



A Professional Society Representing the Nation's Crop Production, Research Consultants and Quality Assurance Professionals

CARBON MARKETS/SEQUESTRATION

CARBON MARKETS/SEQUESTRATION QUESTIONS/CONCERNS

A framework for quantifying baseline soil carbon and its accumulation has been drafted by the Climate Action Reserve (CAR): <https://www.climateactionreserve.org/how/protocols/soil-enrichment/>

NAICC's Concerns about the CAR Protocol are:

- Section 3.5 Requirements for Permanence
Practices and sequestered carbon must be maintained for 100 years after credit is issued. This poses a large problem for rented farmland and even generational ownership changes
- Section 6.6 Modelling Guidance
Most sequestered carbon will be estimated using models. This section states that multiple models may be used but doesn't ask for rigorous verification that the model produces correct data.

General Concerns:

- Carbon measurement is largely based on remote sensing and modeling with minimal requirements for actual soil testing.
- Setting minimum requirements to establish baseline carbon levels are needed.
- Who is regulating the trading of carbon credits? This should be decided first before moving forward.
- Who will monitor the program and how will it be enforced?
- Farmers are not adequately compensated to justify tying their land up for 10-100 years.
- How will growers who have been practicing conservation tillage and cover cropping for years be rewarded for accumulated carbon sequestration?
- How land owners are compensated along with the farmers who tend their land needs to be addressed.
- Growers/landowners sign a contract for 3 years to perpetuity (which becomes unclear when dealing with tenants and landlords and land changing hands)