

CMW and EEB Feedback on the July 2026 CRCF Carbon Farming Delegated Act

1) Indirect Land Use Change emissions not included

Add an ILUC calculation, especially since the scope of afforestation is extended to croplands, grasslands, and “other land”. Per Article 4 of the CRCF regulation, an ILUC calculation is needed. Basing the lack of an ILUC calculation on a supposed business case, which we don’t know anything about yet, is not supported by scientific evidence, and is not in line with the overall principle of conservative estimation and quantification. Emission factors, among other methods, are already being used to correct mitigation impact in other schemes. Despite their uncertainty, using these is better than assuming there is no ILUC.

2) Land speculation provisions not included

The Commission claims it lacks data to properly address this. It nonetheless constitutes a violation of Article 8 of the Regulation. Land speculation risks have been widely documented, for instance, by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, but also by news outlets. If this scheme is meant to help farmers, who often do not own but rent the land, it is unclear why the Commission is happy to proceed without these social safeguards. If anything, a lack of data should result in stronger safeguards.

3) Common practice criterion not included

Per the CRCF regulation, “a specific carbon farming activity should not be rewarded if it is already widely adopted within a region with similar pedoclimatic and regulatory conditions” (recital 14). The data gathered under the Common Agricultural Policy, such as the uptake of eco-schemes across different Member States, can help in establishing common practice, which is crucial for determining additionality. A lot of information on practices is available at the member state or even regional level through the CAP.

4) Safeguards for nitrification, denitrification, and urease inhibitors missing

We have flagged the scientific uncertainty and potential risks these products pose to water quality and soil biodiversity. It is important to include instructions and safeguards to demonstrate that their use has no negative environmental impact.

5) Monitoring periods are too short

Monitoring periods have been shortened over the iterations of drafting the methodology, despite these being a key mechanism for detecting reversals and ensuring the continuation of the practice. 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 (recital 22). However, since agricultural activity periods for carbon sequestration are only 5 years, and monitoring is only required for 5 years after that, the achieved carbon sequestration is only guaranteed for 10 years, contrary to the Regulation.

6) Provision on the crediting deficit period incomplete

Provisions need to address the deficit, should it still persist at the end of the last activity period.

7) High flexibility with quantification approaches

Operators can choose between different types of models, measurements, proxies, or default emission factors. Such flexibility enables participants to select the approach that produces the most favourable results, leading to inflated estimates of carbon benefits, and thus to an overissuance of units. Operators should be required to select the most accurate and conservative approach.

8) Carbon pools and emission sources imprecise

Given the long and open-ended list of eligible practices, each should have a dedicated table covering all emission sources, sinks or reservoirs that could be altered by the CRCF activity.

In addition, tables 1 and 2 do not align with table 3, for instance, on living biomass. The methodology should consistently refer to the relevant type of living biomass (above- or below-ground). When listing the associated emissions for each activity (pages 13-14), living biomass also doesn't feature (in contrast to table 3).

9) Key associated GHG emissions missing

Livestock: methane and nitrous oxide emissions from livestock are not included in the monitoring and quantification of GHGs. Relative to a scenario without livestock, any potential increase in SOC sequestration from an activity such as rotational grazing will not result in a net positive climate effect. As such, all livestock-related emissions and impacts should be included, or activities involving livestock should be excluded from the methodology.

Every project's planning and reporting should include a systematic assessment based on lifecycle emissions data, as required by Article 2.2 of the CRCF regulation. It should include, but not be limited to, the emission categories mentioned under associated emissions in the methodology.

10) Uncertainty rules lack ambition

The uncertainty deduction factor has been reduced to 8% without any evidence-based explanation. The methodology also does not account for key sources of uncertainty, including uncertainty related to assumptions on the business-as-usual scenario, the estimation of GHG associated, the use of proxies (approach 3), the use of emission factors (approach 4), and the use of allometric equations. Additionally, the methodology uses lower confidence levels for uncertainty (70% for SOC stock changes and N₂O emissions and 90% for biomass) than those prescribed under the PACM (95%).

The ICVCM requires that, in estimating overall uncertainty, “all causes of uncertainty shall be considered, including assumptions (e.g. baseline scenario), estimation equations or models, parameters (e.g. representativeness of default values); and measurements (e.g. the accuracy of measurement methods).

In PACM all sources of uncertainty are also considered, including in data (e.g. measurements), parameters (e.g. representativeness of default values), assumptions (e.g. in the baseline scenario) and methods (e.g. models to quantify emission reductions).

11) Baselines not conservative

For agricultural activities, the baseline can be set to zero where the measurement approach is chosen. For afforestation, a baseline equal to zero applies. While the text says that “the growth in carbon stock from such pre- existing vegetation shall not be included in the quantification of the temporary net carbon removal benefit”, this does not fix the baseline issue as, to avoid overestimation, it is important to account for trees or shrubs that could have grown in the absence of a project.

12) Requirements to update the baselines remain unclear

Should the activity be renewed, the revised activity plan must include updated information on the estimated baseline using updated assumptions and parameters. However, the reference period remains the same as before the start of the first activity period. In any case, this potential update would only apply for the renewal of the activity - for afforestation, no renewals are allowed, for the others, renewal is mandatory. Operators are also allowed to commit to longer activity periods from the start of the project, it is unclear whether baseline updates would take place if activity periods are set at a longer duration from the start and therefore renewals are less frequent.

13) Incorrect application of the downward adjustment provision under PACM

Under PACM, the role of the downward adjustment is to increase the ambition of the baseline over time, to better align it with net-zero goals. This is done through a minimum annual lowering of the baseline by 1%, regardless of the situation on the ground. It also applies to all activities.

The updated methodology acknowledges this role, yet has kept the title “update of the baseline” for this subsection, creating confusion. It is also restricted to projects reducing direct and indirect N2O emissions from managed agricultural soils, as opposed to all activities.

14) Rules for use of models weakened

When initialising models, the methodology allows initial SOC to be determined based on either validated regional or national SOC stock maps or on soil samples, whereas previously soil samples were required. Similarly, when verifying model results, the methodology allows operators to choose between resampling the initial sampling points and lab analysis approach, or using soil sampling data from regional or national monitoring networks. Models have inherent uncertainty given their reliance on generalised assumptions. Rather than using existing regional or national data - which are unlikely to be representative of the plot seeking certification - ground-truthing models with project-specific data can help reduce the gap with reality.

15) Crediting of non-additional activities

Derogating from such a foundational requirement for carbon crediting schemes effectively acknowledges that the practices certified under this scheme are not additional. The Commission has already stated that, to include early movers, it will review the CRCF Regulation and remove the additionality criterion, issuing certificates of performance, rather than credits. This is an acknowledgement that 1) many of the activities seeking certification under the CRCF risk being non-additional, and 2) such non-additional activities should not be credited. It is therefore unclear why the commission is still happy to proceed with the derogation.

16) Risks poorly assessed

First, risk assessments and rates should apply to peatlands and afforestation, where the current rules only refer operators to a Commission database.

Second, “high-risk” activities are not excluded. This is a robust safeguard introduced in other VCM standards e.g. Gold Standard.

Third, avoidable risks are also not part of the risk assessment, defying common practice in the VCM. To illustrate, the Verra AFOLU non-permanence risk tool includes internal risks, which covers project management and financial viability, among others.

Fourth, for agricultural activities, the risk rates are dependent on weak indicators, i.e. for “vulnerability”, carbon saturation is used as a proxy for SOC loss, risking oversimplification. The rates are also particularly low, risking there being too few credits in the buffer to compensate for reversals. In this sense, setting the risk rate as a floor is not a solution, as it ultimately depends on the operator's goodwill and does not ensure harmonisation across projects. Overall, offering a pre-determined, generalised percentage, exclusively based on unavoidable risks, is not a robust

way to calculate the size of the buffer. Risk calculations must be tailored to the particular conditions of the project seeking certification.

17) Liability rules insufficient

Allowing certification schemes to set rules on the potential insolvency of the operator also risks a lack of harmonisation. The consequences for when buffers can't be replenished (both by the operator and the scheme) should be clarified in the methodology. A good provision would be to allow for no further units to be issued until the buffer is replenished.

Similarly, there are no rules for when units that might have been claimed by buyers for offsetting expire. Cancelling expired units from the registry cannot safeguard environmental integrity since it entails no consequences on the offsetting claim that has been made. Provisions are needed to clarify that buyers bear the responsibility for replacing temporary units upon their expiry.

18) No liability mechanism for peatlands

Add a liability mechanism for peatlands, 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.

19) Unambitious and vague implementation of minimum sustainability requirements

The methodology lacks an assessment procedure and specific criteria per impact category. It is unclear how compliance with these broad requirements should be ensured and operationalised, and how monitoring should be implemented. It also remains unclear how any potential risks are addressed and what actions need to be taken should negative impacts be identified. Although the activity and monitoring plan shall include a proof of compliance with the sustainability requirements, it remains unclear what level of detail must be provided.

The methodology merely outsources sustainability requirements to existing EU law, effectively requiring operators not to break the law. In addition, most legislation are directives, requiring transposition into national law. This could lead to inconsistency for operators across the EU, where transposition has not been carried out, or has been carried out incorrectly. Lastly, other legislation can be weakened in the future, affecting the CRCF's sustainability criteria.

20) Pesticide use poorly regulated

We regret that the text lacks a clear reference to the general need to reduce and truly minimise pesticide use. This, despite the well documented detrimental impacts of pesticide use on soil biodiversity, a central element to carbon storage. Moreover, there is an overall recognised need to reduce pesticide use and toxicity to protect our environment, including water resources, to restore biodiversity, protect human health and answer scientific and societal calls.

We suggest strengthening the reference made to Directive 2009/128/EC, as follows: "The activity is pesticide-free by default, and only uses pesticides as a very last resort. The activity is aligned with the objectives and requirements of Directive 2009/128/EC of the European Parliament and of the Council, which aims to reduce the risk and impacts of pesticides. Integrated Pest Management, mandatory through Directive 2008/128/EC since 2014, emphasises prioritising preventative non-chemical measures, and always applying those practices with lowest risk to human health and the environment. The activity shall be aligned with measures of Directive 2008/128/EC to establish pesticide-free safeguard and buffer zones to protect water resources, and minimise pesticides to low-risk biocontrol, or ban pesticides, in protected areas established under Directive 2009/147/EC and Directive 92/43/EEC."

The current wording on "pollution" is too vague and allows for any interpretation when it comes to the metric to be used. The text should say at least that the use intensity, taking into account per hectare application rates, and total toxicity of applied pesticides shall not increase. It should also make reference to a scientifically robust pesticide indicator which takes into account toxicity and total load, such as the Pesticide Load Indicator used in Denmark, which is also described in literature and used by the JRC for assessments. It would be feasible to calculate this metric at the beginning and the end of an activity period.

21) Albedo not included

Albedo effect is currently not considered for afforestation, yet planting trees can lower the reflective properties of the Earth's surface. It can increase atmospheric radiative forcing, warming the planet and counteracting the climate effect linked to the carbon benefits of planting trees. The methodology needs to take this into account, particularly since it has expanded its scope to grassland, croplands, and other land. The Delegated Act mentions that this will be considered in future reviews, taking into account scientific progress, however fully leaving it out at this stage does not fit under conservative estimations of climate benefits.

22) Mandatory co-benefits lack integrity

The requirement to demonstrate a positive effect on biodiversity should apply to all actions, and not be limited to "at least one practice". Allowing one practice to tick the box for a group of actions is problematic given the open-ended practice list and the inclusion of potentially harmful activities, such as nitrification inhibitors, biochar, etc. Regarding demonstrating the co-benefit, requiring only one of the compliance options will default to operators simply relying on peer-reviewed literature, which is not project-specific and leaves room for interpretation. The methodology should require compliance with at least two of the listed options.