



## Woodland Carbon Code Clarification 1 to Version 2.2

Publication date: 29 April 2024

### Introduction

This document provides clarity in some areas of the code and offers project developers and validation and verification bodies clear direction on interpretation of the standard. Read it alongside the Woodland Carbon Code Version 2.2. Clarifications are effective immediately.

These clarifications were approved by the Woodland Carbon Code secretariat with input from project developers, validation and verification bodies, and the Woodland Carbon Code's Executive and Advisory Boards. They will be incorporated into the next version of the Woodland Carbon Code. **Requirements** are shown in **green text**. **Guidance** is shown in black. Changes to requirements and guidance are shown in **track changes**.

Scottish Forestry are committed to continuous improvement of the Woodland Carbon Code programme. If you find the requirements of the standard or the guidance are not clear, please email [info@woodlandcarboncode.org.uk](mailto:info@woodlandcarboncode.org.uk) with details of the standard section, and specific text where you require clarity. This will be added to the 'Request for Change' log and reviewed by the WCC Secretariat. If a clarification is necessary, we will review the requirements and guidance and publish further clarifications.

## Contents

Eligibility .....	3
1.1 Key project dates.....	3
1.2 Eligible activities.....	4
1.3 Eligible land .....	<b>Error! Bookmark not defined.</b>
1.6 Additionality.....	5
Project governance .....	7
2.1 Commitment statements .....	7
2.2 Management plan.....	8
2.3 Management of risks and permanence .....	9
2.5 Monitoring .....	9
2.6 Registry and avoidance of double-counting.....	10
Carbon sequestration.....	11
3.3 Project carbon sequestration.....	11

## Eligibility

### 1.1 Key project dates

Question	Answer
<p>What registration dates which applied before 1 October 2022?</p>	<p>We have moved the following from guidance to <b>requirement</b>:</p> <p>*Note registration dates were different prior to 1st October 2022:</p> <ul style="list-style-type: none"> <li>• Between 1 July 2021 and 30 September 2022, projects had to be registered before planting began (or for natural regeneration, the fence was complete or deer control to enable natural regeneration commenced).</li> <li>• Before 1 July 2021, projects had to register within two years of the start of planting (or for natural regeneration, within two years of the fence being completed or within two years of deer control to enable natural regeneration commencing).</li> </ul>
<p>When do I have to validate my project?</p>	<p>We have amended the <b>guidance</b> to provide clarity where planting spans several years:</p> <p>You have a maximum of three years from the date you register to complete validation of your project. For groups it is three years from the date you register the first project in the group. A validation extension can be given in extenuating circumstances, <u>for example if your planting will span 3-5 planting seasons, or planting is unavoidably delayed</u>. Contact the <a href="#">Woodland Carbon Code secretariat</a>.</p>

1.2 Eligible activities

Question	Answer
<p>Is there a minimum project size?</p>	<p>We have added to the <b>requirements</b>:                      From 1 May 2024, projects shall be at least one hectare net planted/regenerating area. Projects smaller than one hectare which were validated prior to this date remain eligible.</p> <p>A project shall be made up of blocks of woodland at least 0.1 hectares net planted/regenerating area, with a minimum width of ten metres, and a stocking density of at least 400 stems per hectare. A project shall span up to five planting years in time.</p> <p>We have added to the <b>guidance</b>:</p> <ul style="list-style-type: none"> <li>• The minimum project size reflects that projects less than 1 hectare are unlikely to be cost-effective under the woodland creation methodology.</li> <li>• If you registered a project less than 1 hectare prior to 1 May 2024 and it is not yet validated, then we will contact you to discuss options.</li> <li>• The minimum block size, width and stocking density reflects the minimum definition of ‘woodland’ across the UK. An agroforestry methodology is under development. It is possible that any tree planting that does not meet these criteria may be eligible under a future agroforestry methodology. It is not possible to ‘pre-register’ for any future methodologies.</li> </ul>
<p>Can you clarify which woodlands are eligible on what type of soil?</p>	<p>We have moved text from guidance to clarify the <b>requirement</b>:</p> <p>Eligible activities shall be those relating to woodland creation <u>on land that has not been wooded in the last 25 years, -on soils that are not organic (i.e. less than 30cm depth peat in England and 50cm depth peat in Scotland, Wales and Northern Ireland)*.</u></p> <p><u>*See Country-Specific Guidance Below.</u></p>

1.6 Additionality

Question	Answer
<p>Is it necessary to demonstrate that carbon finance was considered for older projects?</p>	<p>Yes. We have moved the following from guidance to a <b>requirement</b>:                      Older projects which were registered prior to 1 Jul 2021 and registered after tree planting had started, <del>shall have to</del> supply evidence to confirm that carbon finance from selling carbon units or 'insetting' (creating your own carbon units) was considered in the planning stages of the project (for example the inclusion in minutes of board meetings or planning documents, cashflow or emails).</p>
<p>Do project developers have to commit to 'only selling carbon units which are validated and verified to a standard endorsed in the UK Environmental Guidelines' – on any of their land or any of the projects they are involved in?</p>	<p>In response this question about commitment statements (see also 2.1 Commitment statements), we have also amended the <b>guidance</b> around stacking and bundling different ecosystem service credits on the same site:</p> <p><b>Current situation: <u>Implicitly bundled credits/units</u></b></p> <p>With the Woodland Carbon Code, wider benefits of woodland creation projects are <u>implicitly</u> 'bundled' with the carbon unit when they are sold (i.e. the landowner sells the carbon unit with the other benefits of the project 'attached' or included).</p> <p><b>Future possibilities: stacked credits/units</b></p> <p>In future, it may be possible to 'stack' voluntary credits/units generated from a woodland creation project (e.g. where credits/units are generated for other ecosystem services such as biodiversity or water). <u>Work is underway in collaboration with the Peatland Code, the UK Land Carbon Registry and each of the devolved UK Governments to consider how stacking could function in a future version of the Code, provided:</u></p> <p><u>Mechanisms are needed to ensure stacking does not compromise the integrity of the market, in particular the requirement for projects to demonstrate additionality. A programme of work is planned to enable stacking, including:</u></p> <ul style="list-style-type: none"> <li><u>The existence of a credible voluntary standards/methodology for each ecosystem service in the stack.</u></li> </ul>

Question	Answer
	<ul style="list-style-type: none"> <li>• <u>A mechanism to 'approve' those standards to 'stack' with the Woodland Carbon Code, potentially through the Nature Markets Framework being developed by Defra and the British Standards Institute, with approval from the Woodland Carbon Code Executive Board.</u></li> <li>• <u>Methods for distinguishing bundled projects from stacked projects, including mechanisms to show this on the UK Land Carbon Registry. If other ecosystem credits are held on a different registry, then processes to make this transparent between registries. This will avoid double counting and ensure that claims of the different benefits/credits from a project are clear and explicit.</u></li> </ul> <p><del>These standards/methodologies are approved for use by the Woodland Carbon Code Secretariat</del></p> <ul style="list-style-type: none"> <li>• All income streams are declared in the WCC Cashflow Spreadsheet</li> </ul> <p><del>Claims made are clear and explicit.</del></p>

## Project governance

### 2.1 Commitment statements

Question	Answer
<p>Do commitment statements have to be signed?</p>	<p>Yes, we have moved the following from guidance to a <b>requirement</b>:                      Commitment statements shall include the project name and be signed and dated <u>by the landowner</u>.</p> <p>We have added to the following <b>requirement</b>:                      Where <u>land is owned in trust, or by a company, charity or partnership</u> <del>larger estates are managed by trustees</del>, then either the landowner themselves or the legal signatory or signatories shall sign the landowner commitment statement. <u>Where land is jointly owned, then all joint owners shall sign unless one landowner has authority to sign on behalf of joint owners. Where the signee is not the sole owner, they shall confirm their authority to sign.</u></p>
<p>Do project developers have to commit to 'only selling carbon units which are validated and verified to a standard endorsed in the UK Environmental Guidelines' – on any of their land or any of the projects they are involved in?</p>	<p>No. we have removed the following requirement from the commitment statement <b>requirement</b>:  <del>Project developers ..... shall only sell carbon units which re validated and verified to a standard which is endorsed in the UK Environmental Reporting Guidelines.</del></p> <p>However, we have added further clarification to the 'bundling and stacking' <b>guidance</b> (See section 1.6 Additionality).</p>

2.2 Management plan

Question	Answer
<p>Is it a requirement to follow the mapping rules, and can you provide an example map which follows the mapping rules?</p>	<p>Yes, it is a requirement to follow the mapping rules, we have clarified the <b>requirement</b> as follows and we have provided an <a href="#">example planting map</a> and <a href="#">natural regeneration/colonisation map</a>:</p> <p>We have replaced this requirement:  <del>A Map of the areas being planted</del></p> <p>with the following <b>requirement</b>:            A map. The map shall <u>be clear and</u> align with the WCC mapping <u>rulesguidance</u> and include:</p> <ul style="list-style-type: none"> <li>• A base map</li> <li>• Scale</li> <li>• <u>Name of project</u>Title</li> <li>• Outer boundary</li> <li>• Open ground</li> <li>• Existing woodland and any other areas not accounted for</li> <li>• Fencing <u>and other infrastructure</u></li> <li>• Grid reference</li> <li>• Legend</li> <li>• <u>Sub-compartments</u></li> <li>• <u>Additional requirements for natural regeneration</u></li> </ul>

2.3 Management of risks and permanence

Question	Answer
<p>When do you quantify any reversal?</p>	<p>We have moved the following from guidance to <b>requirement</b>:</p> <p>Should a project experience a loss of carbon, the landowner shall...:</p> <ul style="list-style-type: none"> <li>• <u>Quantify the magnitude of the loss at the subsequent verification/ in the next Project Progress Report</u></li> </ul> <p>We have moved the following from guidance to <b>requirement</b>:</p> <p>If a landowner/manager wishes to change the management regime of their woodland, then the project developer <del>shall</del> <u>notify the Woodland Carbon Code Secretariat</u> immediately and, provided the alternative management regime will maintain the carbon stock already sold, documentation <del>shall</del> <u>be updated via the project progress report at the next verification.</u></p>

2.5 Monitoring

Question	Answer
<p>Can you clarify how we stratify a site and provide a survey plan?</p>	<p>Yes, we have provided clarifications to the guidance in the <a href="#">Survey Protocol</a>.</p>
<p>When do I have to provide a remedial plan?</p>	<p>We moved the following from guidance to <b>requirement</b>:</p> <p><del>In some instances, Ww</del> <u>where corrective actions are not quickly resolved, then the project shall</u> <del>can</del> <u>be verified 'subject to corrective actions being completed', upon provisioned of a Remedial Plan is provided.</u></p> <p>If corrective actions are not resolved and there is no Remedial Plan, then your project <del>shall</del> <u>will</u> either be verified with <u>'Red'</u> status or not verified at all,</p>

2.6 Registry and avoidance of double-counting

Question	Answer
<p>Can you clarify in which circumstances Pending Issuance Units do not have to be issued at validation?</p>	<p>We have amended the <b>requirement:</b></p> <p>Upon validation, Pending Issuance Units shall be listed for all carbon units in the project, <del>except...; in circumstances specified in Registry Rules of Use 5. Listing Pending Issuance Units.</del></p> <p>adding this qualification from the registry rules of use:</p> <p><del>... f</del>For a limited number of projects where predicting the carbon sequestration is more challenging, <del>PIUs will not be listed – these projects can only list</del> verified Woodland Carbon Units <u>shall be issued</u> once the actual amount sequestered is known. This includes:</p> <ul style="list-style-type: none"> <li>• Natural regeneration projects which are very large-scale, or where there is little or no 'baseline' evidence of seedlings regenerating</li> <li>• Woodland creation projects which are planting a species where there is less information about sequestration rates and no 'carbon model' is mapped in the WCC Carbon Calculator.</li> </ul>

## Carbon sequestration

### 3.3 Project carbon sequestration

Question	Answer
Can you provide further guidance on how to account for carbon sequestration in natural regeneration/ colonisation projects?	We have provided in a separate <a href="#">guidance document on natural regeneration</a> , including <a href="#">example maps</a> . This will be incorporated into the relevant sections of the standard at the next update.
Can you clarify how to account for wider spacing (3m, 4m, 5m) in broadleaved and natural regeneration projects?	We have also updated the <a href="#">Carbon Calculator</a> to include 3m spacing for planted Scots pine, 3m, 4m and 5m spacing for Scots pine natural regeneration and 4m and 5m spacing for broadleaved planting and natural regeneration, so project developers no longer need to calculate wider spacing separately. This is calculated a pro-rata basis from 2m spacing for Scots pine and 3m spacing for broadleaves, based on the number of stems per hectare.