ISOMETRIC

Biochar Storage in Soil Environments v1.2

Public Consultation Summary

Published on 14 November 2025

Context

Isometric held a public consultation on its Biochar Storage in Soil Environments v1.2 to receive stakeholder input on this Module.

The public consultation was announced on the 10th October, 2025. The period of consultation lasted 30 days, with the final day as the 10th November 2025.

After the public consultation, the feedback received was considered for incorporation into the Module. This document summarizes the feedback received during the public consultation by theme and the revisions included as a result of the comments.

We thank all participants for their time and input.

Summary of feedback received

Section	Comment	Resolution
Application Rates	Suggested maximum application rate should be fixed by scientific evidence, as most jurisdictions lack regulations for biochar as soil amendment.	[No Change]: Application responsibility remains with Project Proponent or offtaker to understand local regulations and ensure appropriate rates for soil type and conditions. Added requirement that Project Proponents must provide best practice guidance for handling and application to minimize environmental and health risks.
Third-Party Sales Buffer	Suggested increasing buffer pool fraction when biochar is sold to third parties due to significantly higher fraud risk, noting examples with other standards.	[No Change]: Evidence requirements for all three storage pathways and crediting only at point of mixing minimizes reversal risk adequately.
Processing Facility Timeline	Noted that sentence about mixing biochar within stated number of days of receipt was unclear.	[Changed]: Revised sentence for clarity.
Record Retention Period	Suggested changing record retention from recommendation to requirement (minimum 5 years).	[Changed]: Amended sentence to make this a mandatory requirement.

Best Practice Guidance	Suggested that best practice guidance should involve a maximum dose per hectare and requirement to incorporate biochar into soil.	[No Change]: Application responsibility remains with Project Proponent or offtaker to understand local regulations and ensure appropriate rates. Added requirement for best practice guidance to minimize environmental and health risks.
Stockpiling Duration	Argued 12 months maximum stockpiling is too long, suggesting 3 months. Asked if credits are generated before final application.	[No Change]: Credits will not be generated before final application or mixing. The 12-month period is purely for storage of raw biochar between production and storage.
Mineralization Model	Suggested using Azzi et al. results and model instead of Woolf et al. to avoid over-crediting.	[No Change]: Woolf et al. model is well-accepted as conservative measure of biochar mineralization and appears to be accepted by CRCF. The power model is untested in VCM and is not as conservative, leading to large risk of over-crediting.
VVB Section Placement	Noted Validation and Verification Body section appears misplaced.	[Changed]: Amended text placement.
PAH Risk Mitigation Option	Requested removal of individual risk mitigation option.	[Partially Changed]: Option retained for flexibility but tightly controlled. Must be pre-approved by Isometric and documented in PDD. Clarified this option is only available for high-tech, continuous production processes.
Dry Basis Determination	Asked how dry basis is determined, noting many different methods exist with varying accuracy.	[Changed]: Clarified that all results for carbon removal must be reported on dry basis to ensure standardized, stable reference point. Added explanation that this makes data repeatable and reliable regardless of water content at testing time.

Production Batch Definition	Asked how production batch is defined, noting this is crucial for representative and consistent results.	[Changed]: Added direct link to Section 8.3.2 of the Protocol where production batch is defined to avoid confusion.
Crop Yield Reporting	Suggested changing crop yield reporting from optional to required on annual basis.	[No Change]: Remains optional due to diverse agricultural systems with varying monitoring capacities. Mandating could impose undue burden and some farmers prefer not to report sensitive data. Project Proponents still must monitor environmental impacts and address any adverse effects on productivity or soil health.