

Biochar Carbon Credit Class Review

Internal Final Review Round (3)

Sam Bennetts

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CONTENT referenced by reviewer's comment <i>e.g. Section number + paste exact text</i>	REVIEWER'S COMMENT <i>Please paste the comment from the reviewer</i>	AUTHOR'S RESPONSE <i>Please describe how the comment was addressed and include new content in quotations</i>	Reviewer's Conclusion [PASSED/ REJECTED WITH COMMENTS]
<i>e.g. 2.1 - "approximately 25%</i>	e.g. Replace with "adequate"	<i>e.g. This was changed to "The majority of the material must have a moisture content of 25% or less, as measured in the field."</i>	PASSED
Section 2 - Credit Class Overview	There is an unintentional paragraph break on page 6.	Removed break	PASSED
Section 3.4 - Adoption Date	We are changing our terminology in the Regen Registry Program Guide to use Project Start Date instead of Adoption Date. Please update this term	Changed to "Project Start Date"	PASSED

Section 3.4 - Crediting Term	<p>We are changing our terminology in the Regen Registry Program Guide to use Crediting Period instead of Crediting Term. Please update this definition.</p> <p>In terms of this section, I'm wondering what the reporting requirements are for such a short crediting term. Monitoring reports can take a long time to develop, especially if you are relying on a network of stakeholders to get the data/information. If a monitoring report can't be submitted until close to or just after a crediting period ends, what happens? Is there wiggle room?</p> <p>I would remove the "To renew a project, project developers must submit a new monitoring report" to the project renewal section, or just reference that.</p>	<p>Changed to "crediting period"</p> <p>The Crediting Period for this credit class is two years. Per the approved methodology, biochar must be applied to soils within one year of production. The monitoring report must be submitted by the Project Developers within one year of biochar application.</p> <p>Moved sentence to end of project renewal section.</p>	PASSED
Section 4.4 - Monitoring Plan	<p>What are the reporting requirements for the Monitoring Plan? I'm assuming this should be reported as part of the project registration process, which we actually have a section for in the</p>	<p>Removed section 4.4. Added to the project plan instead.</p>	PASSED

	Project Plan Template, so I would just mention that there.		
Section 4.5 - Monitoring Report	I think this section is good, though I would include an explicit reference to following the monitoring requirements outlined in the approved methodology.	Added: "All monitoring requirements from the approved methodology must be followed."	PASSED
Section 4.6. - Project Renewal	Does the Project Proponent need to resubmit a project plan or any subsequent information on renewal? I think they should submit some sort of renewal form which specifies whether there will be any changes made to the project or if they will be following the same plan submitted in the original Project Plan on renewal.	Confirmed with sam that 4.6 b covers this comment.	PASSED
Section 5.3 - Permanence Period	Given the permanence approach you are taking, I don't think this Credit Class needs a Permanence Period as you won't be doing any sort of monitoring at the end of the Permanence Period.	Removed this section.	PASSED
Section 5.5. - Buffer Pool	One question I have here is when buffer credits are released back to the project	We see buffer credits being held in perpetuity to cover potential losses during future projects.	PASSED

	<p>proponent. If the Crediting Period is only a year and credits are issued at the end of the year, what is the purpose of the Buffer Pool credits and how long are they held if there before being released back to the project? Looking at the examples of potential reversal events listed, it seems a few of these could happen after the crediting period. With that in mind, should buffer credits be held for a duration following the crediting period (like a year), and if so what are the conditions that allow their release back to the project proponent? Are buffer credits only required for projects which plan to renew?</p>		
Section 6.2 - Credit Distribution and Schedule	<p>See my comments on the buffer pool section. Also, you list credit issuance to the permanence pool which earlier you state won't be used with these projects. With that in mind you could probably remove this section.</p>	Removed section 6.2	PASSED