



June 28, 2024

Ms. Sasha Strohm  
Program Manager  
Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program  
U.S. Department of Agriculture  
RE: 2024-11424 7 [89 FR 46335](#)  
Submitted via email to [Sasha.Strohm@usda.gov](mailto:Sasha.Strohm@usda.gov)

Dear Ms. Strohm and the USDA Team:

The [Carbon Business Council](#) (CO2BC) is a nonprofit trade association of more than 100 innovative carbon management companies with over \$16.5 billion in combined assets working across six continents. We appreciate this opportunity to comment on the [Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program](#) (the “Program”).

The CO2BC and our membership are greatly appreciative of the continued efforts of the U.S. Department of Agriculture (USDA) to advance climate-smart agricultural and forestry practices, including those authorized and funded under the Growing Climate Solutions Act (GCSA). We would particularly like to highlight the opportunity to ensure that certain relevant high-integrity carbon dioxide removal (CDR) approaches, as outlined in our [May 2023 Farm Bill & Carbon Removal Policy Brief](#), are eligible for funding under the GCSA and other programs.

As such, and in response to [Question 4](#), we would like to suggest that the following public third-party protocols (listed alphabetically) for high-integrity CDR be included in the program:

- **Biochar Carbon Removal:** Climate Action Reserve’s [US and Canada Biochar Protocol](#); Puro.earth’s [Biochar Methodology](#).
- **Enhanced Weathering:** Isometric’s [Enhanced Weathering in Agriculture v1 Protocol](#); Puro.earth’s [Enhanced Rock Weathering Methodology](#). For additional information about the opportunity enhanced weathering affords to U.S. farmers and ranchers, please see the CO2BC’s May 2024 [Enhanced Weathering Policy Primer](#).
- **Reforestation / ARR:** Climate Action Reserve’s [Reforestation Forecast Methodology v2.0](#)
- **Microbial Carbon Mineralization:** Andes’ [Microbial Carbon Mineralization Version 1.0.1](#) (and successor versions).
- **Soil Carbon:** Nori’s [Croplands Methodology v1.6](#) (and successor versions); Verra’s [VM0042 v1.0 and v2.0 Methodologies for Improved Agricultural Land Management](#).
- **Terrestrial Storage of Biomass:** Isometric’s [Biomass Geological Storage](#) and [Bio-oil Geological Storage](#) Protocols; Puro.earth’s [Terrestrial Storage of Biomass Methodology](#).



We additionally recommend that USDA engage and coordinate with the U.S. Department of Energy (DOE), particularly the Office of Fossil Energy and Carbon Management (FECM), regarding criteria and standards for the monitoring, reporting, and verification (MRV) of high-integrity CDR. Like the USDA Program, FECM's [CDR Purchase Pilot Prize](#), [Voluntary CDR Purchase Challenge](#), and [Responsible Carbon Management Initiative](#) seek to create standards for what high-quality climate mitigation projects (including CDR) look like.

We applaud the Biden-Harris administration's "[whole-of-government](#)" approach to climate action, and the vital work across a number of government agencies to ensure high-integrity voluntary carbon markets. It is essential for all relevant parties (public, private, and non-governmental) to remain aligned in this regard in order to ensure the creation of a coherent set of standards, and to avoid a difficult-to-navigate patchwork of rules and regulatory frameworks.

Finally, we encourage USDA to structure the Program such that new protocols can be assessed on a regular basis over the coming years as they become operable. The CDR sector is extremely dynamic, and evolving rapidly. It is essential that the Program be designed to accommodate this continued innovation so that U.S. farmers, ranchers, and foresters can be incentivized to implement the most beneficial and effective climate solutions for years to come.

We would be pleased to discuss these points further with you if additional information or clarification would be helpful, and please let us know if there is anything the CO2BC can do to support this impactful program. We very much appreciate the important work that you do, and the opportunity to submit this input for your consideration.

Sincerely,

*Benjamin Rubin*

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