

Soil Enrichment Protocol Public Comments

Climate Smart Group and Carbon Credit Solutions Inc.

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Section	Page	Protocol element	Comment/question
3.5.1	21	This protocol also takes into consideration the extent to which a Project Owner has contributed towards the reversal through negligence, gross negligence, or willful intent	How is this assessed? Evidence requirements?
3.5.3	22	The risk of financial failure of the Project Owner, and therefore the Reserve's ability to act on the terms of the PIA, is factored into the project's Buffer Pool contribution, as described in Section 5.3.1	
3.5.3	23	The Project Owner receives written approval from the Reserve for an alternative mechanism for ensuring permanence on the project area	Can you confirm that these will be made public if approved, so others can follow the same methodology?
	23	The Project Owner elects to be issued credits based on tonne-year accounting (see Section 3.5.6), with credit issuance based on the tonne-year values associated with the length of the term of enforcement of the PIA.	Not sure how this would work in practice – e.g. if there's a 30-year crediting period, followed by a 100-year permanence period, if the enforcement of the PIA is say 30 years following credit issuance, then what credits are left to be issued via a tonne/year system?
	24	For example, if a certain high percentage of Field Managers maintain their SEP practices consistently throughout the crediting period and for at least 5 years following the conclusion of the crediting period, then permanence monitoring may conclude	A certain high percentage seems a little vague – I think we'd need some more detail on the methodology for determining this.
5.3	41	Risk of financial failure 10% penalty	The protocol states this is a 10% buffer pool requirement that applies to all private companies, however the presentation/webinar suggested a scale of 0 to 9%? Can you clarify how this determination is made?
8.4.1	85	Fields representing a minimum of one-half the square root of the total	Is it intentional that this guidance does not speak to you the number of different farms, just different fields? I

		number of fields in the project must be visited.	could imagine that the verifiers' risk-based sampling process would bring this element into consideration, but regardless, the variability of data quality etc. that is likely going to lead to errors in assertions might be more to do with record-keeping/data collection processes from farm to farm rather than field to field. As written, a verifier could in theory (though most unlikely – unless the highest risk category represented, in effect, one farm) satisfy this requirement by visiting one farm only, could they not?
8.4.1	86	Once fields have been selected for site visits, verifiers may seek Reserve approval to forgo an actual site visit, if sufficient proxy data exists such that a verifier considers it unnecessary for a member of the verification team to specific set foot at the relevant field	This is a welcome inclusion to open an avenue for lower verification costs – we would ask that successful requests and the CAR response be made public through the reporting and verification documents, so that standard for allowing this feature becomes a transparent and consistent practice/process