



C-AGG Comments on ACR Methodology for N₂O Emissions Reductions through Changes in Fertilizer Management 2.1 Update

Background:

The Coalition on Agricultural Greenhouse Gases (C-AGG) is a multi-stakeholder coalition of agricultural producers, scientists, environmental ngo's, methodology experts and developers, carbon investors, and project developers that promotes the development and adoption of science-based policies, programs, methodologies, protocols and tools for greenhouse gas (GHG) emissions reductions and carbon sequestration from the agricultural sector. C-AGG supports capacity-building and concrete approaches to incentivize voluntary GHG emissions reduction opportunities for agricultural producers that enhance productivity and income generation opportunities while benefiting society.

General Comments:

C-AGG has long supported the use of science-based, rigorous process models as a cost-effective means to measure GHG fluxes and emissions reductions from the agricultural and land use sectors, and has developed and shared white papers and summaries documenting approaches to dealing with structural and measurement uncertainty associated with these approaches. To continue driving down the costs associated with the quantification of GHG emissions fluxes for carbon offset projects, C-AGG is in full support and agreement with ACR's decision to make its *Methodology for N₂O Emissions Reductions through Changes in Fertilizer Management ("Fertilizer Management Methodology")* process model agnostic. Eliminating the requirement to rely solely on the use of the DeNitrification DeComposition (DNDC) model for GHG emission flux calculations by explicitly allowing for the use of either the DNDC model or comparable calibrated and validated process model in the quantification of GHG emission fluxes from changes in fertilizer management adds flexibility to the tools that project developers can utilize.

The DNDC model is a robust and fairly complex model that requires specific expertise to accurately run and utilize. Project developers without experience using DNDC may thus find its required use for offset protocols to be a challenge or barrier to project development. Adjusting the protocol to allow for the use of other calibrated and validated process models that may be more familiar to a project developer can thus reduce project costs, decrease project planning and implementation time, and minimize the need for additional staff training. All of these potential outcomes can help reduce project costs and implementation barriers. We are hopeful that the removal of this barrier to project development will lead to increased utilization by project developers of the Fertilizer Management Methodology.

While C-AGG is in full support of the updates ACR has proposed for the Fertilizer Management Methodology, C-AGG would also like ACR to consider additional changes to the ACR standard that have been noted by project developers as barriers to credit generation. Specifically, C-AGG encourages ACR to provide more specific guidance under the additionality section of the standard to resolve ambiguity regarding the requirement that projects prove the sole reason for overcoming a financial, technological, or institution implementation barrier was due to the incentives provided under a carbon market.



Project developers have found it difficult to confidently answer this question given the complex nature of the financial and technological landscape within the agricultural sector. C-AGG encourages ACR to add more specific guidance to the financial additionality requirement that speaks specifically to the unique issues faced by the agricultural sector, including the availability and use of conservation funding for activities included in agriculture methodologies.

Making the process model requirement of the Fertilizer Management Methodology agnostic is a welcome step towards reducing the costs and barriers faced by project developers generating carbon credits from agricultural based projects. C-AGG is encouraged to see this evolution in thinking and hopes ACR will continue to address methodological barriers to agricultural project implementation, so that the agriculture sector can continue to play an important role in supplying high quality, high impact carbon credits to buyers in the voluntary carbon market space.