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EU Carbon Removal Certification Framework: Carbon Farming certification methodologies - Stakeholder survey

Fields marked with * are mandatory.

Introduction

This stakeholder survey is aimed at gathering feedback from stakeholders on the draft carbon farming methodologies related to the planting of trees, peatland rewetting and restoration, agriculture and agroforestry on mineral soils which are being developed within the scope of the CRCF Regulation. It follows up the recent meeting of the EU Carbon Removals Expert Group, where these documents have been presented and discussed, providing for an additional opportunity to submit feedback.

The results of the survey will inform the finalisation of these methodologies.

Guidance

The survey is divided in seven parts:

Part 1: Introductory questions
Part 2: Agriculture and agroforestry on mineral soils
Part 3: Planting of trees
Part 4: Questions relevant to planting of trees, agriculture and agroforestry on mineral soils
Part 5: Peatland rewetting and restoration
Part 6: Questions of horizontal nature
Part 7: Concluding question

Importantly, **please read the documents attached below for download to better understand the context of the questions.**

You are invited to respond to the best of your abilities or knowledge of the topic. If you are not knowledgeable about a specific topic, please skip the questions. Please use open fields only if there is information to be added that is strictly relevant to the related question.

In case of questions or comments, you can reach us at **screm@trinomics.eu**. Your voice matters and we are grateful to you for taking the time to complete this survey.

The draft methodologies are available for download here:

CRCF_peatland_rewetting_certification_methodology_draft_EG_May_2025.pdf
CRCF_planting_of_trees_certification_methodology_draft_EG_May_2025.pdf
CRCF_agriculture_certification_methodology_draft_EG_May_2025.pdf

Respondent identification

* Which stakeholder group do you belong to?

- ○ Certification scheme
- ○ Company
- ○ NGO
- ○ Public authority (EU)
- ○ Public authority (national)
- ○ Research/academia
- ◉ Trade/business association
- ○ Other (please specify)

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Agriculture & Agroforestry on mineral soils

Q1. What should the duration of the activity period be for the following carbon farming practices?

	5 years	10 years	15 years	Other

Agricultural practices that increase carbon removals in soils or reduce emissions of carbon from soils				
Agroforestry practices				
Agricultural and agroforestry practices that reduce direct and indirect N2O emissions from managed agricultural soils				

Q2. What should the duration of the monitoring period be for the following carbon farming practices?

	Same as activity period	5 years longer than activity period	10 years longer than activity period	Other
Agricultural practices that increase carbon removals in soils or reduce emissions of carbon from soils				
Agroforestry practices				
Agricultural and agroforestry practices that reduce direct and indirect N2O emissions from managed agricultural soils				

Q3. If an operator decides to reapply for the certification the activity after the end of an activity period, what should this mean for the activity-specific baseline?

- A. A new activity-specific baseline, based on the most recent reference period (of at least 3 years), should apply
- B. The same activity-specific baseline used in the previous activity period should apply
- C. Same as answer B, but a discount must be applied to the baseline
- D. Other

Q4. What should the spatial boundaries be for the quantification of GHG fluxes?

- A. Changes in both carbon stocks and N2O emissions should be quantified at the level of the whole farm holding (i.e. parcels that are under the operational control of the operator and that are under the same land use as the land where the carbon farming activity takes place)
- B. Changes in carbon stocks should only be quantified on the parcels where the carbon farming activity takes place, whereas the N2O emissions shall be quantified at the level of the whole farm holding
- C. Changes in both carbon stocks and N2O emissions should be quantified only the parcels where the carbon farming activity takes place

Open box for comments on the previous question.

800 character(s) maximum

Q5. When the measure-remeasure quantification approach is chosen for the quantification of soil carbon, what should be the baseline?

- A. The baseline can be zero, but the operators have the option to establish an activity-specific baseline based on control sites
- B. Operators should establish an activity-specific baseline based on control sites
- C. Other

Q6. The agricultural draft methodology Annex 1 proposes to determine buffer sizes depending on four classes of risks for carbon losses from soils, based on the recently published map by JRC. For SOC risk reversal a maximum buffer size of 10% is proposed. Do you agree with the proposed maximum buffer size value?

- Yes
- No

Planting of trees

Q7. In relation to wildfires and pest outbreaks, should clearcuts be allowed in excess of 0.3ha, in order to allow for the creation of corridors to limit the spread of the disturbance as well as to intervene in case of the event?

- Yes
- No

Q8. The draft methodology for the planting of trees proposes to determine buffer sizes depending on classes of risks and tree species, based on recent remote sensing products such as the European Disturbance Atlas. The scoring system to identify the buffer size is still in development. Do you agree with the approach of having different buffer sizes depending on risk and species?

- Yes
- No

If your answer was 'Yes', please specify which size values the buffer would need.

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The size value must be dependent on vegetation type and location.

Questions relevant to planting of trees, agriculture and agroforestry on mineral soils

Q9. For quantification approach 1: use of a Tier 2 model on the methodologies for agriculture and agroforestry on mineral soils and for planting of trees, one of the criterion is that models should be able to demonstrate that at least 90% of ground observations must fall within the model's [70%] prediction intervals. In your opinion is a 70% prediction interval acceptable?

- Yes
- No

Q10. When using models for quantifying carbon removals in soils and soil emission reductions, in the agricultural soils and the planting of trees methodologies, after 5 years a random selection of the sampling points used for initialisation of the model shall be resampled for verification of the model results. Which x% of the sampling points be resampled? Choose an option below.

- (●) 10%
- ( ) 20%

Open box for comments on the previous question.

800 character(s) maximum

Q11. When quantifying carbon removals in soils and soil emission reductions in mineral soils using conventional/representative sampling with one composite sample, the methodologies now propose that the composite consists of at least [15] sub-samples? Is this an acceptable number of sub-samples?

- (●) Yes
- ( ) No

Q12. For quantification of the uncertainty levels in the case of applying quantification approach 2: ground-based measurements, the methodologies now propose to use a 70% confidence interval for removals in mineral soils and a 90% confidence interval for carbon removals in biomass. Accepting a narrower confidence interval for soils reflects the higher inherent uncertainty in the quantification of removals in mineral soils, compared to biomass. Do you agree with the 2 different confidence intervals of 70% and 90%?

- ( ) Yes
- (●) No

If your answer was 'No', what do you suggest would be acceptable confidence intervals to apply for assessing uncertainty for carbon removals in mineral soils and biomass?

800 character(s) maximum

There should be the same uncertainty level for all. Using of different confidence intervals may lead to situations, where uncertainty appears smaller than in reality, and that should not be the purpose.

Peatland rewetting and restoration

Q13. What should be a conservative approach for considering uncertainties in the estimation of the emissions given the current peatland science and well-established national peatland schemes?

- (●) A. A default level of 10% to be deducted from the estimation of the emissions in the baseline and added to the estimation of the emissions in the activity
- ( ) B. Same as option A, but with a different default level
- ( ) C. A different approach

Q14. What should the minimum duration of the activity period be for the rewetting of peatlands?

- (●) A. 10 years
- ( ) B. Shorter than 10 years

- C. Longer than 10 years

Q15. If an operator decides to continue the activity after the end of an activity period, what should this mean for the activity-specific baseline?

- A. A new activity-specific baseline, based on the most recent reference period (of at least 3 years), should apply
- B. The same activity-specific baseline used in the previous activity period should apply
- C. Same as answer B, but a discount must be applied to the baseline
- D. Other

Q16. What approach should be taken in terms of pesticides and fertilisers when the rewetted land continues to be in agricultural use?

- The use of pesticides shall be minimised and alternative approaches or techniques shall be favoured, implying the development MRV for complying/auditing this requirement
- Agricultural activities shall take place without any use of pesticides and nitrogen and phosphate fertilisation (including manure), given the high degree of hydrological connectivity

Open box for comments on the previous question.

800 character(s) maximum

Q17. Inorganic soils may be included in the activity area, if as a result of the activity, they become wet soils and they do not represent more than [X%] of the scope of the activity. Please choose your preferred value for the term in square brackets.

- A. <05
- B. <10
- C. <20

Open box for comments on the previous question.

800 character(s) maximum

Q18. For the purpose of computing the net soil emission reduction benefit, the baseline shall be an activity-specific baseline which represents the continuation of the management carried out in the reference period, i. e. [at least] the three years prior to the start of the activity period. Please provide your preference for the length of the reference period

- At least 3 years
- Other

Questions of horizontal nature

Additionality

Q19. When should the incentive effect be tested?

- A. Always: all operators must pass a test showing that the incentive effect is there
- B. Derogation: early movers that started an activity between 2023-2027 do not need to carry out the incentive effect test
- C. Other

Q20. Currently, the draft methodologies include a requirement to carry out an investment analysis to test financial viability but, for the sake of simplification, they also include a presumption of compliance with this requirement if cumulation with public funding does not lead to overcompensation. Do you agree with this approach?

- A. Yes, it is sufficient to justify the application of the presumption of compliance in the activity plan
- B. Yes, but the application of the presumption should be limited in time, i.e. a final cut-off date should be included
- C. No, all operators must always carry out the investment analysis

Open box for comments on the previous question.

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Q21. In addition to the investment analysis test, the draft methodologies require operators to carry out a common practice analysis, but again, for the sake of simplification, include an overall presumption of compliance with this requirement for all carbon farming activities. Do you agree with this approach?

- A. Yes, as carbon farming activities are currently not common practice without support and therefore the analysis does not need to be carried out. It is sufficient to update this requirement in the context of the Commission review
- B. Yes, but the application of the presumption should be limited in time, i.e. a final cut-off date should be included
- C. No, all operators must carry out the common practice analysis

Open box for comments on the previous question.

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Liability

Q22. Should a materiality threshold be introduced in case of reversals (i.e. a threshold below which any carbon reversals can be neglected)?

- Yes
- No

Q23. Should the methodologies include provisions to allow units from the buffer to be gradually given back to operators before the end of the monitoring period?

- A. Yes, at every recertification audit
- B. Yes, but only at surveillance audits
- C. Yes, after the update of a risk assessment
- D. No

Q24. Should liability mechanisms be in place for soil emission reduction units?

- (●) Yes
- ( ) No

Q25. To take into consideration evolving natural and socio-economic circumstances, the methodology proposes that operators or group of operators shall update the risk assessment every [5] years and after any unavoidable reversal. Do you agree with the proposed frequency of 5 years?

- (●) Yes
- ( ) No

Q26. The methodology proposes that the stress-test shall occur at least every [2] years and in an event of a significant loss event. Do you agree with the proposed frequency of 2 years?

- (●) Yes
- ( ) No

Sustainability

Q27. The drafts include a possibility to prove mandatory co-benefits for biodiversity via peer-reviewed literature. Do you think this option needs further specifications?

- ( ) Yes, guidance is needed for its applicability
- (●) No, the draft as it stands ensures sufficient flexibility

Q28. Any reporting of voluntary co-benefits will be checked by the certification bodies. Should the methodologies include criteria to guide this check?

- ( ) Yes, further criteria would provide a more robust justification for a possible price premium
- (●) No, the control by the certification bodies is sufficient at this stage

Concluding question

Q29. If you wish to provide any additional feedback, please do so below.

1200 character(s) maximum

Contact

Contact Form