

Internal Review of KCT Biochar Credit Class

Date: 10.18.2022

Reviewers: Sam Bennetts

Summary of Internal Review Process

The intent of the Credit Class Review is to ensure the draft submitted to the Regen Registry meets the integrity expected by our community and, if desired, ensure the document is sufficient to warrant review by Expert Peer Reviewers. The task of an Internal Reviewer is to act as an ally to Credit Class developers by providing critical feedback to help facilitate an understanding of how to improve the Credit Class to best serve Earth Stewards while maintaining scientific and community integrity.

The Regen Network Science Team has reviewed the [KCT Biochar Credit Class](#). Our feedback has been provided in two ways:

- 1) **Direct Comments:** To provide targeted constructive feedback to specific sections of your Credit Class, our team commented directly in your document on what we found confusing, thought needed more definition, or what we thought was out of scope for this methodology.
- 2) **Overall Reflections:** To provide more generalized feedback to your Credit Class as a whole, our team provided the additional reflections in this document. Reflections were categorized by reviewers. A final combined summary of comments, feedback and suggestions is found in the Combined Summary section.

Internal Review:

Reviewer 1 - Ned Horning:

General Comments:

This is well written and concise. I didn't address issues that were highlighted in yellow. Those would be best addressed by someone more familiar with our carbon registry constraints. I browsed the Definitions section and it looks good but I didn't check to see if they are in tight agreement with the definitions in the Registry Guide.

Comments by Sections: *Reviewer please note section name with comments*

My comments are primarily inline. In the document.

One issue that came up for me is how we deal with buffer pools. Is a buffer pool tied to a project, a project proponent, a credit class or something else. If the buffer pool is quite broad, how is fungibility dealt with? My understanding is that credits are only fungible at the credit batch level and I expect most buffer pools will have credits from multiple batches. If this isn't defined and described it should be.

Final Decision: - Pass or Suggested for another round of Internal Review

Reviewer 2 - Gisel Booman:

General Comments:

Clear and well written, I would focus on the sections highlighted by Ned along with the Registry team.

Comments by Sections: *Reviewer please note section name with comments*

No comments except for one in the Grouping Projects section, probably there's one bullet missing about spatial boundaries for grouping.

Final Decision: - Pass or Suggested for another round of Internal Review

Some advice and revision from the Registry team required.

Internal Comments