and associated attribution uncertainty in these landscapes.
    a. Is a 500mm average annual rainfall threshold an appropriate proxy for regions with higher and lower uncertainty of attribution? Should rainfall frequency, as well as average annual rainfall, be usefully incorporated into the method's settings and if so, how?
    b. Would other proxies, such as vegetation type or ecosystems, more accurately account for variation in the growth rate of woody vegetation?
10. The exposure draft includes an approach (the hurdle requirement) to manage possible leakage resulting from a project (see Part 4, Divisions 4 and 5 of the exposure draft). This refers to the risk that project activities may drive changes in agricultural activities outside of the Carbon Estimation Areas (CEAs), potentially including increased clearing or greater grazing intensity outside the CEAs.
    a. Are the proposed requirements appropriate to manage the risk of leakage and minimise the transaction burden for projects?
    b. Are there other project emissions beyond a change in carbon stock that should be accounted for outside the project area, as they are also likely to be a result of leakage (rather than business as usual land management practices)?
    c. Should additional discounts apply to account for the risk of leakage?
11. The exposure draft includes an approach where areas not stratified as CEAs or exclusion areas must be stratified as Vegetation Accounting Areas (VAAs) for applying the hurdle requirement (Division 4, section 15 and 16). It is intended an exclusion area is an area without vegetation and where vegetation will not grow (i.e. waterways, infrastructure, rocky outcrops or roads). It is proposed the CFI Mapping Guidelines will be updated in line with this – if required.

    a. What issues might arise if the CFI Mapping Guidelines were updated to reflect only these areas that can be mapped as exclusion areas?

12. What are the benefits and risks if landscape rehydration were to be included as an eligible management activity in the 'suppressed land' module?
    a. Are restrictions required to ensure hydrological management does not lead to leakage or adverse impacts on broader landscape hydrology?
    b. Are any of these concerns managed through existing regulatory requirements?
13. The exposure draft proposes a new measurement approach that combines the use of FullCAM with local measurements derived from deploying remote sensing technologies (the FullCAM-Measure Hybrid approach). The FullCAM-Measure Hybrid approach proposes that measurements are taken at 5-yearly intervals for carbon stock and canopy projection cover – the intent being that this enables more accurate calibration of the Tree Yield Formula.
    a. From a scientific or project implementation perspective, are there any technical considerations that suggest the proposed approach for the FullCAM-Measure Hybrid approach should be adjusted?
    b. Are disturbance events appropriately accounted for in the proposed approach?
    c. The method includes a 40% Tree Yield Formula discount to manage the uncertainty associated with the FullCAM-Measure Hybrid approach, which would be returned if the project's abatement is demonstrably achieved in year 25. Does the proposed approach to use the Tree Yield Formula discount conservatively address uncertainties in sampling and calibration?
    d. Do you foresee situations when proponents may switch between spatially referenced / spatially explicit sampling approaches between reporting periods? How can this be facilitated while maintaining the integrity of the sampling approach?
    e. Should the method allow projects to be credited based on direct sampling of biomass without the use of the Tree Yield Formula. For example, using multi-phase sampling and validated maps that are trained using LiDAR?
    f. Could the method be improved by allowing other project activities to use the FullCAM-Measure Hybrid approach?
14. The exposure draft requires a qualified person to assess the land management strategy. Do the proposed requirements defining a qualified person (see sub-section 22(9)) strengthen confidence the project eligibility requirements are being met and manage risk of insufficient available qualified persons? Is the qualified person definition sufficiently broad to capture First Nations knowledge holders?

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