

Section 3.3 – Project Crediting Period

Change of wording around when a renewal may be requested (only after final campaign) adds additional uncertainty for organizations and their partners on continuation of projects with the Reserve. Suggest reverting language back or allowing a renewal to be requested within the last 6 months or following completion of final campaign to allow more flexibility and provide better clarity to organizations.

Section 3.5 – Regulatory Compliance

Added statement of “Project developers are required to disclose in writing to the verifier any and all instances of non-compliance of the project with any law” is overly broad. All U.S. states have requirements to submit annual or semi-annual compliance reports. Suggest that having a verifier review your reports should be sufficient to address this requirement. If a non-compliance does occur, then it should be reported to the Reserve no more frequently or sooner than reported to regulatory authorities.

Section 3.6 – Social safeguards #2 Dispute Resolution

Suggest removal of Social and Environmental Safeguards. Regulatory Compliance is already required and that has a well defined public comment period associated with it. Inclusion of Social and Environmental Safeguards in this protocol on top of those processes may open CAR to liability for either holding up (or not) a project based on comments received during this process based on CAR’s interpretation of materiality.

Section 3.6 - Environmental Safeguards #2 - Mitigation of Pollutants

Suggest removal – this section implies project must mitigate other forms of pollution as part of project. Reword to only mention releases specific to the particular project scope.