ACR Standard v7.0
Summary of Public Comments and Responses

An updated ACR Standard, Version 7.0 was revised by for approval by the American Carbon Registry (ACR). The ACR Standard and a summary of changes document were posted for public comment from October 2, 2020 through December 1, 2020. ACR held a number of meetings with interested stakeholders to discuss proposed updates.

ACR would like to thank all the organizations that submitted comments to the draft ACR Standard version 7.0. The comments were extremely thoughtful and informative and have directly guided our thinking on the issues and concerns that were raised. Please find a summary of key comments and the ACR response below. All comments that were received are also posted in their entirety on the ACR website, here.

Section 10.B: Policies to Prevent Double Claiming of Emissions Reductions		
Commenter	**Comment**	**ACR Response**
Blue Source ICROA GreenTrees Natural Capital Partners Project Developer Forum The Climate Trust	Numerous comments were received in response to section 10.B regarding policies to prevent double claiming of emission reductions in voluntary carbon markets, specifically requirements for host country letters of authorization and agreement to make corresponding adjustments for offset credits transferred for use outside of the host country for voluntary (scope 1 & 2) offsetting purposes. Stakeholders expressed concerns including that: • This proposed policy is premature because UNFCCC decisions related to Paris Agreement accounting under Article 6 are not finalized and are still subject to change; • Implementation of the proposed policy in 2021 could disrupt project development already in progress, commercial credit sale agreements in place and currently being negotiated;	In light of the numerous comments received citing many valid concerns related to immediate enactment of the proposed policy, and in conformance with recommendations by the EDF- High Tide Foundation steering committee on “Mobilizing Voluntary Carbon Markets to Drive Climate Action,” ACR has decided to postpone consideration of this policy until a future date. ACR may reconsider the proposed policy in the future depending on the associated timing of decisions, processes and requirements under the UNFCCC,

The Nature Conservancy Tradewater	• The proposed policy could result in unintended price differentiation in the market; • A transition period is needed prior to implementing the proposed policy; • The proposed policy could lead to equity issues related to relative capacity to issue needed authorization letters and adjustments; • It is unclear if the proposed policy will be required by governments (and if so, which ones) for voluntary offsetting; and • The processes and infrastructure needed to obtain authorization letters and make accounting adjustments are not yet established within governments.	and how they are clarified, and the ability of market and host country participants to establish workable processes and systems for applicable requirements.
Section 6.F.2: Programmatic Development Approach		
Commenter	**Comment**	**ACR Response**
GreenTrees	The draft limits enrolling new sites to no longer than 5 years after the project start date. We see no reason for such a limit. This bullet point should be deleted. Keeping this bullet point as written would effectively prohibit afforestation programmatic projects.	This change was made to temporally align site implementation date (planting date for A/R) with project start date. A/R projects may enroll sites for up to 5 years from project start date. Sites with implementation dates beyond 5 years may be consolidated into a new PDA project.

Appendix B: ACR Requirements for avoiding double counting in the ICAO's CORSIA		
Tradewater	The ACR Standard does not distinguish between emissions reductions that are covered by (or inside) a host country's NDC targets and those that fall outside of a host country's NDC targets. The failure to make this distinction – and to provide clear rules for how a project developer can establish what is covered by (or inside of) a host country's NDC and what is not, and tag credits accordingly – imposes unnecessary and unfair burdens on project developers. It also creates perverse incentives for host countries to "meet" their NDC targets by claiming as their own privately developed emissions reductions that were neither part of the host country's plan nor included in the baseline.	ACR recognizes that in some cases, there may be grey areas for whether activities are inside or outside of a host country NDC. In Appendix B, Section B.4 ACR Requirements, under Figure 1: Steps for Units to be Qualified by ACR for Use in CORSIA, step 1 in the graphic is to determine if the emission reductions are covered by the host country NDC. The explanation to step 1 details that "*If the nature, scope or applicable period of an NDC target is not clear, the Project Proponent and ACR may further evaluate information communicated by the Host Country to the UNFCCC and/or seek clarification from the Host Country government UNFCCC Focal Point*."