

The BCR STANDARD is a high-integrity framework developed by BioCarbon Cert® to guide the certification and registration of GHG mitigation activities. Grounded in internationally recognized best practices, it establishes rigorous environmental, social, and methodological requirements to ensure that all emission reductions or removals are real, additional, measurable, and verifiable. The Standard integrates robust criteria for baseline definition, additionality, permanence, safeguards, and stakeholder engagement, aligning with recognized principles of integrity in the voluntary carbon market. Version 4.0 reflects continuous improvement and technical rigor, reinforcing its role as a trusted benchmark in the international voluntary carbon market.

The draft version of the BCR Standard was released for public consultation on June 9, 2025, with the objective of promoting transparency, enabling stakeholder engagement, and reinforcing the technical and environmental integrity of the BioCarbon Standard. The consultation was open to a wide range of stakeholders, including technical experts, project holders, public entities, Indigenous Peoples and Local Communities, Conformity Assessment Bodies (CABs), and environmental organizations.

In addition to submitting the document for public consultation, the BioCarbon Technical Committee (TC) conducted a thorough evaluation of the consulted version. As a result of this in-depth review, the Committee required several adjustments to the document to ensure alignment with the Core Carbon Principles (CCPs) of the ICVCM and to uphold the highest standards of environmental and methodological integrity.

This document presents a summary of the feedback received during the public consultation period, along with the main adjustments made to the BCR Standard in response to stakeholder comments. The input received contributed to improving the clarity, applicability, and technical rigor of the standard, supporting its alignment with international best practices and its relevance across diverse geographical and institutional contexts.

We sincerely thank all those who took the time to review the BCR STANDARD and demonstrated a strong interest in our programs. Their insightful feedback and careful assessments played a key role in shaping this version of the Standard and continue to support its ongoing improvement.

As a result of the public consultation process and the TC review, Version 4.0 of the document is now presented. Annex A (below) includes 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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Date 08/07/2025

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
1	Climate change adaptation (Section 11.8, page 22)	<p>We understand the importance of assessing climate change adaptation measures, risks, stakeholder engagement, among others. However, some of the listed actions may not be applicable to certain types of projects, such as small-scale energy generation or other sector initiatives where there is no impact on ecosystems or communities.</p> <p>We suggest including a clarifying note that allows for satisfactory justification to BCR</p>	The text in Section 11.8 has been adjusted to clarify that adaptation requirements are to be applied according to project type, and that project holders may justify the non-applicability of certain actions with appropriate technical documentation.

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
		regarding the non-applicability of certain requirements in this section.	
2	Sustainable development safeguards (Section 15, page 35)  Stakeholder engagement and consultation (Section 16, page 36)	<p>The new version of the BCR standard incorporates additional criteria related to stakeholder engagement, including human rights, gender equality, and detailed reporting of such engagement. Since the standard allows for retroactive application of up to five years from the project's start of operation, it is possible that some of these criteria were not addressed during the public consultations carried out in the design or construction phases.</p> <p>We suggest including guidance related to the application of these additional criteria to retroactive projects that may not have considered it.</p>	The standard now includes a specific provision stating that retroactive projects shall demonstrate compliance with stakeholder engagement and safeguard requirements in effect at the time of validation. Where initial consultations did not cover specific criteria, project holders are required to identify gaps and implement corrective measures, such as follow-up consultations or updated documentation, prior to validation.

BCR STANDARD

Process: Public Consultation

Version: 09/06/2025



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Date 09/07/2025

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
1	N/A	Beta Analytic submitted a technical recommendation advocating for the mandatory use of Carbon-14 testing (ASTM D6866 Method B) to determine the biogenic carbon content of fuels, feedstocks, and emissions. Their proposal highlights the method's adoption by leading regulatory programs (e.g., US RFS, EU RED, UNFCCC) and argues that direct radiocarbon analysis is the only reliable approach to prevent overestimation and greenwashing risks associated with mass balance or calculation-based methods. They recommend requiring ISO/IEC 17025:2017-accredited, tracer-free	The use of Carbon-14 testing (ASTM D6866 Method B) to determine biogenic carbon content is a highly relevant and well-supported proposal. We find the approach particularly valuable for enhancing accuracy and traceability in methodologies involving waste, biofuels, and biomass-based emissions. Your suggestion will be forwarded to the Technical Committee for further review and consideration of its inclusion in applicable BioCarbon methodologies.

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
		laboratories and limiting the role of calculation-based approaches to complementary use only	

BCR STANDARD

Process: Public Consultation

Version: 09/06/2025



Name Carlos Eduardo Abondano Leal

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Date 10/07/2025

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
1	14. Risk assessment and management. Pg. 30.	<p>Error tipográfico en el párrafo 5, donde al parecer se dice listados, en inglés “listed” y en su lugar se escribió “listen” que traduce escuchar.</p> <p>“This requisite shall complement BIOCARBONS  Sustainability Development Safeguards (SDSs) tool. It will come into play for the GHG project holder to identify additional risks related to the project activities beyond those listen in the mentioned tool.”</p>	El texto ha sido ajustado

Nº	Reference (Section and page in the document)	Comment, Observation, or Suggestion	Clarification / Adjustment
2	29. Transition plan. Pg. 65	Cordialmente se solicita que los proyectos puedan continuar y culminar el proceso de validación y/o verificación con la versión de los documentos metodológicos vigentes al momento de realizar la visita de campo por parte de la OVV (CAB por su sigla en inglés) o que el periodo de transición sea de 90 días calendario; esto considerando que los requisitos y cambios metodológicos del programa y su estándar deben ser verificados en terreno (área geográfica del proyecto) por la auditoria, y que la incertidumbre por cambios metodológicos durante el proceso de validación y/o verificación afectan el cumplimiento de los cronogramas y la integridad técnica de los desarrollos planteados en los documentos de Diseño del Proyecto (PDD) y Reportes de Monitoreo (MR) generando nuevas rondas de hallazgos y actualizaciones	<p>Se incorpora una disposición en el documento del estándar que permite a los proyectos continuar o culminar su proceso de validación y/o verificación con la versión metodológica vigente al momento de la visita de campo por parte del organismo de evaluación de la conformidad (OEC), siempre que dicha auditoría haya sido notificada al Programa con al menos diez (10) días calendario de antelación a la fecha programada para la visita.</p> <p>Adicionalmente, se establece un período de transición de noventa (90) días calendario a partir de la publicación de una nueva versión metodológica, durante el cual los proyectos podrán optar por utilizar la versión anterior.</p>

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		<p>metodológicas en medio del proceso de evaluación de la conformidad.</p> <p>“GHG Project holder has a thirty-days calendar transition period for using the updated version, starting from its publication.</p> <p>If the project holder has already obtained a validation report from the CAB prior to the effective date of an updated version of the Standard or program documents, the project may proceed with registration based on the version under which the validation was conducted.”</p>	<p>Estas medidas aseguran claridad operativa y consistencia técnica en la aplicación de los requisitos metodológicos.</p>