BELLONA EUROPA

Carbon removals and carbon farming – methodologies for certifying carbon farming

CONSULTATION RESPONSE

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Bellona welcomes the opportunity to submit feedback on the methodologies related to the certification of carbon farming methodologies within the CRCF as a draft Delegated Act. As discussed during the Expert Group meeting on the 5th of February 2026, a **joint statement** from Bellona, Carbon Market Watch, European Environmental Bureau (EEB) and Environmental Coalition of Standards (ECOS) was delivered over the two sessions of the day.

Bellona hopes this feedback will be taken into account for the next draft of the methodologies. Overall, beyond use-cases of the credits the crossover, stacking, potential claims of these activities between the methodologies and the Implementing Act of the CRCF should be explicitly addressed. Making sure that assigned credited certification bodies have no conflict of interest should be part of the reporting.

- **Scope & eligibility and activity periods**

The scope and eligibility criteria were *significantly changed*: activities on marginal and degraded land were scrapped altogether, with crop rotation and silvo-pastoral activities added.

We suggest adding an Indirect Land-Use-Change (ILUC) calculation, especially if the scope is extended to croplands, grasslands, and "other lands". An ILUC calculation is needed, per Article 4 of the CRCF regulation and is also accounted for in the Paris Agreement Crediting Mechanism (PACM). Basing it on a business case is rooted in scientific evidence and is not in line with the overall principle of conservative estimation and quantification. ILUC effects are triggered through dynamics on global agricultural commodity markets and even small shifts in land use can trigger displacement of food and feed production elsewhere, regardless of the local profitability or condition of the initial plot.

We contest that, instead of being limited to degraded land - a "no-regret" option that could have helped restore life to depleted ecosystems - the scope of the afforestation methodology has been expanded to other activities in this delegated act. Further, we consider the inclusion of "cropland" or "grassland" to pose significant risks, precisely due to the indirect land-use change (ILUC) not being calculated. At the very least, such activities should be excluded to avoid exacerbating land-use competition and unintended environmental impacts.

Livestock grazing is included, despite scientific consensus that livestock emissions often outweigh any carbon sequestration benefits. We recommend **including all livestock-related emissions and impacts, or exclude activities involving livestock from the methodology.** While rotational grazing is listed as an eligible practice, the draft methodology does not specify the baseline scenario. Relative to a scenario without livestock, any potential increase in Soil Organic Carbon (SOC) sequestration from the activity will not result in a net positive climate effect. However, methane and nitrous oxide emissions from livestock are not included in the monitoring and quantification tables. As such, the methodology fails to capture the likely negative net climate effect of rotational grazing.

Monocultures and tree planting lack strict guidelines: no clear ban on non-native species or weak justification for their use. Moreover, the guidelines of clearcuts were not to be found and should be addressed in the risk assessment tool.

The **link between biochar and carbon farming** is mentioned but it not clear what is expected in terms of double accounting and claiming of the credits between the two categories. For biochar, permanence is engineered into the material and the methodology discounts away the labile fraction of carbon, certifying only for the permanent fraction. However, for SOC projects, the soil is the storage medium itself and all microbial processed (including priming) directly change the credited carbon stock. This is why projects under temporary removals have reversals rules, a liability not attached to biochar units in the permanent removals delegated act. Because of the soil's dynamics and the addition of both labile and permanent carbon from biochar addition, a simple subtraction of biochar units is not sufficient for a carbon accounting perspective. Biochar credits should not be allowed if carbon farming activities take place from the same operator.

Incentivise the continuation of temporary practices. Per the CRCF Regulation, operators should be incentivised to prolong the monitoring period several times, with the aim of storing captured carbon for at least several decades. Taking afforestation as an example, current provisions do not prevent operators from clear-cutting trees after 40 years and burning them, which means we could essentially be subsidising forestry schemes aimed at logging thereafter. This lack of commitment to preserving carbon stocks would undermine any positive long-term climate impact generated during the activity.

Tighten implementation safeguards. Several provisions are vaguely worded and offer excessive flexibility for implementing the rules. For instance, quantification and uncertainty provisions seldom require ground data, there is unclarity around the updating of the baselines, and "existing databases", "expert judgment," and "scientific literature", are relied upon without sufficient clarity. Similarly, the language governing harvests, the use of non-native and single species is vague and fails to adequately safeguard against biodiversity risks. These shortcomings must be addressed to strengthen the robustness of the scheme, offer clarity for operators, and to ensure both uniform enforcement and quality across the EU.

- **Quantification**

Overall, **there is still a lot of flexibility when it comes to quantification**: rules are vague, with weak wording that could allow misuse. For example, phrases like *"certification schemes may provide additional guidance"* (instead of mandatory rules) or *"expert judgment"* (instead of hard data) should be removed. There is too much flexibility for baselines: farmers can use zero as a baseline for soil carbon, ignoring pre-existing vegetation. We suggest having activity-specific baselines with clearer rules on how to select datasets for justifying and updating the baselines. The methodology should provide specific guidance on how to allow models to be used. The baseline should account for ILUC and carbon debt / payback periods to make sure climate benefits are realised on the timescale of the certification period.

All methods have their limitations: remote sensing data is often based on physiological models and requires calibration with ground data. Models also do not account for real disturbances that occur. To this note, the calibration of remote sensing data should explicitly refer to the ground measurements required and not rely upon modelling for calibration. **In addition**, indicators such as size/age structure may take time before changes are detectable in young forestry biomass, and due to high soil respiration rates the net carbon balance may not be negative for the first few years.

Hence, instead an activity-based incentive may be more appropriate to finance nature restoration projects like reforestation on degraded/unused land than one based on quantifying the carbon.

Moreover, albedo effects are not part of the quantification of the methodology. However, there is strong **evidence** that albedo affects the overall carbon removal of afforestation from tree cover.

- **Liability and risk assessments**

The delegated act should respect article 5 of the CRCF Regulation and remove the derogations with regard to additionality and reinstate the common practice criterion. Derogating from such a foundational requirement for carbon crediting schemes effectively acknowledges that the practices certified under this scheme are not additional. While trying to lower the cost of MRV by pooling together operators and common practises, this could lead to misuse and poor data collection with high ecological impacts. And while we appreciate moving away from an ill-defined common practice criterion, this does not justify removing the criterion altogether. Common practice means wide adoption "within a region with similar pedoclimatic and regulatory conditions" - this must be added to the additionality assessment.

Bellona welcomes the use of the risk assessment tool from the JRC. The distinction between unavoidable and avoidable risks should be addressed in the methodology and their relative contribution to the buffer. There are risks that the suggested buffer pools may be insufficiently capitalised to deal with the risk of reversal from projects.

Peatland restoration projects are inherently unpredictable in terms of stabilisation times, fluctuation of emissions, net emission reductions, biodiversity benefits, seasonal and climate change. **Therefore, peatlands require a liability mechanism,** in line with Article 6(6) of the CRCF Regulation and with existing mechanisms under Verra, the PACM, and the UK Peatlands Code. Further, demand systematic project-specific risk assessments to accurately quantify all risks. These are essential to ensure the risk rate reflects each project's specific characteristics; failure to do so could seriously undercapitalise buffer pools. The rules lack clear penalties in the event that the stored carbon is released (e.g. due to avoidable and unavoidable reversals).

- **Sustainability**

Sustainability criteria are still lacking as it heavily relies on existing legislations, missed opportunity to define and go beyond what carbon and look at the CRCF from the biodiversity and ecosystem restoration services. The sustainability requirements should not rely on the upcoming Nature Credits Expert Group.

Minimum sustainability criteria must be strengthened: the explicit reference to Do No Significant Harm (DSNH) as an overarching minimum rule for the sustainability criteria should be reintroduced as well as the minimum requirements for a circular economy from the previous draft. Generally, we regret the lack of clarity around how the minimum sustainability requirements are to be operationalised and would have hoped for stronger safeguards. At present, operators must simply not break the law, yet the CRCF should be the space to push for more

ambition. Further, since these minimum requirements could be weakened in the future, provisions should be added to ensure this does not hinder the CRCF's sustainability criteria.

The "minimum sustainability requirements" are not being enough to prevent habitats of value to biodiversity being converted to afforestation. Valuable habitats such as extensive grasslands, that are not necessarily designated for protection, will be replaced by agroforestry activities; the counterfactual scenarios are not being defined (loss of biodiversity from the activity).

The mandatory co-benefits provisions should be more robust. At present, operators "may" choose one of the four options for compliance. It is unclear why the word "shall" isn't used. Does this mean operators can resort to other options? We are also particularly concerned that the current assessment is purely qualitative and does not require the use of indicators, such as those established under the Nature Restoration Law. Allowing compliance to be demonstrated through peer-reviewed literature alone is problematic, as relevant findings may be based on conditions that are not representative of the operator's project, exaggerating potential biodiversity gains. This option should be rendered more robust by, for instance, demanding specificity to the ecosystem of the activity area. Further, the methodology should require compliance with at least two of the listed options.

Finally, **social safeguards should be included.** Per Article 8 of the CRCF Regulation "the certification methodologies shall contribute to avoiding land speculation". And yet, this is nowhere to be seen. Addressing the social risks and requiring safeguards is crucial to avoid exacerbating inequalities in the land sector and to support rural areas across the EU.

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