The BioCarbon Methodology BCR0011 for Sustainable Biochar Production, Carbon Removal and Long-Term Storage was developed in response to the growing importance of biochar as a climate mitigation strategy, combining carbon sequestration with sustainable resource management.

In light of increasing global demand for scalable carbon dioxide removal (CDR) solutions and the need to safeguard soil health, ecosystem services, and long-term permanence, BioCarbon has designed a methodological framework that establishes robust requirements for the production, application, and monitoring of biochar. The methodology enables the quantification of GHG emission reductions and removals from biochar projects, ensuring alignment with international best practices, IPCC guidance, and the integrity safeguards of the BioCarbon Standard.

The BCR0011 methodology was released for public consultation on August 1, 2025, with the objective of supporting transparency, stakeholder participation, and technical refinement. The consultation process was open to a broad range of stakeholders, including technical experts, project developers, institutions, validation and verification bodies, and environmental organizations.

This document presents a synthesis of the feedback received during the consultation period, as well as the main adjustments and improvements made to the methodology in response to the comments. The contributions received were instrumental in enhancing the clarity, applicability, and methodological integrity of BCR0011, ensuring its suitability for diverse agricultural, industrial, and non-soil applications of biochar.

We extend our sincere thanks to all professionals and institutions who participated in the consultation process. Their constructive feedback and rigorous evaluations have meaningfully contributed to the continuous improvement of the methodology.

As a result of this participatory review, Version 1.0 of the BCR0011 methodology is now presented. Annex A below includes a summary of the comments, observations, and suggestions received, along with the corresponding clarifications or adjustments made as part of this process.

ANNEX A. BCR Standard Public Consultation

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№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
1	11.6.1 – page 32	Although Section 11.6.1 outlines important considerations regarding soil fertility, microbial activity, and agronomic performance, these are presented as general recommendations rather than binding requirements. There is no reference to minimum monitoring parameters, methods, frequency, or integration into the project's MRV system. Given the potential for adverse soil impacts over time in the case of improper application, would it not be advisable to elevate these	We appreciate this valuable observation. Section 11.6.1 currently provides general guidance on soil fertility, microbial activity, and agronomic performance, but we agree that these aspects require stronger safeguards where agricultural applications are concerned. To address this, we will introduce new requirements under Section 12 (Permanence) and Section 18 (Monitoring requirements) to ensure that soil health parameters such as SOC, pH, nutrients, and microbial activity are formally monitored, integrated into the MRV system, and linked to permanence assessments. This will strengthen environmental safeguards and ensure that any

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		aspects to formal monitoring requirements under Section 12 or 13, particularly for agricultural applications? This would enhance environmental safeguards, support SDG reporting, and provide evidence to substantiate any declared co-benefits related to soil health.	adverse impacts from biochar application are detected and corrected. At the same time, we wish to clarify that in the BioCarbon Standard, SDGs are not treated as optional co-benefits. They are mandatory and are assessed through the dedicated SDG Tool. Additionally, the SDS Tool (Sustainable Development Safeguards Tool) already includes requirements to assess potential environmental and social impacts—including those on soil quality—and to identify mitigation measures where applicable. Therefore, the combination of the strengthened monitoring provisions in the methodology, together with the existing requirements of the SDG Tool and the SDS Tool, ensures that soil health is comprehensively safeguarded within the BioCarbon framework, without duplicating reporting obligations.

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Nº	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
1	Section 13.2 (e)	We recommend that the implementation of early warning and monitoring systems consider state-of-the- art standards such as those applied by Satellites on Fire, which combine multiple satellite sources (GEO and LEO) with proprietary super-resolution and AI algorithms to optimize early wildfire detection. The 10-minute refresh rate and near real-time data processing capabilities have proven to reduce response time and increase mitigation effectiveness.	The BCR0011 methodology is focused on the quantification of GHG emission reductions and removals from biochar production and use, rather than on wildfire detection per se. Nonetheless, we recognize that advanced satellite monitoring systems can provide valuable complementary information for risk management and permanence safeguards, particularly in relation to fire events that may affect project areas. We will therefore consider including a general reference to the potential use of multi-source satellite monitoring systems as a complementary tool for permanence and reversal risk assessments, while ensuring that the methodology remains

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
			technologically neutral and globally applicable.
2	Section 15.4 (e)	We suggest that methodological practices include the use of platforms with scalable infrastructure and direct access to satellite data sources (AWS Open Data, EUMETSAT, NASA, etc.), minimizing latency and ensuring faster alerts than current standards. The methodology should prioritize interoperability with on- the-ground optical and thermal sensors to enhance accuracy and reduce false positives.	Within the BCR0011 methodology, monitoring requirements are designed to ensure transparency, verifiability, and traceability of data on biochar production, transport, and application. While wildfire detection systems fall outside the primary scope of this methodology, we will consider incorporating general language under monitoring requirements (Section 18) to recognize that remote sensing and complementary sensor technologies may be used as supportive tools for environmental and permanence risk monitoring. To ensure impartiality and global applicability, any such reference will remain technology-neutral and non-prescriptive.
3	General	To ensure impartiality and technical robustness, the methodology should	We agree that cross-validation with historical data and traceability of

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
		incorporate cross-validation with historical heat spot data and actual wildfire events, as implemented in our system. These validations allow calibration and optimization of detection capabilities, offering a replicable and auditable model across different geographic contexts.	monitoring outputs can strengthen the technical robustness of monitoring approaches. The BCR0011 methodology already includes requirements on transparency, documentation, and QA/QC (Section 19). Within this framework, we will consider including general language encouraging the use of verifiable and traceable data sources (which may include satellite records and historical datasets) where relevant to permanence and risk verification. Any such provisions will be formulated in generic terms to maintain neutrality and global applicability, without prescribing specific technologies or proprietary systems.
4	General	We recommend including clear guidelines for alert logging and traceability, incorporating metadata such as satellite source, resolution, exact acquisition time, and assigned probability level. This ensures	Transparency and traceability are already central principles in the BCR0011 methodology, particularly under the QA/QC provisions in Section 19. However, we will review the possibility of adding explicit guidance on metadata and data traceability (including source, resolution,

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
		transparency and accountability within certification processes.	and acquisition details) as supportive elements for monitoring and permanence risk management. Such provisions will be formulated in general terms, ensuring consistency with existing BioCarbon Standard requirements, and avoiding reference to specific technologies or proprietary platforms, in order to maintain impartiality and global applicability.