

Proposed Change to the Soil Organic Carbon Method 2021 Supplement

August 2026



The National Farmers' Federation (NFF) is the voice of Australian farmers.

The NFF was established in 1979 as the national peak body representing farmers and more broadly, agriculture across Australia. The NFF's membership comprises all of Australia's major agricultural commodities across the breadth and the length of the supply chain.

Operating under a federated structure, individual farmers join their respective state farm organisation and/or national commodity council. These organisations form the NFF.

The NFF represents Australian agriculture on national and foreign policy issues including workplace relations, trade, and natural resource management. Our members complement this work through the delivery of direct 'grass roots' member services as well as state-based policy and commodity-specific interests.

NFF Member Organisations



18 August 2026

ACCU Secretariat
Methods and Assurance Committee Branch
Department of Climate Change, Energy, the Environment, and Water
King Edward Terrace
Canberra ACT 2600

Via Email: ACCUSecretariat@dcceew.gov.au

Dear Sir / Madam,

RE: Proposed Change to the Soil Organic Carbon Method 2021 Supplement

The National Farmers' Federation (NFF) welcomes the opportunity to provide feedback on proposed changes to the Soil Organic Carbon Method 2021 Supplement. NFF recognises the importance of methodologies under the Australian Carbon Credit Unit (ACCU) Scheme continuing to meet the Offsets Integrity Standards. We note the Emissions Reduction Assurance Committee (ERAC) found the Soil Organic Carbon Method continues to meet five of the six Standards, but recommended changes to ensure crediting remains conservative.

In responding to these findings, it is equally important that changes preserve confidence among farmers and project proponents alike who have made long-term investment decisions based on existing methodology settings. While integrity is fundamental, so too is confidence that Scheme settings will remain sufficiently stable for those undertaking long-term investment decisions. We recognise that the integrity issue emerged through the operation and subsequent review of its establishment. This reinforces the importance of ensuring methodologies are developed with the necessary rigour upfront to avoid such risks. Where changes are required, they should be implemented in the least burdensome and disruptive manner possible with appropriate regard to existing projects.

NFF is also concerned by the limited consultation period provided for changes the Department itself describes as material. Submissions opened on 28 July and close on 18 August providing only just over three weeks for proponents and industry to assess complex changes with potentially significant commercial implications.

Finally, NFF is disappointed that the outcome of the Review means a soil carbon activity module will no longer be included in the first version of the Integrated Farm and Land Management (IFLM) methodology. The Department intends instead to commence this work next year. This is difficult to reconcile with successive Government commitments to deliver an integrated IFLM, and the Assistant Minister's assurance that Government remains squarely focussed on its timely development as a priority. We also note that as the proposed adjustments in response to the integrity issues are relatively straightforward and do not require changes to the determination itself, the existing methodology can be readily mirrored and included as an activity module as part of the IFLM.

In these circumstances, NFF does not consider that a separate proponent-led development process for the soil carbon module is warranted. Such a process would introduce additional development and consultation requirements despite the extensive consideration already undertaken through the ERAC Review. Where the underlying methodology remains sound and the required changes are targeted to the Supplement, the more practical

approach is to incorporate the existing determination into the IFLM, subject to the limited changes necessary for its operation within an integrated approach.

More broadly, proponent-led method development should supplement rather than substitute for Government responsibility for maintaining a credible and sufficiently broad suite of ACCU methodologies for the farm sector. Where industry or individual proponents are expected to lead development, that work should be appropriately co-funded and supported. Industry should not be expected to develop entirely new methodologies and infrastructure at its own cost. Government remains responsible for ensuring methodology development reflects the full breadth of emissions reduction opportunities across Australian agriculture (i.e. not just sequestration focussed).

NFF urges the Department to progress the soil carbon module as quickly as practicable alongside the development and inclusion of additional modules including but not limited to grazing management, to deliver upon the genuinely integrated approach promised.

Please do not hesitate to contact Warwick Ragg, General Manager, Natural Resource Management, via e-mail: WRagg@nff.org.au in the first instance to progress this discussion.



National
Farmers
Federation

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NFF House
14-16 Brisbane Avenue
Barton ACT 2600

Locked Bag 9
Kingston ACT 2604

(02) 6269 5666
reception@nff.org.au
nff.org.au
