Internal Review of Credit Class

Date: January 26, 2023
Reviewers: Ned Horning, Gisel Booman, Sam Bennetts, Tica Lubin

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 *GHG Benefits in Managed Crop and Grassland Systems 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 - Sam Bennetts:

General Comments:

Great job! Overall I think this credit class could use a bit more specificity on the rules and requirements on the process projects need to follow to register and what should be reported at different stages (project registration, verification, etc…). I indicated those sections in my comments.

Comments by Section

Section 3.3 - Project Activity

I think this section is good, but could benefit from added specificity on what deems a project activity eligible under your program. In other words, when a project is registering with you what do they need to submit to prove they are currently implementing one of these practices or intend to. Are they land management records? If so, what's the format?

Section 3.3 - Land Ownership Type

I think you can probably replace what you have with outlining the requirements to prove land ownership or tenure, something like "This credit class accepts any project which can properly demonstrate adequate documentation of land ownership and approval by landowners."

Section 3.4. - Adoption Date

I think this section is well outlined. Do you have any more specification on the type of historical records which would be needed for lookback projects (ie those which have a historical adoption date)? Do they need to show land management records demonstrating they have been practicing regenerative practice? Soil samples, and if so how many? Does the landowner have to be the same? Then in terms of the evidence how should they report it?

Section 3.?. - Regulatory Compliance

This is a section which doesn't currently exist, but should.

This section should specify any checks projects must go through to ensure that their implementation and ability to make carbon claims adhere to any local laws, regulations, and other legally binding mandates directly related to Project Activities and participation in voluntary carbon markets.

You can either be specific with what these requirements are, or just state that the, "The Project Area has to adhere and provide attestation of compliance to the local laws,regulations, and other legally binding mandates directly related to Project Activities as presented in the Methodology."

This is important to include, I think, as it shows buyers and other stakeholders that you are evaluating project risk within the context of the political climate in the countries these projects are run.

Section 3.?. - Geographic Applicability

This is a section which doesn't currently exist, and might not be needed, but is worth considering.

"Geographic Applicability" indicates where in the world this credit class can be applied. My questions to you are:
- Are there bioregions / countries where this credit class cannot be applied? Is this specific to pantropical ecosystems? If so I would specify where this credit class can be used.

Section 3.?. - Land Eligibility

This section doesn't currently exist in your credit class, but it should. The purpose of this section is to outline the eligibility requirements for land which would be eligible for enrollment in this program, as there are likely prospective projects which shouldn't. For instance projects run on land which was previously wetlands or native forest are oftentimes excluded in traditional registry systems as they want to deter removal of native ecosystems to make money via the carbon market.

With this in mind, please specify the land types which are eligible or not eligible to use this program.

Section 4.2 - Aggregate Projects

This section doesn't currently exist but probably should. If you aren't allowing for aggregate projects you can just say that. If you do intend to run aggregate projects it would be important to include specific requirements on how they should be handled.

To dive in a bit more to the requirements, I would separate out project aggregation requirements into two main categories: eligibility requirements for project aggregation stored in the credit class, and monitoring requirements for project aggregation stored in the methodology.

As far as I understand (and correct me if I'm wrong), the type of aggregate project you guys would implement (if you do intend to) is what CAR defines as an *aggregated project* (as opposed to a *project aggregate*)[1] , meaning that you would register a single project which would encompass many plots of land which would collectively share data for MRV and split credits associated with the project. With that in mind, your credit class should specify the applicability conditions/requirements that projects must meet to register as an aggregate. It could read something as follows:

> *"Aggregate projects can be defined as, [insert definition as specified above]. Project aggregation allows [insert explanation of benefits].*
>
> *This credit class allows for multiple farms to register together as an aggregate project if the following applicability conditions are met:*
> - *Farms have similar conditions (soil and agroforestry management, for example),*
> - *Farms are geographically located in the same geographical bioregion*
> - *Farms share the same phytophysiognomy & management practice*
> - *[insert any other requirements]*
>
> *The requirements above ensure differences in carbon content in different farms can be scientifically explained by differences in the fact they share areas have different climate and soil characteristics.*
>
> *To register as an aggregate project, the Project Proponent must submit a report proving that the above applicability conditions have been met as part of the Project Plan. The report should include:*
> - *[Insert requirements and recommendations on how they can prove it (i.e. farm management data, soil reports, etc…)]*

[1] Climate Action Reserve. (December 18, 2019). Project aggregates and cooperatives help reduce cost and increase efficiency.
https://www.climateactionreserve.org/blog/2019/12/18/project-aggregates-and-cooperatives-help-reduce-cost-and-increase-efficiency/

As it relates to the methodology you should specify what the monitoring process should be for aggregate projects and how it should be reported. Should it be that,

1. Farms individually collect data, run individual models to calculate carbon sequestration, and generate a single or shared report. Or,
2. Data is aggregated across all the farms to run a single model and produce a single report

In terms of updating the method, I don't think this needs to be included now as it's already gone through peer review. But in the future we can add it if/when you decide to start running aggregates.

Section ? - Verification Requirements

In this section you should specify exactly what the requirements verifiers must follow to audit a monitoring report. I think this should contain two main elements:

- Verifier Requirements: Please specify the credentials verifiers must have. Do they need to have an ISO-14064 certification? If not, what credentials should they have? We specify in our Program Guide that they can have a range of certifications so just providing the specificity on what those requirements are in your context would be nice to share.
- Section 8.2 - Verifier Responsibilities: Please specify what type of audit the verifier should conduct (desk audit, field audit, or combination) and a list of specific things they should be checking for. We include a lot of this in the [Regen Registry Program Guide](#) which you can reference (no need to copy/paste it all), but anything specific to your method/credit class should be specified. Note that the more specific you are, the easier it is for a verifier to understand their responsibilities which helps reduce cost (if they're changing hourly).

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

Combined Summary/Feedback/Suggestions

General Comments:

Once comments in this document and the inline comments are returned to Regen and we check that they are addressed this credit class is complete.