

# **GHG Benefits in Managed Crop and Grassland Systems**

## **Credit Class**

### **-Credit Class Review-**

Internal R1

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<b>CONTENT referenced by reviewer's comment</b> <i>e.g. Section number + paste exact text</i>	<b>REVIEWER'S COMMENT</b> <i>Please paste the comment from the reviewer</i>	<b>AUTHOR'S RESPONSE</b> <i>Please describe how the comment was addressed and include new content in quotations</i>	<b>Reviewer's Conclusion</b> [PASSED/ REJECTED WITH COMMENTS]
2. Carbon Sequestration	I would add "and Storage"	"And storage" added	PASSED

2. 1 - "atmospheric regulation through"	I'm not sure this is necessary.	Left in for context as climate change mitigation is the primary driver.	PASSED
2.1 - "increased"	Are you interested in a change in fertilizer use or "emissions sources attributable to the project activity"?	Sentence referencing fertilizer use deleted to limit paragraph to GHG emissions directly resulting from the project activity.	PASSED
2.2 - Author note: Should we include Provisioning Service - Food; Regulating and Maintenance Services of - Water Regulation (cover cropping), water purification (reduced inputs and cover / companion crops); Habitat Maintenance - (soil quality and biodiversity increased through minimising tillage, maintaining green cover and using diverse cover/companion/catch crop mixes to positively influence soil structure)	Regen Response - "If these services are added, it should be clear these are expected outcomes since at this time, no monitoring is done to verify the impact on these services."	Services left out until such time as metrics are developed to quantify these outcomes.	PASSED
Need - Project Activity, Land Ownership and Adoption Date Addressed	Add in - 3. Conditions for Applicability Conditions which make a piece of land eligible for enrollment in this program. Outline specifics requirements for how projects	<b>Section added:</b> <b>2. Conditions for Applicability</b> To protect biodiverse natural habitats, any Project Area where a change of	PASSED

	<p>should prove applicable conditions and what needs to be reported during registration as part of the project plan. This could include geographic restrictions</p> <p>Outline the eligibility requirements for land which would be eligible for enrollment in this program. For instance projects which previously were wetlands or native forest which got removed recently should be excluded as it indicates that land stewards could have potentially removed native ecosystems to make money via the carbon market.</p>	<p>ecosystem type from Forest/Woodlands: Temperate or Tropical, or Wetlands, to Grassland, Pastureland, Cropland or Agroforestry as defined in the RND Taxonomy, within the 5 years prior to project start date, will be excluded from this credit class. Proof of land use for a 5-year period preceding project registration will be provided in the Project Plan and evidenced by farm-management records.</p>	
Need Regulatory Compliance Addressed -	<p>Add in: 4. Regulatory Compliance</p> <p>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.</p>	<p><b>Section Added:</b></p> <p><b>6. Regulatory Compliance</b></p> <p>Projects must maintain material regulatory compliance that is adherent to all laws, regulations, and other legally binding mandates related to Project Activities.</p> <ol style="list-style-type: none"> <li>1. Project Proponent is required to provide a regulatory compliance attestation for each verification.</li> </ol>	PASSED

	<p>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 applied and approved methodology."</p>	<p>This attestation must disclose all violations or other instances of non-compliance with laws, regulations, or other legally binding mandates directly related to project activities.</p> <p>2. Regen Registry retains discretion to decide on a case by case basis whether a violation requires cancelling the project or putting it on hold until the issue is addressed.</p>	
Frequency of Credit Issuance	<p>A credit class must define the frequency of credit issuance during the crediting term</p> <p>A credit class must define the number of years in a renewal time period. There is no limit to the number of renewals on Regen Registry.</p> <p>The project duration does not include the Permanence obligation of Regen Registry, which is additional.</p>	<p><b>Section added:</b></p> <p><b>9. Frequency of Credit issuance</b></p> <p>The frequency of credit issuance will be determined by the minimum time interval where SOC gains are measurable, with a maximum frequency of annual.</p>	PASSED
Section 4.1 - Approved Methodology	<p>Add in - The credit class admin will update this list as new methodologies are added.</p>	<p><b>1. Approved Methodology</b></p> <p>The approved methodologies for this Credit Class are:</p> <p>Methodology for Soil Organic Carbon Estimation in Regenerative Cropping</p>	PASSED

		and Managed Grassland Ecosystems <sup>1</sup> . The Credit Class Admin will update this list as new methodologies are added.	
Section 4.7 - approved methodology - aggregate projects	<p>Requirements for project aggregation can be broadly classified into two categories: eligibility requirements and monitoring requirements. Eligibility requirements refer to the conditions that must be met for multiple plots of land to enroll as an aggregated project. Monitoring requirements refer to the guidelines that aggregated projects must follow during reporting periods. Eligibility requirements should be stored in the credit class; monitoring requirements should be stored in the methodology.</p> <p>The credit class should contain high-level summaries or programmatic requirements aggregate projects should follow whereas the methodology should specify implementation requirements (ie how to measure, aggregate data, and</p>	<p>Section added:</p> <p><b>2. Aggregate Projects</b></p> <p>The aggregation of multiple Project Areas into a single Aggregate Project is permitted in this credit class. The benefit of an Aggregated Project will be Project Management administration and cost efficiencies and the pooling of larger volumes of credits to meet corporate buyer requirements.</p> <p>Project Areas will be grouped primarily by geographic bioregion but also accounting for similar soil conditions, management practices and crop types, which will be specifically pre-defined and checked for each Project Area and recorded in each Aggregate Project Plan. Component farms within aggregated projects will remain individually identifiable to allow verifiers to select farms with the strongest influence over an Aggregated Project's outcomes for site visits and, to ensure differences in sequestration rates and</p>	<p><i>PASSED with comments - for geographic bioregion it might be nice to specify what scale you consider bioregional (i.e. something like as classified in the Koppen Climate Classification)</i></p>

<sup>1</sup> [Soil Organic Carbon Estimation in Regenerative Cropping & Managed Grassland Ecosystems - Regen Library](#)

	report).	<p>quantities are identifiable and can be individually explained.</p> <p>To register an Aggregate Project, the Project Proponent must as part of the Project Plan submit a report proving that the bioregion, management system, soil type and crop types applicability conditions have been met, evidenced by farm management data covering the 5 years prior to project registration.</p> <p>All Project Areas included within an Aggregate Project will be individually subjected to standard monitoring requirements with no extrapolation between Project Areas permitted.</p> <p>Each individual Project Area will generate an individual Project Report and only the resulting credits will be aggregated to meet large-volume purchaser requirements.</p> <p><b>Reference made to the Koppen Climate Classification as advised.</b></p>	
5.1.d	Add: Carbon sequestered is carbon removed from the atmosphere and quantified through the approved methodology, not only reduced future emissions.	<p>Added:</p> <ol style="list-style-type: none"> <li>1. Credits are only issued for carbon removed from the atmosphere and quantified through this approved</li> </ol>	PASSED

		methodology after the initiation of baseline soil testing.	
Leakage	Project Proponents that expect leakage above de minimis shall account for that in the Project Plan.	Added:  Project Proponents that expect above de minimis leakage, shall account for this in the Project Plan.	PASSED
Permanence Period	no risk for reversal %?	<p>Our judgement is that the 20% Buffer Pool is the permanence period reversal protection as it will not be released back to the Project Proponent until the Permanence Report has concluded that no reversal has taken place after an MRV cycle at year 10.</p> <p><b>3. Permanence Period</b></p> <p>This credit class requires a 10-year permanence period assured by the Buffer Pool.</p> <p><b>Text added to the buffer pool requirements paragraph 5.4:</b></p> <p><b>A final permanence period monitoring report will quantify Project Area SOC stock 10 years after the final credit issuance vintage. This report will be subject to verification and buffer pool credits</b></p>	<p><i>PASSED with comments - I think this is good if it makes sense to you and you're stakeholders are ok waiting 20 years as opposed to ten to get their credits back. Also might be worth specifying what type of report you're requiring at the end of the permanence period</i></p>

		<p><b>only released back to the Project Proponent if the permanence monitoring report Project Area Net SOC total is equal to or greater than the Project Area Net-SOC total recorded on the final credit vintage monitoring report.</b></p> <p><b>Our judgment is that subjecting the project area to a full monitoring round at the end of the permanence period is sufficient protection against reversal.</b></p>	
Verification	In this section you should specify exactly what the requirements verifiers must follow to audit a monitoring report.	<p>Section Added, directly referencing the Regen Network Program Guide:</p> <p><b>6. VERIFICATION</b></p> <p>This section provides a general overview of the requirements for ex post verification of GHG and Co-Benefits assertions by an independent third-party verifier approved by Regen Registry.</p> <p>As defined in this section, verification will be conducted by an independent verifier chosen by the Project Proponent and approved by Regen Registry.</p> <p>Regen Registry seeks a balance between adequate assurances, the overhead, and costs associated with</p>	<i>PASSED</i>



		<p>verification. Therefore, each Credit Class can stipulate the requirements that are best suited to the ecosystem, best management practice and/or locale(s) it pertains to. Regen Registry retains the right to adapt the requirements and provide verification templates/interfaces as needed.</p> <p><b>1. Definitions</b></p> <ol style="list-style-type: none"> <li>1. Validation is the systematic, independent, and documented process for the evaluation of the reasonableness of the assumptions, limitations, and methods that support a statement about future (ex-ante) GHG and Co-Benefits outcomes.</li> <li>2. Verification is the systematic, independent, and documented assessment by a qualified ,impartial third-party of the GHG and Co-Benefits assertion for a specific reporting period.</li> <li>3. Regen Registry does not require an ex-ante GHG estimate in the Project Plan and therefore validation is not necessary. Instead, the verifier validates the project eligibility according to the rules defined in the Program</li> </ol>	
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		<p>Guide, Credit Class and the Approved Methodology. Regen Registry has simplified the eligibility requirements and considers verification an applicable standard. However, each Credit Class can customize the requirements as needed and add validation.</p> <p><b>2. Verifier Requirements</b></p> <p>The Project Proponent can choose a verifier from either of the following options:</p> <ol style="list-style-type: none"> <li>1. Verification bodies accredited under ISO 14065 and in good standing with their relevant ISO member body.</li> <li>2. Verifiers approved by Established Registries.</li> <li>3. Verifiers that satisfy these minimum requirements: <ol style="list-style-type: none"> <li>3.1. Have sufficient proof of identity.</li> <li>3.2. Obtain Errors &amp; Omissions Insurance for at least \$1 million.</li> <li>3.3. Has demonstrated technical expertise in agriculture and grazing.</li> </ol> </li> </ol>	
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		<p>3.4. Be in a position of fiduciary duty.</p> <p>4. Verifiers that are accredited under ISO 14065 (per article 10.2.1.1) and/or approved by Established Registries are automatically approved to be verifiers on Regen Registry. Other verifiers must submit an application for consideration. A list of approved verifiers will be made available on the Regen Registry website.</p> <p>5. In order to increase the assurance level in projects, Project Proponents shall engage at least two lead verifiers over the lifetime of their project, where the final project verification is done by a different verifier than the one used in prior verification events.</p> <p>6. Verifiers must sign a statement confirming their lack of conflict of interest with the Project Proponent. Regen Registry and the Project Proponent must be satisfied that any potential for conflict of interest can be mitigated. To limit the potential for conflict of interest, these restrictions are put in place:</p>	
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		<p>6.1. Verifiers will not conduct a verification for any project in which:</p> <p>6.1.1. Any member of the verification team has a financial interest in the project or the Project Proponent.</p> <p>6.1.2. The Verifier has played a role in developing the project.</p> <p>6.2. The verifier will disclose all relationships, such as familial or fiduciary, within the past three years between the Verifier on the one hand, and the project and Project Proponent on the other.</p> <p><b>3. Payment for Verification</b></p> <p>1. Project Proponent is responsible for engaging and paying for verifications.</p> <p><b>4. Evidence Gathering</b></p>	
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		<ol style="list-style-type: none"> <li>1. Verifier shall take necessary and appropriate steps to assure the project inputs are authentic, using a random sampling approach whenever appropriate. Verifiers will adhere to the Regen Registry data privacy policy to ensure Project Proponent maintains privacy of their data.</li> <li>2. Verifiers are required to provide assurance as to the reasonableness and accuracy of the data the Project Proponent has provided to Regen Registry and the Monitor, but they are not asked to attest to the validity or accuracy of the outputs of the Monitor.</li> <li>3. The Approved Methodology contains specific guidance on the scope of evidence gathering necessary to provide reasonable assurance with respect to the data the Project Proponent provides the Monitor.</li> <li>4. The verification includes but is not limited to the following categories: <ol style="list-style-type: none"> <li>4.1. Project Plan - the verifier shall verify the information provided in the Project Plan.</li> </ol> </li> </ol>	
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		<div>4.2. Project Ownership and Rights</div> <div>4.2.1. Verifier shall verify that the Project Proponent has legal rights to the land defined in the project boundaries. If the Project Proponent is an organization, the verifier shall also verify the documents provided to Regen Registry have been signed by the organization's representatives without a reasonable doubt.</div> <div>4.2.2. The verifier shall choose the appropriate level of Land Owner rights verification from the list below, where the default shall be the least strictest approach.</div> <div>Documentation</div>	
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		<p>verification levels, from strictest to least:</p> <p>4.2.2.1. Evidence of land title or deed of ownership – official document ation of Federal / State governme nt.</p> <p>4.2.2.2. <sup>2</sup>Rate payments, such as utility services provided by local jurisdiction s to the property and Project Proponent.</p> <p>4.2.2.3. Copies of email exchanges</p>	
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<sup>2</sup> [Program Rules and Requirements - Regen Library](#)

		<p>, letters, agreements or similar documentation (or their extracts).</p> <p>4.2.3. In the case the land is leased, the verifier shall also verify the lease agreement between Project Proponent (or the entity/individual represented) and Land Owner.</p> <p>4.2.4. If the Project Proponent is representing the Land Owner, the verifier shall verify the Deed of Representation between the Project Proponent and the Land Owner.</p> <p>4.3. Data inputs provided by Project Proponent to the Monitor – as stipulated by</p>	
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		<p>the Approved Methodology.</p> <p>4.4. The Monitor followed the procedures stipulated in the Approved Methodology.</p> <p>4.5. Compliance</p> <p>4.5.1. Compliance with Credit Class and Approved Methodology requirements:</p> <p>4.5.1.1. Project eligibility - see section above for full details. Including, but not limited to:</p> <p>4.5.1.2. Ownership type - matches the type mentioned in Project Plan.</p> <p>4.5.1.3. Project Activity falls within the</p>	
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		<p>defined accepted list of activities.</p> <p>4.5.1.4. Project Area matches land tenure description s.</p> <p>4.5.1.5. Adoption Date falls after the earliest accepted date and evidence is provided to attest to that.</p> <p>4.5.2. No double issuance - see Avoiding Double Counting section Regen Registry Program Guide V1.0, Para 6.5.3.</p> <p>4.5.3. Compliance with existing laws and regulations.</p>	
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		<div>4.6. Leakage - verifying estimated leakage by Project Proponent is a reasonable estimate (for example, uses regional default emission factors or is in line with similar projects).</div> <div>Table 1.0</div> <table><tr><th>Verification Type</th><th>Applicable Category</th></tr><tr><td>Project Registration</td><td>Project ownership and rights</td></tr><tr><td></td><td>Compliance</td></tr><tr><td></td><td>Monitoring Co-Benefits</td></tr><tr><td>Credit Issuance</td><td>Monitoring Co-Benefits</td></tr><tr><td></td><td>Compliance</td></tr><tr><td>Final Project Verification</td><td>Monitoring Co-benefits</td></tr></table>	Verification Type	Applicable Category	Project Registration	Project ownership and rights		Compliance		Monitoring Co-Benefits	Credit Issuance	Monitoring Co-Benefits		Compliance	Final Project Verification	Monitoring Co-benefits	
Verification Type	Applicable Category																
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		<table><tr><td></td><td>Compliance</td></tr></table>		Compliance	
	Compliance				
		<div><div>5. Verification Report</div><div><div>1. Verifiers shall generate a report summarizing their findings, including a verification rating from one of the following options:</div><div><div>1.1. Acceptance - if all the corresponding requirements in the Evidence Gathering section (10.4) have been satisfactorily met.</div><div><div>1.2. Acceptance with Contingencies -</div><div><div>1.2.1. If there were any deviations from the Approved Methodology.</div><div><div>1.2.2. If data provided by the Project Proponent (e.g. in the Project Plan) which is inconsequential to GHG estimation, could not be satisfactorily verified.</div></div></div></div></div><div>1.3. Rejection -</div></div></div>			

		<p>1.3.1. If project ownership could not be satisfactorily verified.</p> <p>1.3.2. If the Monitor did not follow key Methodology guidelines (excluding minor deviations).</p> <p>1.3.3. If data provided by the Project Proponent for GHG estimation is suspected to be fraudulent.</p> <p>1.3.4. Lack of compliance with Project Eligibility, Double Counting requirements, or existing laws/regulations.</p> <p>2. In terms of data to sample, verifiers shall follow the guidance provided in Table 1.0 per verification type.</p> <p><b>6. Verification Acceptance</b></p>	
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		<ol style="list-style-type: none"><li>1. Regen Registry will review each verification report and proceed based on its rating:<ol style="list-style-type: none"><li>1.1. Acceptance - Regen Registry will issue credits (if applicable) to the Project Proponents per the monitoring outcome and Program Guide / Credit Class stipulations.</li><li>1.2. Acceptance with Contingencies -<ol style="list-style-type: none"><li>1.2.1. the Project Proponent shall make the necessary corrections and clarifications per the contingencies identified in the report. If needed, the Verifier will resubmit their report after reviewing the information provided by the Project Proponent.</li><li>1.2.2. Regen Registry will issue credits (if applicable)</li></ol></li></ol></li></ol>	
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		<p>following the Acceptance procedure above.</p> <p>1.2.3. If the resubmitted verification report still retains the Acceptance with Contingencies, Regen Registry will highlight this in the corresponding MRV section.</p> <p>1.3. Rejection -</p> <p>1.3.1. The project is put on hold until the issues identified are addressed (see Project on Hold section).</p> <p>1.3.2. The carbon stock level will revert to the last level that was recorded and verified with the verification report with Acceptance or Acceptance with Contingencies rating. If the project has</p>	
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		<p>already been issued credits, then the Buffer Pool will be used to reconcile any gaps (see Buffer Pool section).</p> <p>2. Regen Registry will post all verification reports to Regen Registry.</p> <p><b>7. Verification Schedule</b></p> <p>1. The verification schedule will be optimized to limit the amount of verifications needed and maximize the assurance level in credit issuance:</p> <p>1.1. Project Registration - to be completed within six months after Project Registration Date.</p> <p>1.2. Credit Issuance</p> <p>1.2.1. Threshold verification - any issuance of GHG removal credit representing more than 25K tons of CO<sub>2</sub>e/yr shall require a</p>	
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		1.2.2.	verification report prior to issuance. Ongoing verification - these are intended to provide assurances over the maximum number of credits issued during the Crediting Term while at the same time limiting the overall audit expenses. To that end, Project Proponents shall select at which issuance event to perform this type of verification such that each one covers at least two monitoring periods. The verification shall be completed within three months of the last monitoring round chosen.	
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		<p>1.3. Final Project Verification - to be completed at the end of the project; must be a different verifier than the one used in prior verifications.</p> <p><b>8. Unscheduled Verification</b></p> <p>1. The following circumstances will warrant a potential additional verification:</p> <p>1.1. A previous verification report with a Rejection or Acceptance with Contingencies ranking.</p> <p>1.2. Significant variance (&gt;25%) from benchmark carbon sequestration rates for Project Activity.</p> <p>1.3. Compliance verifications - when Regen Registry has reasonable grounds to suspect the Project Proponent has contravened, is contravening, or is proposing to contravene with the rules and regulations.</p>	
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		<p><b>9. Verification Oversight</b></p> <p>1. Regen Registry reserves the right to conduct oversight activities of verification performance participating verifiers. Oversight activities are conducted to ensure an adequate level of quality control and are intended to supplement accreditation body oversight and audit processes</p> <p><b>Sub para added 6.7.1.4:</b></p> <p><b>1.1. Permanence period Verification - to be completed 10 years after the vintage year of the final credit issuance.</b></p>	
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