



Australian Land
Conservation Alliance

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Land, Forest and Blue Carbon Methods Team
Department of Climate Change, Energy, Environment and Water
John Gorton Building, King Edward Terrace
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Via online portal
Cc: ACCUScheme@dcceew.gov.au

6 March 2026

Dear Carbon Methods Team,

RE: Submission on the draft Integrated Farm and Land Management (IFLM) method

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to make a submission to the Department and the Emissions Reduction Assurance Committee on its draft Integrated Farm and Land Management (IFLM) method consultation.

ALCA is Australia's peak body that represents organisations that work to conserve, manage, and restore nature on privately managed land. The conservation efforts of our 22 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds \$400 million.

Many of our member organisations engage in the carbon market to help fund their conservation efforts. ALCA's submission takes a top-level view of key concerns with the current draft of the method; several of our members may make their own submissions with a greater focus on specific technical details within the draft method.

Summary

ALCA is deeply concerned that the current draft of the IFLM method is highly impractical for conservation organisations to utilise. This outcome contrasts directly with the framework method's stated objective of being "...intended to streamline participation... [and] designed to allow more activities"¹. We are further concerned that the regularly delayed, drawn-out process of method development for IFLM has still led to a method that is largely unworkable for our sector in its current form – we would not envisage many, if any, of our member organisations commencing projects under the IFLM method in its current form.

Our sector has three key concerns about the draft method, namely:

1. The need for clarity on – and removal of – tenure restrictions;
2. High-burden leakage rules (especially for conservation organisations with extensive national or state-wide property holdings); and
3. An approach to discounting that would make most projects commercially unviable.

A short list of other issues has also been provided after these key concerns below.

¹ p4, ACCU Scheme Integrated Farm and Land Management method detailed outline – Explanatory material; [https://storage.googleapis.com/files-au-climate/climate-au/p/prj39b6a9a8de2139c161369/page/Explanatory Material for the ACCU Scheme IFLM method PDF 1.1MB .pdf](https://storage.googleapis.com/files-au-climate/climate-au/p/prj39b6a9a8de2139c161369/page/Explanatory%20Material%20for%20the%20ACCU%20Scheme%20IFLM%20method%20PDF%201.1MB.pdf)

Key issues

1. Land use / land use history restrictions

It is not completely clear, but the draft method appears to inadvertently place de facto restrictions upon land tenure and/or land uses upon which IFLM projects can occur. For example, the use of references to ‘farm’ – which excludes non-agricultural land, such as land under conservation – is a legacy definition that does not appear to have a clear public policy purpose as it relates to this method.

It is uncommon for land under conservation to be used concurrently for agriculture, and where agriculture is undertaken, it is ordinarily only in a transitional arrangement (e.g., until destocking can occur), or in limited circumstances for environmental management (e.g. via grazing to suppress weeds). If there is a project requirement that the project land must have been recently used for agriculture, this would drastically reduce the conservation sector’s ability to utilise the IFLM method.

ALCA’s view is that all appropriate land being managed for conservation should be eligible for IFLM projects, and that restrictions on projects should not occur purely on the basis that the land is being managed for conservation, or, rather, *not* being managed for another purpose (such as agriculture); further, the underlying tenure type of the land should not, in and of itself, be a barrier to IFLM projects.

Key Recommendation 1: Revise the draft determination to ensure that land use (and, where relevant and de facto, tenure) are not a basis for preventing IFLM projects to occur upon land that is (or will be) managed for conservation.

2. High-burden leakage rules

Most ALCA member organisations engage in on-ground conservation as their primary purpose. These member organisations include land conservancies that acquire land for the sole purpose of protecting, managing, and restoring it for conservation. Some land conservancies are focused upon a single State or region; others are national in scope – many have property portfolios in the hundreds of thousands of hectares; a few have millions of hectares under management.

Other than for minor incidental clearance related to necessary infrastructure to manage these properties (for example, ongoing track maintenance, fire management, or the occasional new building), these organisations do not engage in the clearance of native vegetation as it is contrary to the very purpose of their organisations.

An approach to leakage that requires detailed reporting on the entire property portfolio will be prohibitively expensive for all but the smallest conservation property holding organisations – and in any case, wholly unnecessary given the conservation purpose of these organisations.

On this basis, ALCA recommends that a general risk-based approach to leakage needs to be adopted to account for the **genuine** risk of land clearance and avoid unnecessary costs. In the absence of this generalised approach, ALCA recommends that organisations with an environmental Deductible Gift Recipient (DGR) status are provided with much-reduced requirements on leakage; for example, providing information on the property / property aggregation directly relevant to an ACCU project, rather than nationwide or statewide conservation property holdings.

Key recommendation 2: Adopt a risk-based approach to leakage rules.

Key recommendation 3: If a general risk-based approach to leakage is not adopted, provide environmental charities (i.e. organisations with environmental Deductible Gift Recipient (DGR) status) with substantially lower requirements regarding leakage, such as only being required to provide information on property / property aggregations directly relevant to an ACCU project, rather than nationwide or statewide conservation property holdings.

3. Unviable approach to discounting

The currently proposed 40% discount for Tree Yield Formula (TYF) uncertainty would make the overwhelming majority of projects commercially unviable.

ALCA recommends that the approach to this discount be substantively revised – for example, by adopting, to the extent possible, the same approach as the “Temporary attribution discount”, where ACCUs are returned when the project proponent provides appropriate assessments that demonstrate project progression.

Key recommendation 4: That the 40% discount for YTD uncertainty be replaced with a more commercially workable approach, such as, for example, an approach similar to that taken for the “Temporary attribution discount”.

Further issues

As the peak body for private land conservation, ALCA is understandably focused on carbon projects also delivering, wherever possible, positive outcomes for biodiversity. We welcome the draft method’s inclusion of infill plantings for biodiversity and urge that the method should focus on high-quality environmental restoration.

For certainty, ALCA urges that the transition provisions from old methods to new methods are provided up-front.

ALCA also recommends that the method should adopt a technology neutral approach, namely, that FULLCAM equivalent or ‘better models’ (i.e. models with better accuracy rates) should be useable by IFLM method projects.

Recommendation 5: Retain the method’s scope to allow infill plantings that deliver outcomes for biodiversity.

Recommendation 6: To the extent possible, ensure that the IFLM method focuses on delivering high-quality environmental restoration.

Recommendation 7: Transition provisions from old methods to new methods should be provided up-front at the commencement of the IFLM method, not deferred until a later date.

Recommendation 8: The IFLM should adopt a technology neutral approach which allows FULLCAM equivalent or ‘better models’ (i.e. models with better accuracy rates) to be useable by IFLM method projects.



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Recommendation 9: Noting that currently a measurement approach for environmental plantings is not available (only FullCAM), ALCA recommends that the method allow options – both a measurement only approach, and a hybrid measure-model approach.

Thank you again for the opportunity to provide feedback on the draft IFLM method.

Australian Land Conservation Alliance

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our twenty-two member organisations are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Biodiversity Legacy
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- National Landcare Network
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- Wildlife Bank
- World Wildlife Fund - Australia

ALCA member land conservation efforts have influenced over 9.3% of Australia with more than 4,000 landholders. We have over 70,000 supporters and our combined annual turnover exceeds \$400 million. Together ALCA and its members address some of the most pressing conservation issues across the country, including restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and funding and using nature-based solutions to tackle climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spill-over effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.