

Request no.	Standard	Section/Phrase to change	Chapter	request content / Desired change	Date	Request submitted by	Contact person in charge	
1	Global Construction C-Sink Standard v 0.9	General comment - Alignment with Environmental Product Declarations (EPDs)	0	The EU will require all construction materials to have Environmental Product Declarations (EPDs) that quantify their carbon footprint. Rules already exist to account for the carbon associated from biogenic sources, allowing for a temporary emissions reduction, with re-emissions at end of life. Additionally Biochar Europe is working to have biochar be viewed as a permanent option for carbon removal that can be accounted for in an EPD. For any EU-based project that is using EPDs, it is essential that whether for temporary or permanent removals, that these not be double counted between the EPD structure and the CSI Construction C-Sink Standard.	04/08/2025	Biochar Europe	Matthew Mallory materials@biochareurope.eu	
1		General request for clarification between construction and biochar standards	0	The relationship between the construction C sink and the existing biochar C sink standard is not explicitly defined, leading to confusion about which standard applies to biochar in construction (Pages 38 & 53). More guidance requested as to which standard should be followed when		Biochar Europe	Matthew Mallory	
1		"The Construction C-sink Certification is dedicated for materials that; will not be replaced or demolished before the end of the declared lifetime of the construction."	2	Some of the materials listed will be very challenging to ensure are maintained for the lifetime of the building (e.g. roof, walls, or insulation). The tracking complexity for tracking these materials we expect to have too much overhead for this to be valuable.		Biochar Europe	Matthew Mallory	
1		The Role of the C-Sink M	2	In general, the C-Sink Managers have a lot of overhead in their roles. We encourage this to be reviewed and simplified, as we worry adoption of this standard will be limited otherwise.		Biochar Europe	Matthew Mallory	
1		All fossil CO2 emissions from biomass production to C-sink application must be offset with geological Csinks that result, e.g., from DACCS, BECCS, enhanced rock weathering, and PyCCS.	4	Add in language that for permanent (ref. Annex A1) carbon removals like biochar, deductions can be made through an LCA instead of needing to purchase separate offsets. If storage transitions to soil application due to land-filling, would we need to deduct the 25% as outline in the C-Sink methodology?		Biochar Europe	Matthew Mallory	

		If biochar is used in concrete slabs, the mass and quality of the biochar must be registered for each slab, as well as the total amount of slabs.	9	We are not sure if this is supposed to be "quality" or "quantity" If it is "quality" what quality needs to be reported?		Biochar Europe	Matthew Mallory	
1		"The certifier is obliged to control at least 10% of the certified constructions during the construction process"	9	We are unsure of the reasoning for this and expect 10% control to be far more than reasonable for any building developer		Biochar Europe	Matthew Mallory	
1		For Annex A When used as filler for roadbeds, retaining walls, or landscaping gravel where no binder is applied, the biochar carbon remains protected within the crushed concrete matrix for many decades. However, it will eventually be released into the soil matrix. The application of the filler material is considered the entry point to geology and marks the starting point of the decay curve for soil-applied biochar.	1	Biochar Europe is of the opinion that the soil degradation curve of 25% loss over 1000 years might not be accurate for inert biochars, especially when encased in concrete. We suggest to include the reflectance rate as well as further tiering of H/C ratios to provide for more accurate estimations of high performing inert biochar at 1000 years.		Biochar Europe	Matthew Mallory	

2		If the Construction C-Sink Material biomass is pyrolyzed to biochar and the biochar is applied to soil or to a construction material using cement, lime, clay, gypsum, or geopolymers as binders, the biochar carbon can be certified as a geological C-sink under the Global Biochar C-Sink Standard (Schmidt et al., 2024).	1	Question: Does this mean that biochar C-Sinks can be availed by C-Sink Manager in addition to the Construction C-Sink? How is double counting avoided here?	04/08/2025	Varhad Capital Pvt Ltd	Siddhartha Pakrashi siddhartha.pakrashi@varhad.in	
2		The DMV system can be provided by a third party.	2	The DMRV system can be provided by a third party.		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
2		Only when it was validated that the registered temporary C-sink has existed during a control period, can the global cooling effect of the C-sink that was delivered during this period be used for emission compensation. been delivered this period of time.	3	Some grammatical error, please correct final draft.	04/08/2025	Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
2		effect of an emission, e.g., of the GHG caused by the construction itself, or, if not used for inseting, also for external emissions.	3	There seems to be abrupt start to sentence. Kindly correct In final draft		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	

2		Biochar carbon embedded in construction materials and certified under the Global Biochar C-Sink Standard can be registered as a geological C-sink and retired for CO2 offsets (see also Annex A1, which reprints the detailed chapter on "Biochar-Concrete Construction Materials" of the Global Biochar C-Sink Standard (Schmidt HP et al., 2024)).	3	Comment: In some countries (not unlike India), the construction and demolition debris find their way to landfills. In case biochar is embedded in such debris, would this count as geological C-sink?		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
2		The carbon expenditures of the construction-embedded C-sinks do not include the emissions caused by the production and use of other construction materials such as those from cement and steel production, site excavation, machine use, etc. All those construction-related emissions must, however, be declared and visible in the Global Carbon Register	4	Question: Why is the embodied emissions from construction material production and transportation to building site not accounted. Is this presumed negligible?		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
2		However, the certification of the lifetime emissions of a construction and their compensation is not part of	4	Question: Why is this being excluded from the Life cycle assessment? Is this presumed negligible ?		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
2		0	5	Under list of permitter biomass can biomass waste from Sewage Treatment Plants included in list of approved biomass?		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	

2		Trees from forest gardens, orchard meadows, tree lines, and hedges for arable farming are often decades old. They have to be managed so that the amount of wood removed per unit area does not exceed the amount of the average annual regrowth. It should be monitored at the farm level (c.f., Chapter 5.3Error! Reference source not found.)	6	Comment: Please correct the link error in the final draft.		Varhad Capital Pvt Ltd	Siddhartha Pakrashi	
3		page 21		If organic materials are embedded in construction materials, it can be assumed that the entire carbon content of the construction material remains a C-sink for as long as the material itself persists. Only when the organic carbon-containing material is dismantled, recycled, or (waste-) incinerated can the sequestered carbon potentially be released back into the atmosphere, causing the C-sink to lose its climate value. A temporary C-Sink that got lost, must be retired from the Global Carbon Registry.	02/14/2025	Nicole Sozzi	Carbon Standards	
3		page 22		<p>Sentences are not correct:</p> <p>To ensure that the global cooling effect of a temporary C-sink is effectively delivered, the Global Cooling effect can only be claimed for the past (i.e., ex-post). <b>Only when it was validated that the registered temporary C-sink has existed during a control period, can the global cooling effect of the C-sink that was delivered during this period be used for emission compensation.</b> <b>been delivered</b> this period of time. The global cooling effect certified for the last year can be used to compensate for the global warming effect that an emission has in the present year or had in the past (legacy emissions).</p> <p><b>Example:</b> A building was erected in 2020 with a GHG footprint of 100 t CO<sub>2</sub>e. The building has a wood truss presenting 20 t CO<sub>2</sub>e, compressed straw fiber insulation (15 t CO<sub>2</sub>e), and biochar used in the concrete for the foundation (50 t CO<sub>2</sub>e) and for the walls (15 t CO<sub>2</sub>e). The organic and pyrogenic carbon embedded in the construction materials constitute a temporary C-sink of 100 t CO<sub>2</sub>e. For as long as the building persists, the temporary C-sinks will exist without decay. The GHG footprint of the construction (100 t CO<sub>2</sub>e) can, thus, be entirely compensated by the embedded C-sink of the woody-, straw-, and biochar materials for as long as the construction is unmodified.</p> <p>effect of an emission, e.g., of the GHG caused by the construction itself, or, if not used for in-setting, also for external emissions.</p> <p>The global cooling effect of the construction C-sink for future years (e.g., from today until the end of the expected lifecycle of the construction) is shown as the expected C-sink curve in the Carbon Register. The expected C-sink curve can be traded and registered as a "C-Sink Option." The yearly values of a registered C-sink can be activated and certified annually following the automated monitoring of the construction's existence.</p>	02/14/2025	Nicole Sozzi		
3		page 31		World Climate Farm Standard / Tool – wrong Standards used		Nicole Sozzi		
3			6	Comment: Please correct the link error in the final draft.		Nicole Sozzi		

4		Terminology 'Certification' Adaptations	Through whole Standard	<ul style="list-style-type: none"><li>• Validation</li><li>• Verification:</li><li>• Accreditation</li><li>• Endorsement</li></ul>	09/10/2025	Robin Werren Patrizia Pschera	Robin Werren
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