

USDA Greenhouse Gas Technical Assistance Provider and Third-Party Verifier Program

June 28, 2024

The Business Council for Sustainable Energy (BCSE) appreciates the opportunity to share its perspectives with the U.S. Department of Agriculture (USDA) in response to its request for information as it prepares a proposal to implement a Greenhouse Gas (GHG) Technical Assistance and Third-Party Verifier Program (the Program).

BCSE advocates for energy and environmental policies that promote markets for clean, efficient, and sustainable energy products and services. Since its founding in 1992, BCSE has focused on policy adoption that will increase the deployment of energy efficiency, natural gas, and renewable energy, as well as energy storage, sustainable transportation, and emerging decarbonization technologies. As a diverse coalition, not all BCSE members take a position, or endorse, the issues discussed in this submission.

A cornerstone of BCSE's policy advocacy has been the support of market-based instruments to catalyze deployment and expand private sector investment in emission reduction activities. In enacting the Growing Climate Solutions Act (GCSA), Congress recognized the opportunity for farmers, ranchers and private forest owners to both reduce harmful greenhouse gas emissions, while gaining important co-benefits for their households and communities.

BCSE appreciates the USDA's ongoing efforts to implement the GCSA and to explore opportunities to utilize voluntary carbon markets (VCM). Specifically, the Council welcomes the Department's support for high-integrity VCMs through the Joint Policy Statement and Principles announced in collaboration with the U.S. Department of the Treasury, Department of Energy, and White House climate officials. Please see BCSE's statement in response to the announcement [here](#).

For additional information on the questions included in the Request for Information (RFI), BCSE would like to acknowledge the submissions made by the [American Carbon Registry](#) and the [International Emissions Trading Association](#) (IETA). BCSE encourages thoughtful consideration of the issues and recommendations included in these submissions.

BCSE Views on Implementation Issues

BCSE appreciates USDA's interest in understanding stakeholder perspectives on the criteria used to evaluate protocols and the identification of specific protocols that should be considered for inclusion in the Program.

Critical to this work is to share protocols that are designed to ensure consistency, reliability, effectiveness, efficiency, and transparency of voluntary environmental credit markets and to provide technical assistance resources to Program participants.

As noted in USDA's report, "A General Assessment of the Role of Agriculture and Forestry in U.S. Carbon Markets," voluntary carbon markets offer a promising tool to achieve greenhouse gas



reductions from the agricultural and forestry sectors. However, farmers, ranchers, and private forest landowners face barriers to accessing voluntary carbon markets due to market confusion, high costs, and project requirements.

The RFI is an important opportunity to receive information from market participants and other stakeholders on protocol development and use and will help to facilitate participation in VCMs.

BCSE supports the recommendations included in the submission of IETA and the American Carbon Registry in response to the questions below.

Question 1: How should USDA define the terms “consistency,” “reliability,” “effectiveness,” “efficiency,” and “transparency” (see [7 U.S.C. 6712\(c\)\(1\)\(A\)](#)) for use in protocol evaluation?

The VCM is based on a system of processes to ensure that credits are transparent and verifiable. This is done with the establishment of independent crediting programs, like ACR, and accredited, third-party verification bodies. The crediting programs develop peer-reviewed protocols that include methodologies to quantify emission reductions and/or removals. Project participants measure, monitor and report emission reductions and/or removals following these protocols, which then require independent verification to ensure they have followed the processes correctly, in order to generate a carbon credit.

With regard to verification, it is vital that third-party verifiers have the credentials to provide the rigorous oversight needed to ensure high-integrity crediting. Currently, the independent crediting programs require that verifiers meet ISO 14065 requirements and are accredited by a member of the International Accreditation Forum. In addition to verification standards, there are several ongoing global initiatives being made to improve the robustness of the overall market.

In considering definitions for protocol evaluation, BCSE recommends that USDA rely on industry standard definitions which have evolved over the past two decades in collaboration with governments and stakeholders. This includes the world’s first global compliance carbon market, the International Civil Aviation Organization (ICAO) Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA), which developed the first international quality benchmark process for crediting programs and credits and has assessed almost 80 applications for approval to supply credits to the CORSIA. This is an evolving process as crediting programs are continuously updating protocols in response to the ICAO criteria, Paris Agreement Article 6 rules, the latest scientific literature, the complex needs of actors across the value chain, including farmers and ranchers, and emerging voluntary carbon market frameworks such as the [Integrity Council for the Voluntary Carbon Market \(ICVCM\)](#). USDA should seek consistency with these international frameworks and establish definitions and processes that allow for innovation and improvement over time.



Question 2: What metrics or standards should USDA use to evaluate a protocol's alignment with each of the five criteria to be defined in Question 1? What should USDA consider as minimum criteria for a protocol to qualify for listing under the Program?

USDA should refer to established peer-reviewed frameworks, including, but not limited to the following:

- [Carbon Offsetting and Reduction Scheme for International Aviation](#) (CORSIA)
- Integrity Council for the Voluntary Carbon Market (ICVCM)
 - ICVCM [assessments](#) include assessment of programs adherence with the [Core Carbon Principles Framework](#).
- [International Carbon Reduction and Offset Alliance](#) (ICROA)

As noted above, the carbon market is evolving based on new innovations and the latest scientific and technical information. USDA should establish processes that allow for such evolutions, that will maintain the credibility and effectiveness of the VCM.

Please do not hesitate to contact BCSE President [Lisa Jacobson](#) with any questions.

Thank you for your consideration.