

## Regen Registry Internal Review: *Soil Organic Carbon Estimation Methodology and GHG Benefits in Managed Crop and Grasslands Ecosystems Credit Class*

Submitted by: David Wright, Ecometric

Date: 12/6/2025

### **Summary of Internal Review Process**

The intent of the [Regen Registry Internal Review](#) is to ensure methodologies submitted to the Regen Registry meet the integrity expected by our community and ensure the document is sufficient to warrant review by Expert Peer Reviewers. The task of an Internal Reviewer is to provide critical feedback to help facilitate an understanding of how to improve the protocol/methodology to best serve Earth Stewards while maintaining scientific and community integrity.

The Regen Network Science Team has reviewed the *GHG Benefits in Managed Crop and Grasslands Ecosystems Credit Class v 1.5.2*. Our feedback has been provided in two ways:

- 1) Direct Comments: To provide targeted constructive feedback to specific sections of your protocol/methodology, our team commented directly in the document on what we found confusing, needed more definition, or was out of scope.
- 2) Overall Reflections: To provide more generalized feedback, our team provided the additional reflections in this document. Reflections are categorized by reviewers, a final combined summary of comments, feedback and suggestions is found in the Combined Summary section.

\*Note on Upgraded Credit Class:: This internal review assesses the upgraded *GHG Benefits in Managed Crop and Grasslands Ecosystems Credit Class v 1.5*. from the perspective of Regen Registry governance, scientific framing, and alignment with the Regen Registry Program Guide.

The review explicitly does not reassess the underlying quantification methodology, which has been reviewed separately by the Regen Registry Science Team. Instead, this review evaluates whether the Credit Class:

- Correctly scopes and constrains crediting logic
- Applies Program Guide requirements consistently
- Maintains scientific integrity at the credit-class level
- Preserves conservatism, auditability, and market clarity

## **Internal Review:**

### **Reviewer 1 - Rebecca Harman**

#### **General Comments:**

The upgrades introduced in Credit Class v1.5.2 represent a governance-consistent and scientifically appropriate refinement of the previously approved GHG Benefits in Managed Crop and Grassland Systems Credit Class.

The changes reviewed do not expand the scope of crediting, introduce new asset types, or alter Registry-level governance mechanisms established in the Program Guide or prior versions of the Credit Class. Instead, the updates clarify, strengthen, and more explicitly align the Credit Class with the upgraded SOC methodology and existing Regen Registry precedent.

The revised Credit Class effectively translates methodological updates into clearer eligibility safeguards, leakage treatment, permanence articulation, and verification procedures, without introducing new crediting risk or weakening existing controls.

Overall, the upgrade introduced in v1.5.2 is appropriate for Registry adoption and remains aligned with Regen Registry's Registry 2.0 principles.

#### **Comments by Sections:**

##### **Credit Class Scope & Scientific Framing**

###### **Upgrade Assessment:**

No expansion of scope or credit claims is introduced in v1.5.2. The updated Credit Class maintains SOC as the sole primary indicator and continues to restrict credit issuance to verified net atmospheric benefit (tCO<sub>2</sub>e).

###### **Registry Perspective:**

The updated language more clearly reinforces the separation between primary carbon outcomes and potential future co-benefits, ensuring that no additional benefit claims are implied by the upgraded methodology. This clarification strengthens scientific and market integrity without altering credit scope.

## Project Eligibility & Safeguards

### Upgrade Assessment:

v1.5.2 extends and clarifies eligibility safeguards, including a longer lookback period for ecosystem conversion and more explicit evidentiary requirements for land-use history.

### Registry Perspective:

These changes strengthen environmental safeguards relative to the prior version and reduce the risk of crediting projects associated with recent ecosystem conversion. The upgraded eligibility language is more explicit, verifiable, and aligned with Program Guide expectations. While more conservative than the prior version, the extended ecosystem conversion lookback period remains consistent with comparable land-use crediting programs and does not introduce a disproportionate eligibility burden relative to existing Regen Registry norms.

---

## Additionality

### Upgrade Assessment:

The updated Credit Class clarifies how additionality is demonstrated in relation to baseline establishment and verified SOC change, aligning terminology and logic more closely with the upgraded methodology.

### Registry Perspective:

These clarifications improve consistency between the Credit Class and the Approved Methodology without changing the underlying additionality standard. The update strengthens auditability and reduces interpretation risk for verifiers.

---

## Leakage

### Upgrade Assessment:

v1.5.2 refines leakage definitions and reporting requirements, including clearer thresholds, yield comparison logic, and expectations for documentation.

### Registry Perspective:

The updated leakage provisions are more explicit and conservative than the prior version,

---

improving transparency and enforceability. The changes align with Program Guide leakage principles and reduce ambiguity in verifier interpretation.

#### Permanence & Buffer Pool

##### Upgrade Assessment:

The permanence framework remains structurally unchanged, but v1.5.2 provides clearer articulation of buffer pool allocation, monitoring, and reversal reconciliation timing.

##### Registry Perspective:

These clarifications improve operational clarity without altering permanence obligations or buffer contribution levels. The permanence framework remains conservative and proportional to SOC reversal risk. These updates clarify the timing and mechanics of existing permanence and buffer obligations rather than introducing new permanence requirements or altering risk allocation.

---

#### Verification & Oversight

##### Upgrade Assessment:

Verification sections in v1.5.2 include improved structuring and clearer linkage between verification stages, evidence categories, and Registry decision pathways.

##### Registry Perspective:

The upgrades strengthen alignment with the Program Guide and improve usability for verifiers and Registry reviewers. No new verification burdens or governance risks are introduced.

---

#### Governance & Market Integrity

##### Upgrade Assessment:

No new asset classes, governance constructs, or expanded crediting claims are introduced in v1.5.2.

##### Registry Perspective:

All changes remain within existing Registry precedent. Where methodological updates result in more conservative net crediting outcomes, the Credit Class appropriately

---

preserves those constraints rather than compensating for them at the credit-class level. The upgrade is appropriately classified as a clarifying and alignment-focused revision, not a conceptual or governance-level change.

---

#### Clarity & Usability

##### Upgrade Assessment:

v1.5.2 improves internal consistency, cross-referencing, and alignment with the upgraded methodology documentation.

##### Registry Perspective:

These improvements enhance usability for Project Proponents, Verifiers, and Registry staff, and reduce the risk of misinterpretation during project onboarding and review.

#### **Final Decision:** - Pass

The GHG Benefits in Managed Crop and Grassland Systems Credit Class v1.5.2 is scientifically sound at the credit-class level, fully aligned with the Regen Registry Program Guide, and does not introduce governance or market integrity risks. The Credit Class appropriately operationalizes the approved SOC methodology into a conservative, auditable, and Registry-compliant crediting framework.