



# PEFCs feedback on the expert report on “Ensuring carbon farming delivers sustainability benefits” within the Credible Project

July 2025

## Call for a clearer scope definition of the expert report

The expert report has a clear focus on agricultural activities and farmers. However, the report mentions that it is specifically intended for “carbon farming activities on mineral soils”, which could be understood as covering more activities since the Carbon Removals and Carbon Farming regulation is using the term “carbon farming” in a broader sense which includes planting of trees and forest-related activities for example.

We believe it would give more clarity to mention that the expert report focuses on “agricultural and agroforestry activities on mineral soils” to keep the same wording as the CRCF draft methodology and to clearly distinguish these recommendations from other forest-related carbon farming activities.

Similarly, the role for agroforestry is not entirely clear in these recommendations. Agroforestry practices seem to not be included in the scope of this report in a footnote on page 5, but in the draft methodology by the CRCF, agroforestry is included in the same methodology.

If also other carbon farming activities on mineral soils are to be included in the scope of this expert report, it would be helpful if the report further outlines how these proposed approaches will be applied for other contexts, supported by additional engagement with forest stakeholders, and explicitly include forests and foresters in the report.

## Relation with current draft methodology approach

We welcome the tangible proposals for operationalizing the sustainability requirements in an agricultural context as they can serve as inspiration for the forest context. However, it is unclear how the proposals in the expert report align with the four options that operators can use to demonstrate their compliance with the sustainability requirements, as presented in the latest draft CRCF methodologies.

It would be helpful if the report clarifies whether the approach presented in this report is intended to be considered as an additional option or if is connected to one of the four approaches.

## Role for Existing Certification

Many landowners are already covered by credible third-party certification schemes, like PEFC, that enable them to implement and demonstrate their sustainable practices. PEFC has also developed a certification standard for sustainable management of [Trees Outside Forests](#), covering, amongst others, agricultural practices like agroforestry and hedgerows.

We welcome therefore the role that is given in the expert report for “approved sustainability standards” to measure additional sustainability benefits. Although we would like to propose



that existing certification schemes could also be considered for reaching the minimum sustainability requirements (including mandatory co-benefits for biodiversity).

We suggest that the proposed activities should allow operators to use valid certificates from credible third-party certification schemes, which cover activities that have been demonstrated in peer reviewed scientific literature, to demonstrate their fulfilment of the minimum sustainability requirements and/or mandatory co-benefits and/or additional voluntary co-benefits. In this way early movers can be supported, and duplication of administrative burden is mitigated.

### About PEFC

PEFC, the Programme for the Endorsement of Forest Certification, is a leading global alliance of national forest certification systems. As an international non-profit, non-governmental organization, we are dedicated to promoting sustainable forest management through independent third-party certification. PEFC certification covers more than 297 million ha of forests and more than 29.000 companies across the globe. In the EU, 25 countries have PEFC endorsed SFM standards, covering more than 70 million ha or 45% of EU forests.