Dear Credible team,

Thank you for the opportunity to contribute to the Credible 2025 consultation. Our feedback reflects hands-on implementation across markets and aims to inform how digital infrastructure can accelerate traceable, cost-effective carbon farming aligned with the CRCF. The following feedback is based on our work designing digital infrastructure for credit-level traceability, automated sustainability reporting, and integration with emerging standards.

In this letter, we provide reflections and recommendations in response to the following five expert reports:

1. Barriers and incentives for sharing input data needed in carbon farming and MRV systems in Europe
2. Earth Observation (EO) for MRV of Carbon Farming
3. Unlocking data for MRV: Data sharing for effective carbon farming
4. Ensuring carbon farming delivers sustainability benefits
5. An effective policy mix for scaling up carbon farming

We share our input based on practical implementation experience and with the aim of supporting the development of effective, transparent, and farmer-accessible carbon farming and MRV systems across Europe. Our experience building MRV infrastructure aligns closely with the data architecture envisioned under the EU Carbon Removal Certification Framework (CRCF). In this submission, we provide actionable suggestions to support CRCF-compatible implementation, especially as it relates to credit traceability, automated disclosures, and co-benefit accounting.

1. Barriers and Incentives for Sharing Input Data in MRV Systems

We support the Credible Focus Group's emphasis on building trust-based, interoperable systems for MRV data exchange. In our work, we have found that data reusability, clear role governance, and version traceability are foundational.

We recommend:

- Structuring data systems so that each data point (e.g., soil sample, land management action, or model output) can serve multiple reporting needs (regulatory, certification, and disclosure), reducing the burden on farmers.
- Including version control and data provenance to improve auditability across time and systems.

- Embedding farmer consent mechanisms and transparent metadata practices to operationalise principles such as "collect once, use many times" and "give something back."

From our experience building sustainability reporting infrastructure across jurisdictions, we have developed MRV systems that:

- Allow stakeholders (e.g. verifiers, credit buyers, regulators) to access only the validated layers of data they are entitled to see;
- Support modular reporting formats, enabling separation of GHG metrics from co-benefits, or partial integration with registries and disclosures depending on context;
- Ensure that every piece of MRV input (e.g. a soil carbon value) is time-stamped, source-tagged, and version-controlled, allowing a full audit trail from field to registry to disclosure;
- Maintain a clear separation between source data and reporting outputs, so that farmers or project operators retain control over raw input while still enabling reliable verification.

These features have proven essential in building trust across actors while keeping MRV implementation costs manageable. Similar principles and systems could support the development of CRCF-compatible MRV architecture in Europe, especially if combined with open guidance and transparent governance standards.

2. Earth Observation (EO) for MRV of Carbon Farming

We support EO as a scalable, non-invasive tool for observation and benchmarking. However, EO should never be used in isolation; on-ground data is essential for contextual accuracy and confidence in credit-level outcomes..

Our feedback:

- EO-derived inputs should be clearly distinguished within MRV reporting systems and traceable back to source. In Demia's infrastructure, externally sourced data, whether from registries or monitoring providers, is tagged and linked to its origin, timestamp, and method of acquisition, helping ensure accountability in reporting, similar capabilities will be highly recommended.
- Where EO data is used to inform credit-level reporting, we recommend that systems include mechanisms to flag such inputs explicitly and disclose how uncertainty is managed, especially in the context of third-party assurance or financial disclosures.

- While Demia does not generate EO data directly, our reporting architecture is designed to integrate external datasets, including EO-derived metrics, where applicable. These are structured and validated through automated workflows that help avoid inconsistencies in reporting across multiple standards or outputs.

- Standardizing EO metadata (capture date, resolution, source ID) is critical for integration into auditable MRV pipelines and credit registries.

EO has strong potential to reduce monitoring costs and increase reporting frequency, but it must be implemented with transparency around its limitations and always paired with systems that allow for traceability and contextual interpretation.

3. Unlocking Data for MRV: Data Sharing for Effective Carbon Farming

In the systems we've worked on, data sharing becomes more viable when it is modular, traceable, and auditable. We echo the recommendation to develop shared governance models and add:

- MRV tools should allow partial disclosures (e.g. only GHG-related variables vs. full sustainability reports) depending on regulatory or market context.
- Records should be linkable to farmer-approved disclosures while protecting sensitive source data.
- Public-facing registries could support layered access models, where regulators, project developers, and buyers see different validated outputs based on permission levels.

In our implementation work, we've found it useful to apply a data trust scoring system, a structured way to assess the confidence level of reported data based on its source, method of verification, and auditability. Such scoring systems can help data consumers (e.g. credit buyers or regulatory bodies) evaluate the robustness of reported metrics and inform decisions without requiring full access to underlying sensitive data. A similar mechanism could be considered for MRV disclosures under the CRCF framework to support transparency without compromising privacy or operability.

4. Ensuring Carbon Farming Delivers Sustainability Benefits

We appreciate the call for carbon farming to support broader environmental objectives. Based on our implementation experience with sustainability-related disclosures:

- Sustainability co-benefits should be separated from GHG outcomes in both verification and communication layers. In practice, we've found this improves clarity for stakeholders and buyers alike.
- Structured reporting templates aligned with existing frameworks (e.g. SBTN or TNFD) can help integrate biodiversity and water indicators at low cost, without overloading farmers.
- A minimal and well-scoped farm environment plan template, developed in partnership with farm advisors, could serve as a low-barrier entry point into co-benefit tracking.

In our work, we've developed systems that allow for the automated generation of sustainability disclosure packages, for example, generating high-granularity reporting required by international registries, matching it to credit-level methodologies, and generating a project-specific summary of co-benefits and safeguards. These types of tools could support the implementation of Sustainability+ labels or optional co-benefit verification under CRCF.

We also recommend incorporating circular value principles into certification and registry design, ensuring that projects which generate carbon and sustainability outcomes can directly access the benefits (financial or otherwise) tied to their verified impacts. For instance, ensuring that revenue from credits flows transparently back to the project level, or that projects receive technical insights, benchmarking, or visibility in return for their reporting efforts.

Finally, a minimal, structured farm environment plan, ideally developed with input from local advisors and pre-aligned with MRV and co-benefit indicators, could serve as a low-barrier mechanism for widespread co-benefit tracking without adding complexity for smaller farms.

5. An Effective Policy Mix for Scaling Up Carbon Farming

From a systems integration standpoint, we observe that many reporting and certification workflows remain siloed across CAP, national registries, and voluntary markets.

We recommend:

- Enabling data re-use across CAP and CRCF systems, where permitted by the farmer, to avoid duplication and reduce MRV costs.
- Developing interoperable formats for practices, emissions, and verification outcomes that can serve both certification and policy monitoring needs.
- Clarifying how credit-generating activities intersect with broader regulatory frameworks (e.g., how a CAP-supported practice interacts with CRCF eligibility and additionality).

Additionally, guidance on the relationship between voluntary and compliance mechanisms would support alignment among buyers, producers, and policymakers.

Final Remarks:

We welcome the opportunity to support CRCF-aligned pilots or contribute to working groups shaping modular MRV data flows, co-benefit integration, and interoperability frameworks. Demia's infrastructure is already being deployed across continents and is well-suited to support European-scale implementation with low friction and high traceability. The insights we have shared reflect our ongoing work building and operating systems that support MRV-aligned credit tracking, automated sustainability disclosures, and structured data governance frameworks in different areas of the world.

In our experience, building MRV infrastructure that is both standardised and adaptable, while ensuring traceability and data quality across actors, significantly improves transparency, reduces costs for verification, and helps align different layers of reporting (e.g. credit issuance, climate claims, financial disclosures). When designed carefully, digital MRV systems also enable feedback loops where data providers, such as farmers or project developers, gain value from their participation, through access to scenario insights, compliance support, or shared revenue mechanisms.

We see opportunities to bring these learnings into future CRCF-related pilots or working groups, particularly around:

- The structuring of modular MRV data pipelines;
- The design of co-benefit-aware reporting flows;
- And the development of interoperability between registries, reporting standards, and policy frameworks.

We would be glad to stay engaged in ongoing discussions around technical architecture, auditability, and implementation guidance for CRCF and beyond.

Kind regards,

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