Avoided Re-clearing and Native Reforestation method

(Improved Avoided Clearing of Native Regrowth method EOI)

Stage 2 Discussion Paper

DELIVERING FOR QUEENSLAND

Queensland Government

Prepared by: Landscapes, Water and Natural Capital, Department of the Environment, Tourism Science and Innovation.

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Introduction

The current method proposal builds on the EOI submitted by the Queensland Department of the Environment, Tourism, Science and Innovation (DETSI) to the Commonwealth Government's Emissions Reduction Assurance Committee (ERAC) and prioritised by it for development in October 2024. The continued development of the method proposal has been informed by stakeholder feedback from engagement activities undertaken in early 2025.

The method proposal, as outlined in the draft method and workflow documents, includes activities of avoided re-clearing of native forest and sub-forest areas, as well as reforestation by assisted regeneration or plantings. Eligible land is generally land that has been comprehensively cleared by mechanical or chemical means for agricultural purposes, where we can be confident that, but for the carbon project, the land is likely to be re-cleared or remain clear into the future.

A summary of the key areas of stakeholder feedback, and the responses to this, are detailed below.

Notable changes or clarifications made to the method proposal since the EOI was submitted are also outlined, whether resulting from stakeholder feedback or to address issues as they have arisen during development of the draft method.

Following the current second round of stakeholder engagement undertaken by DETSI, method documents will be finalised and submitted to the ERAC for consideration. The ERAC must undertake a public consultation process as part of its role in providing advice to the Minister on whether the method proposal meets the Offsets Integrity Standards.

Anticipated Timeline

Activity	Status
Proponent-led method proposal submitted to ERAC for consideration	Completed
ERAC prioritised method proposal for development	Completed
Initial stakeholder feedback sought on method proposal	Completed – see Consultation feedback summary
Draft of method proposal incorporating stakeholder feedback	Completed – see Draft method
Draft guidance for project assessment and design	Completed – see Workflow and case study
Stakeholder engagement feedback sought on final proposal	Underway
Finalisation of documentation and presentation to ERAC	April 2026

Consultation feedback summary

Method specific feedback

TOPIC	PROPOSED ACTION
Native timber harvest opportunities Concerns raised about lack of selective timber harvesting included in the method activities, which may limit uptake and limit timber production.	Timber harvest is not within the scope of the DETSI method, as prioritised by ERAC. The addition of timber harvesting fundamentally changes the method, creating complexity in method design, management of additionality and uncertainty and likely additional costs in project administration.
Multi-activity/integrated option Broad support expressed for the option to include forest regeneration activities as well as avoided clearing. This approach will broaden uptake of the method and recognise the mosaic nature of farm landscapes and provide flexibility and efficiencies for farmers.	DETSI proposes to develop the method to include the additional activities proposed in the EOI. DETSI will continue to liaise with the Australian Government on any issues with the parallel development of the IFLM method.
Compressed crediting/extended crediting (100-year permanence) The proposal to front-end crediting as an incentive to undertake longer permanence period projects has had broadly negative feedback, based on perceived integrity risks, and potential risks arising from an extended period between the end of crediting and the end of permanence obligations. Additionally, feedback was received that compressed crediting would not be seen as an effective incentive.	Despite compressed crediting being available under other ACCU Scheme methods, DETSI proposes to remove this option in the next version of the method, on the basis that a perception of integrity risk is not desirable, and on feedback from farmers that this is unlikely to be an effective incentive. Instead, based on feedback, it is proposed to include an extended crediting period in the method to act as an incentive and reduce any risks associated with an extended gap between crediting and permanence periods.
50-year permanence period The method proposes 50- and 100-year permanence periods, in place of the usual 25- and 100-year permanence options. While this is required to maintain integrity when the eligibility criteria are being made more inclusive, it will also increase existing barriers associated with permanence periods in general. The inclusion of a 50-year permanence period will also require a change to the Carbon Farming Act.	A 25-year permanence period will be available for projects that do not include an avoided clearing component. The draft method specifies that projects that include avoided clearing will require a minimum 50-year permanence period, to manage additionality risks associated with confidence in the timing of future re-clearing in the counter-factual scenario.

Eligibility window for clearing The current proposal is that initial clearing must have occurred in the past 25 years, to provide some certainty that further re-clearing is likely. Submissions were received to both extend this period to 30 or more years to improve uptake, and to restrict it to 20 years to further reduce additionality risks.	It is proposed to maintain the 25-year limit to maintain the integrity of the method. It is acknowledged that a small number of landholders may not be eligible to use this method, where they may be planning to re-clear, and that a risk will always be present that land may be eligible where no further re-clearing is planned.
'Forest' and 'forest cover' definitions There has been confusion about potential changes to standard definitions of 'forest' and 'forest cover', and potential inconsistencies with other methods and national datasets.	The draft method clarifies the use of accepted definitions of forest and forest cover.
Scale for land assessment/stratification Clarification required about the purpose and usage of a defined scale to determine eligible project areas. Support for having a defined scale (previously absent) for clarity. Discussion about what the most appropriate scale should be.	Criteria have changed from 10x10m or 25x25m scale (in initial proposal) to 30x30m scale for assessing land that has been subject to historical clearing, to allow assessment without the need for additional spatial analysis tools and to recognise the resolution of historical imagery that may have to be relied on for evidence. Stratification of the project to be undertaken at 10x10m scale, as current imagery allows for this.
Using slope as a measure of risk of re-clearing The initial method proposal included a criterion that land must have a slope of less than 10% to be eligible for inclusion in a project. Slope can be strongly related to risk of re-clearing, although this can vary regionally. Stakeholders have noted regular clearing in areas that have a greater than 10% slope and have noted that the requirement to have a previous clearing event provides a reasonable mitigation of risks that land will not be re-cleared in the absence of a carbon project.	The slope-based criterion has been removed from the method proposal, as being difficult to apply appropriately in a national context. Eligibility criteria relating to evidence of recent prior clearing, with an associated unfettered right to re-clear are considered sufficient to mitigate integrity risks.
The use of fire within projects (incl. traditional burning) The initial method proposal did not provide sufficient information on the use of fire within projects and in relation to clearing eligibility	Fire used for management and cultural purposes will be allowed in project areas and will be required to be modelled in FullCAM. Biomass removals for indigenous cultural purposes will not be restrained.

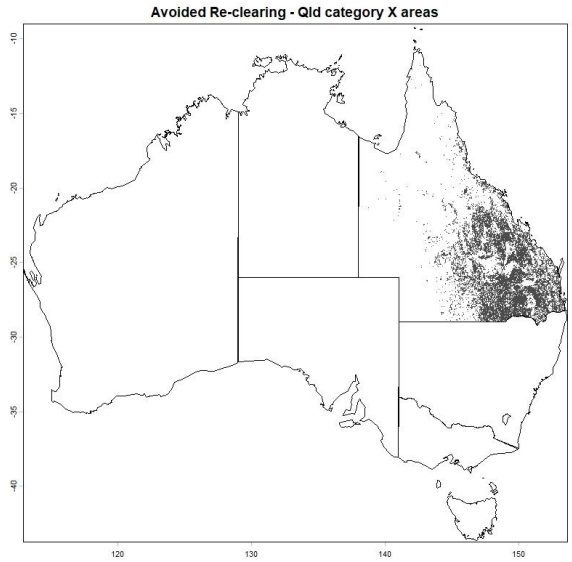
criteria, particularly from a First Nations perspective.	
Property management plans The initial proposal did not speak to a requirement for property management plans for projects. Some carbon methods rely on plans to mitigate against assumptions and uncertainties in methods. The Clean Energy Regulator may find plans useful in determining eligibility and providing agreement on on-going activities to maintain carbon outcomes. Local governments have a direct interest in biosecurity and would like to see strong outcomes and oversight in this area though the method and the ACCU Scheme more broadly.	A property plan is proposed for the method, which will include biosecurity management aspects. It is proposed that property plans be published, to provide transparency to local communities and improve understanding and support for carbon projects.
Native title rights and interests Limited intersect with lands with FN interests, therefore limited opportunities to lead and run projects. FPIC principles should apply. Provide clarity on rights to resources and cultural practices (such as fire). Continue engagement with native title representative bodies in areas where method is most likely to be applied.	Clarity provided about use of fire (including for cultural purposes) and removal of biomass for cultural purposes and native title rights. Further engagement proposed, including with representative bodies.

ACCU Scheme feedback

TOPIC	PROPOSED ACTION
Integrated Farm and Land Management (IFLM) method Varying views on the impacts of the DETSI method on the progression of the Aust. Govt's IFLM method. Concerns that resources will be diverted away from the IFLM method, that the DETSI method should or could be 'rolled into' the IFLM method. Other feedback is that the DETSI method should stand alone. Guidance for proponents would be useful if both methods are made with some overlap. Concern that if this method is rolled into IFLM, it must maintain its current low barrier to entry for landholders/producers.	DETSI is in regular communication with the Australian Government on the parallel progression of these methods. No additional action proposed at this stage.
Scheme Rules that make viable projects ineligible A legislated Rule in the Scheme may vegetation projects being registered if clearing has occurred in the prior 7 years. This is to reduce the risk of clearing being incentivised by a carbon method. Where clearing is happening cyclically, this could rule out projects that should otherwise be eligible and can demonstrate that clearing was not incentivised by the Scheme.	Clarity provided by the Clean Energy Regulator that this Rule would generally not apply to re-clearing events that occur after a prior/initial clearing of native forest for avoided clearing projects.
Stewardship support The method provides an opportunity to support stewardship, however support should be available to farmers to allow them to enter into carbon farming projects, including co-funding and 'top-up' payments, especially where there are longer permanence periods.	No action proposed in relation to the method development process.

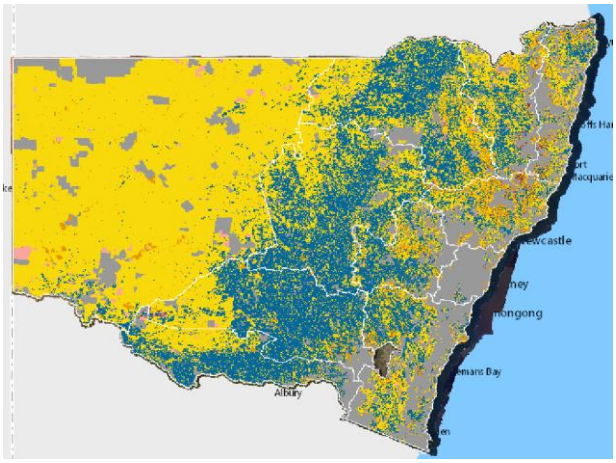
Potential applicable areas for method

Avoided Clearing - Queensland



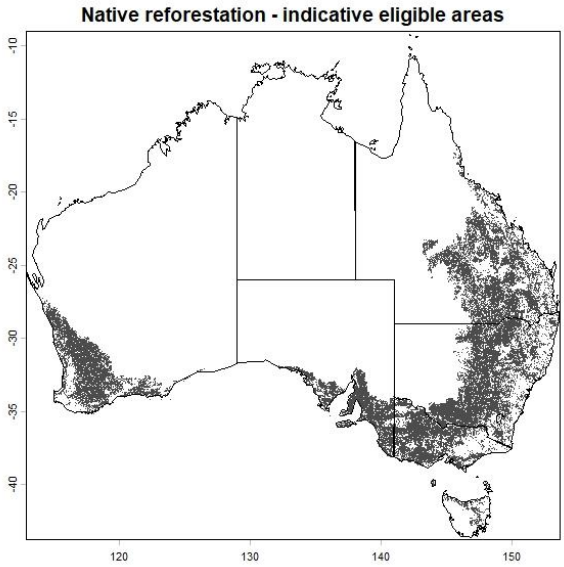
Grey areas are Category X land where an unrestricted right to clear exists

Avoided Clearing – New South Wales



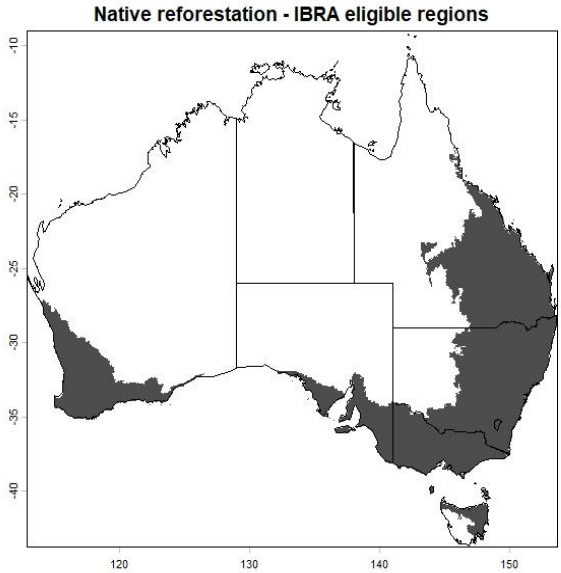
Blue areas show Category 1 (exempt) land, where an unrestricted right to clear exists

Native Reforestation



Grey areas show land this is predominantly cleared within the eligible IBRA subregions (see below)

Native Reforestation – IBRA eligible subregions



Grey areas show land within the eligible IBRA subregions specified in the method. Note: these are the same eligible subregions specified in the Nature Repair Market's Enhanced Native Vegetation method proposal and its Replanting Native Forest and Woodland Ecosystems method.

Summary of significant changes and developments

TOPIC	CONSIDERATIONS	OUTCOME
Compressed crediting option for 100-year projects	Integrity, strength of incentive, permanence gap.	Removed compressed crediting, proposing 50-year crediting period (subject to continued unrestricted right to clear at year 25).
50-year permanence	Uptake, additionality.	25-years for reforestation, maintain 50 years for avoided re-clearing.
Assessment scale	Availability of imagery at suitable resolution, use of products to re-scale native resolution.	Adopt 30x30m for evidence of historical clearing, adopt 10x10m scale for stratification of project.
Slope	Regional variability, confidence in other eligibility criteria.	Remove slope as an additional eligibility criterion.
Sub-forest re-clearing	Comprehensiveness of method, additionality, confidence in counterfactual. Rationale counterfactual of re-clearing of 'advanced' regrowth – could be argued to be unlikely if unfettered right to clear not in place.	Where canopy cover is between 10-20%, adopt an avoided clearing eligibility model (must demonstrate an unrestricted right to re-clear).
Ecological thinning (all CEA types)	Clarity, fit-for-purpose.	Once only, crown cover must be >30%, not be reduced to <30%, not reduce to <75% expected crown cover of reference ecosystem. To be modelled in FullCAM for regen CEAs.
Standardised crediting for AC projects	Not disincentivising projects where land has been most-recently cleared (therefore highest confidence in additionality), remove flawed assumption that re-clearing on a property occurs at regular intervals, easier to predict financial outcomes to make decisions.	Crediting approach will be standard for all projects, assuming an average 15-year clearing cycle in the baseline and crediting a project as though it commenced at the point where the project land had intersected with the baseline carbon stock. Acknowledging the additional confidence in outcomes that result from

		projects with 50+ years permanence, disturbances are not required to be modelled, meaning that projects that are meeting gateways will have certainty of crediting over the crediting period.
Defining eligible sub-regions for reforestation	Areas that have experienced historical widespread clearing for agriculture. The purpose of this is to further reduce risks that historical clearing has not been associated with on-going agricultural use that supports the counterfactual argument that land will remain cleared but for the carbon project.	Defined bioregional sub-regions for eligibility. Aligned with proposed Enhanced Native Vegetation Nature Repair method proposal and existing Replanting Native Forest and Woodland Ecosystems method.

Grazing restrictions

There are no specified restrictions to grazing within the method, other than that risks to the project from grazing must be 'mitigated'. Practically, this means that grazing will need to be managed in a way that allows the project to meet gateway requirements. Any changes to grazing management will be specific to a project's unique situation, and as they are not required to be detailed in the project plan, adaptive management of grazing will not lead to any administrative burden.

50 years permanence

For projects that include an avoided clearing CEA, the method specifies a permanence period of 50 years or more, to ensure clear additionality where project areas may not have been cleared for 25 years (i.e. could be argued to be subject to a 25-year clearing or similar 'clearing cycle'). If no Act change is able to be made prior to or concurrent with the method being made, projects with an avoided clearing CEA will only be possible with a 100-year permanence period at the commencement of the method. It is noted that the nature repair scheme is considering a 50-year permanence period option for the proposed Enhanced Native Vegetation method, which appears to be complementary to this carbon method proposal.

Extended crediting period/compressed crediting

The proposal to use optional compressed crediting as an incentive for avoided clearing projects to adopt a 100-year permanence period has been removed. Feedback on this proposal was that it had a perceived integrity issue (forward crediting), would exacerbate an existing issue with long post-crediting permanence periods, and would not be likely to prove a strong incentive to landholders. It was suggested that a more effective incentive, that does not have the associated issues, would be to extend the crediting period. The current proposal is for a 50-year crediting period for avoided clearing projects with a 100-year permanence period, subject to an on-going unrestricted right to clear at the 25-year point.

Slope-based eligibility criterion

The current proposal has no slope-based eligibility criterion for avoided clearing activities. We received feedback that clearing on slopes over 10% was common in certain regions, whether due to topography and/or the type of livestock being managed. The eligibility criteria to demonstrate a prior, recent clearing history and a continuing unrestricted right to clear (which would include consideration of any slope restrictions in State legislation or clearing codes) is considered to sufficiently manage additionality risk for avoided clearing.

'Deeming' criteria for reforestation CEAs

For reforestation CEAs land is *deemed* to meet the eligibility criterion of having been comprehensively cleared for agriculture if the following criteria can be met:

- There is evidence that the land was used for an agricultural purpose in the 50 years prior (including through government land use mapping)
- The land meets reference ecosystem criteria
- The land has not been subject to a recent natural disturbance event that would explain the absence of native trees.

Alternatively, clearing can be demonstrated more directly through other forms of evidence, such as imagery.

Note: for avoided clearing CEAs, you will need to demonstrate a comprehensive clearing event within the prior 25 years.

Standardised crediting for avoided clearing CEAs

Avoided clearing CEAs will be crediting according to FullCAM modelling, and not be influenced by the date of most recent clearing relative to the project registration date. This approach removes relative disincentives for projects with a recent clearing history (those that are arguably at the lowest risk of being non-additional), through lower initial crediting when compared to projects with a longer period to the most recent clearing event. The model provides more certainty of the credits to be issued from a project that is meeting gateway requirements, which should assist with landholder's ability to weigh up risks and returns in when making business decisions.

This approach is considered suitable given the relative confidence of carbon abatement outcomes with avoided clearing projects, especially where there is a minimum 50-year permanence period.

This model also provides a more consistent spread of crediting for projects that have not been cleared for longer periods (more credits in the mid- and latter periods of the project) when compared with the previous method, which addresses concerns we heard about the compressed crediting option.

Demonstrating a comprehensive clearing event

Proponents will need to show that the area has been subject to clearing at some point during the last 25 years. Given standardised modelling, the exact date is not critical, and more gradual clearing processes, such as might occur with chemical clearing, is able to be captured more simply.

Evidence will need to be provided to show that eligible comprehensive clearing took place that was directly responsible for the land meeting the eligibility criteria, such that the canopy of any remaining trees that survive the event cover no more than 10% of the land.

Stratification scale – 30x30 and 10x10

Eligibility areas for avoided clearing projects (area with eligible comprehensive clearing) will be required to be defined at a 30m x 30m cell size, which allows for the native resolution of publicly available satellite imagery for the entire eligibility period. Stratification of CEAs will be required to be undertaken at a 10m x 10m cell size, again reflecting the resolution of current publicly available imagery.

Avoided clearing in Queensland – Category X and PMAVs

All Category X land in Queensland is potentially eligible land for avoided clearing CEAs. The existence or lack of a Property Map of Assessable Vegetation (PMAV) is not relevant to the initial determination of eligible land. However, with the proposal for a 50-year crediting period for avoided clearing projects comes a requirement to demonstrate an on-going unrestricted right to clear at the 25-year point of the project. Landholders should consider the benefits that a PMAV might deliver in meeting this criterion.

Avoided clearing in New South Wales

It is anticipated that Category 1 land shown in the NSW draft native vegetation regulatory map will generally meet the criterion for having an unrestricted right to clear for avoided clearing projects.

25-year permanence for non-AC projects

If there are no avoided forest re-clearing CEAs within a project, the project is eligible for 25- or 100-year permanence periods.

Clearing within 7 years of application (CFI Rule 20AA)

For avoided clearing CEAs, re-clearing within the 7 years prior to the project application will not make the project an excluded project under the CFI Rule. The project would still be potentially eligible if prior comprehensive clearing can be demonstrated within the past 25 years.

Traditional burning

Burning practices will be allowed within project areas and will need to be modelled in FullCAM to account for their impact on carbon emissions and stocks.

Fire management

Fire management for hazard reduction will be allowed within project areas and will need to be modelled in FullCAM. Biomass removals (e.g. of debris) for fire management will not be allowed. It is suggested that fire management areas surrounding infrastructure and other fire breaks be excluded from project areas, to allow clearing and removal of debris as required.

Native Title Rights

Biomass removals associated with native title and cultural uses will be allowed within project areas. Traditional burning will be allowed and will need to be modelled in FullCAM.

Ecological thinning

As in other methods, ecological thinning will be allowed, but clarification is provided to ensure carbon and ecological outcomes are maintained. Criteria are set to put some reasonable boundaries around the process, including:

- Ecological thinning may occur only once on any area of land
- The area must have a minimum crown over 30% (i.e. potential that thickening has occurred)
- Constraints on amount of thinning – not reduce the vegetation to below 30% crown cover, not reduce the vegetation to below 75% of crown cover of its reference ecosystem (maintains ecological integrity and continued carbon sequestration).

Direct measurement or Biomass Surveys

Provisions for direct measurement by biomass surveys are detailed within the method. This process is optional for avoided clearing CEAs only, where there can be some reasonable measure of biomass increase over a reasonable period. This process will allow more accurate crediting in those areas where a proponent believes that FullCAM is under-estimating abatement.

Project Plan

The method requires the development and maintenance of a project plan. The project plan will be required to be published. Proponents will be required to implement the project plan, and amendments to the project plan must be submitted to the Regulator.

Biosecurity planning

The project plan will require the proponent to detail how biosecurity risks that are, or could reasonably associated with the land will be managed. This includes risks to the environment, human health and interest of surrounding landholders. The project plan must detail how biosecurity actions will both meet biosecurity laws and align with relevant biosecurity plans, including those at the local or regional level. As part of the project plan, this information will be required to be published.

Gateway requirements

Gateway requirements have been included in the method, to ensure that projects are progressing appropriately, while allowing a high degree of flexibility for landholders in determining land management practices appropriate for their land and circumstances.

For native reforestation CEAs, land must show continued progression to achieving forest cover by the 12th year of the project.

For avoided forest re-clearing CEAs, land must not show a decline in forest cover of more than 5% from the initial cover, in absolute terms, over a 21-year period.

Reference ecosystems

Reference ecosystems for native reforestation CEAs have attributes that exceed the minimum attributes for a forest. This is to provide greater certainty that the land will consistently regenerate to forest cover during the life of the project. As such, reference ecosystems must have trees that are generally expected to reach 5m in height and to be likely to achieve at least 25% cover. This criterion reduces the risk that projects will fail to reach forest cover, due to less-than-ideal conditions or shorter (25 year) permanence periods.

Reforestation CEAs limited to specific sub-regions

By limiting the method's application to areas of that have experienced widespread historical land clearing, additionality risks are reduced, as we can have confidence that the land was cleared for agriculture and would be subject to on-going suppression of vegetation in the future.

Mixed regeneration and plantings CEAs

CEAs that have a reasonably equal mix of plantings and regeneration (that is, between 100 and 399 trees per hectare) will be credited using a maximum growth (G) value in FullCAM that is the average of the plantings only and regeneration only G values.

Native reforestation CEAs with less than 100 trees per hectare will be treated as regeneration CEAs, while this with 400 trees per hectare or more will be treated as plantings CEAs.

Questions for consideration

Do you support the rationale and process for the extended (50-year) crediting period proposal for avoided clearing projects? Are there any risks with this approach that could be managed differently? Does the approach to recheck the unrestricted right to clear at the 25-year point adequately manage risks of additionality changing over time?

The current proposal for standardised crediting commences crediting as though the project carbon stocks were at the baseline level at registration (i.e. no 'up-front' crediting for existing stocks above the baseline). Should this approach be altered to provide some initial crediting at project registration, as was typically the case under the previous avoided clearing method? If so, how could this be done to both maintain the standardised approach and maintain integrity?

For consistency, could the standardised crediting approach proposed for avoided clearing projects be applied to reforestation projects in a manner that meets integrity standards? If so, should it be limited to projects with a minimum 50-year permanence period, to provide greater certainty of outcomes? Would any additional safeguards need to be put in place to manage the greater uncertainty in regeneration projects?

Is the approach of averaging maximum growth (G) values in mixed plantings and regeneration CEAs reasonable? Is it likely to lead to any integrity issues, such as over-crediting? If so, how could this be resolved? Are existing conservativeness measures adequate to manage any inaccuracy?

Should the types of evidence to be used for demonstrating eligibility and stratifying CEAs be specified, for instance, via a list of approved derived spatial datasets/products? For instance, the 'persistent green' dataset? IF so, what criteria should be applied to approving a particular derived dataset?

Similarly to the question above, would there be a benefit in having defined or approved systems for identifying reference ecosystems?

Contact us

Contact us at natural.capital@detsi.qld.gov.au

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