

BIDCARBON™

*Guidance for meeting the
requirements of land management
strategies for PyCCS projects*

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This document outlines the key requirements for submitting land management strategies (LMS) for soil carbon projects registered under the BidCarbon (Pyrogenic Carbon Capture and Storage in Agricultural Systems) Methodology and Data Asset (PyCCS method), and the Technical Governance Committee's (the TGC) guidance on meeting these requirements.

This document (LMS) provides a framework for assessing biochar potential without compromising business objectives, while accounting for cross-factor interactions across land use, climate, and environment.

A LMS must identify at least one eligible management activity. The method requires the LMS to be prepared or reviewed by someone with appropriate knowledge of agronomy, plant nutrition and soil carbon, and experience in providing agricultural production advice. Land management strategies are required to be submitted when projects register, when new areas are added to a project, and when projects transfer to the PyCCS method from other standard biochar methods.

Elements of a LMS could be used across multiple projects, provided that project specific information is included where appropriate. Multiple LMSs may apply to a project where new areas have been added to the project over time (see guidance for subsection 24.(4)).

The LMS can also be used to explain to the TGC the actions taken or to be taken by project proponents (or ensured by them to be taken by landholders) to protect the carbon credited to their project.

A LMS needs to be revised:

- at least once every 5 years or more frequently; and
- if land management activities being conducted change materially from those outlined in the land management strategy; and
- if the Working Body notifies a project proponent that a particular issue needs to be addressed in the strategy—by the date specified in the notification (which must be at least 3 months from the date of the notification).

Table 1: Key method requirements for land management strategies:

| Method LMS Requirement | Guidance on demonstrating this in an LMS |
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Paragraph 24.(1)(b) The LMS includes information which demonstrates that for all land included, or to be included, in a carbon estimation area, includes the carrying out or maintenance of at least one eligible management activity until the end of the reporting period for the project

- The LMS must be clear that at least one new or materially different eligible management activity will be carried out or maintained on all land included in a CEA for the end of the reporting period for the project.
- This should include consideration of the extent to which the new or materially different activities need to be carried out in order to exceed baseline activities and be valid.
- If you wish you cease your eligible management activity at any stage during the permanence period, it must be replaced with a new eligible land management activity. Such a change must be documented in a revised LMS and communicated to the TGC. If you are required to revise your LMS, you must notify the TGC within 60 days and provide a your revised or new LMS to the TGC within 9 months.

Paragraph 24.(1)(c) The LMS includes information which demonstrates that;

- (i) all the eligible management activities and other land management activities that will be conducted on the land
- (ii) the limitations on increasing application of biochar within each carbon estimation area
- (iii) risks to soil carbon stocks from environmental factors and the land management activities being carried out

- The LMS must take into account any other activities being conducted on the farm and environmental factors that may be incompatible with biochar application.
- The LMS must also take into account any other activities being conducted on the farm and environmental factors that may risk reversing stored biochar carbon stocks. For example, changes in rainfall and temperature which may impact the project area.
- If parts of the LMS are used across properties, the LMS should also take into account the constraints to its effectiveness across geographical locations (applicable rainfall zones and soil types etc.). If there are no such constraints, this should be explicitly stated in the LMS to ensure that limitations have been considered in the preparation of the strategy.
- These considerations are intended to ensure that the landholder is aware of the range of possible limiting factors and risks, particularly those related to management activities.

Subparagraph 24.(1)(e)(i) The LMS includes a statement confirming that activities excluded by section 22, or in breach of section 23, are not being conducted or proposed to be conducted

It is best practice for the LMS to include a list of each of the restricted/prohibited activities outlined in section 22 and section 23 of the method, followed by a statement from the project proponent confirming that they are aware of their obligations to act consistently with each of the requirements of section 22 and section 23, and that the activities excluded by section 22 and in breach of section 23 are not being conducted or proposed to be conducted.

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| <p>Paragraph 24.(1)(c) The LMS specifies:</p> <ul style="list-style-type: none"> (i) if the project proponent intends to use AQS biochar and/or products containing human effluent as part of their project (ii) the steps the project proponent needs to take in order to monitor the project's progress (iii) the records the project proponent needs to keep relating to land management activities to verify that the overall objectives of the land management strategy are being achieved | <ul style="list-style-type: none"> • The LMS must include a statement confirming whether the project proponent is intending to use AQS biochar and/or products containing human effluent as part of their project. The TGC requires this information because use of these products may have associated risks, such as work, health and safety risks. • The LMS should outline the steps and key metrics for which monitoring activities and records are required in order to demonstrate that management activities are being conducted to the extent necessary. • The LMS should specify any particular records which may be necessary to demonstrate that the overall objectives of the land management strategy are being met. • For example, if grazing practices are changed, records of numbers of stock and length of time spent in CEAs need to be kept. |
| <p>Subsection 24.(2) The LMS must:</p> <ul style="list-style-type: none"> (a) cover all of the land included in the CEAs for the project; and (b) cover all of the land in a given CEA in a single strategy | <ul style="list-style-type: none"> • All land included in CEAs for a project must be included in the LMS/LMSs for that project. • All land in a given CEA must be included in a single LMS. • It is recognised that CEA boundaries may not be finalised when an LMS is initially submitted. • Nonetheless, it is advisable for the strategies to be explicitly applicable to any CEAs within the project area that are likely to be stratified to avoid the need to re-submit an LMS every time a new CEA is added. |
| <p>Subsection 24.(3) The initial LMS for the project must be prepared:</p> <ul style="list-style-type: none"> (a) if this determination is the applicable methodology determination as a result of a 99 application—before the first offsets report submitted after that application; or (b) otherwise—before the section 22 application. | <ul style="list-style-type: none"> • The LMS should be consistent with the information provided with the project's original registration application (unless the land management activities being conducted have or will change materially), particularly in terms of the information used to demonstrate that the management activities being conducted were new or materially different. • In all other circumstances, the initial LMS must be prepared prior to a project registration application under section 22 of the BidCarbon (Carbon Farming) Standard 2025 (The Carbon Farming Standard). |

Subsection 24.(4) If a project area is added to the project or land is added to a project area of the project as a result of a section 29 application:

- (a) one or more existing land management strategies must be revised to cover the additional land or project area before making the section 29 application; or
- (b) one or more new land management strategies must be prepared to cover the additional land or project area before making the section 29 application.

If new areas are added to a project as a result of a project variation application under section 29 of the Carbon Farming Standard, project proponents must either revise their LMS to include the new area before the section 29 application, or, prepare a new LMS that covers the new area before the section 29 application.

Subsection 24.(5) The project proponent and each relevant landholder must provide a signed statement that they have read each of the land management strategies and agree to implement, or oversee the implementation of, each land management strategy.

- The LMS must include a signed statement from the project proponent and each relevant landholder* confirming that they have read the LMS (or where more than one LMS applies to a project, each LMS), and agree to implement or oversee the implementation of the LMS/each LMS.
- If an LMS has identified particular conditions that must be met for the strategy to be effective, the LMS should include statements and evidence from the project proponent that these conditions are being met.
- Evidence could take the form of a supplement to the LMS.

*a relevant landholder is any person other than the project proponent who, whether by reason of ownership or otherwise, is in lawful occupation or possession, or has lawful management or control, of land that is covered by the LMS.

Subsection 24.(6) A qualified person must review, and if necessary, revise each strategy:

- (a) at least once every 5 years or more frequently; and
- (b) if land management activities being conducted change materially from those outlined in the land management strategy; and
- (c) if the Working Body notifies a project proponent that a particular issue needs to be addressed in the strategy—by the date specified in the notification (which must be at least 3 months from the date of the notification).

- The LMS needs to be reviewed and if necessary, revised every 5 years or more frequently.
- If at any stage of the project the management activities being conducted change materially from those outlined in the LMS, the LMS must be revised.
- Developments in the project that have resulted in any inconsistencies should be addressed in the LMS to ensure that new or materially different eligible management activities continue to be carried out.
- If you are required to revise your LMS, you must notify the TGC within 60 days and provide a your revised or new LMS to the TGC within 9 months.
- If the TGC identifies a particular issue with an LMS that needs to be addressed and notifies the project proponent, the revised LMS must be provided before the date specified by the TGC.

Subsection 24.(7) In providing a notification under paragraph (6)(c), the Regulator must take into account whether the carrying out of the activities outlined in the land management strategy could reasonably be expected to result in the crediting of non-genuine carbon abatement

This requirement applies to the TGC.