



Terrestrial Storage of Biomass

2nd Public Consultation Feedback summary

18 August, 2023

Context

Puro.earth held an initial public consultation with the intention to revise its Woody Biomass Burial methodology, now called **Terrestrial Storage of Biomass**. The revision was meant to evolve the methodology beyond the pilot stage and develop the several aspects of significant importance.

This initial public consultation was announced on Puro's home page on June 1st, 2023 and in Puro Newsletter on the same day. The period of consultation was 1st to 22nd June 2023. The public consultation was structured as a set of 10 questions tackling key aspects of the methodology.

After the initial public consultation, the feedback received was considered for incorporation into a revised version of the methodology, which was subsequently submitted to the Scientific Advisory Board of Puro.earth for further feedback in June 2023.

Due to the extensive comments and feedback received, a second public consultation was held from 19th June to 9th August 2023, following the incorporation of the feedback from the Advisory Board. The purpose was to enable the public to review and comment on the extensive changes resulting from the initial public commentary and Advisory Board feedback, before a potential approval of the methodology by the Advisory Board in September 2023.

This document **summarises the feedback** received during the second public consultation, and the revisions included by Puro.earth as a result of the comments.

We want to thank all participants for your time and devotion to co-developing the Carbon Removal Methodologies together with our ecosystem.

Summary of comments received and actions taken:

Comment	Action
Glossary	
New entries	'wet storage' & GWP ₁₀₀
1. Introduction	
Alternative name for storage chamber in subterranean injection.	No change.
Consider alternative types of biomass.	No change.
Change Figure 2.	Changed figure to utilise standard symbols for sediments.
Change to explanation of subterranean injection.	Changed.
Water used for transport of biomass.	Paragraph updated to give a more detailed explanation of this process and why water in the slurry is not as problematic as first thought.
2. General principles of verifiable CO₂ Removals in Puro Standard	
None.	None.
3. Point of creation of the CO₂ Removal Certificate (CORC)	
No comment.	Added list from Microsoft's updated criteria w.r.t guiding principles that project developers should aspire to follow.
4. Eligibility requirements and verification	
Not to require a list of individual species of biomass in all cases.	Changed to focus on proof of eligibility of biomass rather than individual plant species.
If wood is "unmerchantable", i.e. it cannot, or is unable to be sold as lumber, should it not be allowed?	Changed sustainability rule slightly to reflect this inclusion w.r.t forestry operations.
Rule 4.3.2 suggestion to add a fourth design category (burial of pyrolysed biomass).	Too late in the process to add another storage category at this stage. Potentially considered in a future draft.
Rule 4.4.1 clarification	Updated sentence: This includes but is not

	limited to detailing the experimental determination of the storage conditions.
Rule 4.4.4	New rule w.r.t dry conditions monitoring
Rule 4.4.5	New rule w.r.t subterranean injection monitoring
5. Assessment of life cycle greenhouse gas emissions	
5.1.3 suggestion to use GWP ₂₀ for methane	Relates to all methodologies, dually noted but GWP ₁₀₀ retained in this version. The decision needs to be taken at the Puro Standard level and then applied ubiquitously.
6. Calculation methodology for the quantification of CO₂ Removal Certificates (CORCs)	
Allow CO ₂ removal supplier to propose a new values for fraction of re-emitted carbon lost as CH ₄ and CO ₂ (F_{CH_4} and F_{CO_2})	<p>New rule 6.5.8. Allowing CO₂ Removal Supplier to propose new values in case of dry, aerobic storage.</p> <p>Also added rules 6.5.5 (default value for F_{CH_4}) and 6.5.6 (the values of F_{CH_4} and F_{CO_2} depend on one another; default value for F_{CO_2}).</p> <p>Also, slight wording change to rules 6.5.2 and 6.5.3 to include <i>default</i> values for F_{CH_4} and F_{CO_2}.</p> <p>Also, slight wording change to numerical example of CORC calculation in section 6.5</p>
Rule 6.4.4 suggestion to allow measuring of organic carbon content.	Changed to allow measurement of organic carbon content.
7. Management of re-emission risks	
Whether the numbers in the risk table should be multiplied together.	No change as the Table is only illustrative not quantitative.
8. References	
Add new references.	Numerous new references added throughout the document and all included in the reference list.