**German Environment Agency** 

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### Funding climate-friendly soil management – key issues Ex ante vs. ex post crediting<sup>1</sup>

### 1 Background

**Definition**: When mitigation is recognised and rewarded after it has occurred and been verified, this is referred to as **ex post**. However, in some mechanisms, actors are rewarded in advance for the expected level of mitigation their activities will lead to in the future (**ex ante**).

**Importance**: Ex ante crediting comes with risks of under-delivery (where the expected and credited mitigation is not achieved). There is also the risk that ex ante-approved mitigation may not be additional in the future (e.g. due to future regulatory changes) or that it may be double-counted if mitigation is later included in a cap-and-trade scheme. For these reasons, ex ante credits should not be used for offsetting in other sectors or locations. This generates uncertainty and the potential for low environmental integrity, so it needs to be critically assessed. Despite these downsides, ex ante certification is sometimes used in voluntary carbon markets for nature-based solutions, as ex post payments are considered insufficient to incentivise landowners to implement mitigation activities involving high upfront costs or long payback times (Cevallos et al. 2019).

**Relevance:** Either ex ante or ex post crediting can be used in any type of mechanism and to fund any type of mitigation action; this is an open design decision for the mechanism developer and therefore a relevant topic for all mechanisms, regardless of the sector (i.e. land use or other sectors). The risks of ex ante crediting are highest for offsetting mechanisms<sup>2</sup>, where potentially uncertain or non-realised ex ante credits would substitute for mitigation in other sectors.

# 2 Key issues

| Ex post crediting                        | Ex ante crediting                       |                             |
|--|---|-----------------------------|
| <b>Ex post</b>                           | <b>Ex ante – differentiated credits</b> | Ex ante – undifferentiated  |
| Actors are only recognised and           | Actors who implement a mitigation       | credits                     |
| rewarded for mitigation after it has     | action receive credits equivalent to    | The same as ex ante –       |
| occurred and been verified. This         | their expected mitigation impact.       | differentiated credits,     |
| verification can be of differing         | However, these credits are marked       | except actors receive       |
| stringency, depending on the             | as "non-verified", or are otherwise     | standard credits (i.e.      |
| mechanism and methodology,               | differentiated from standard            | credits that are            |
| potentially including site visits,       | credits. For example, mechanisms        | undifferentiated from       |
| measurement and sampling, distance       | such as the Woodland Carbon Code        | verified, ex post-certified |
| observation, or self-reporting. This may | and Gold Standard, create ex ante       | mitigation). This poses an  |
| occur once at the end of the project, or | credits, which can be sold but not      | increased risk to           |

Table 1 Ex post and ex ante crediting: Definitions and strengths and weaknesses

<sup>&</sup>lt;sup>1</sup> This factsheet was also published as part of the UBA report "Funding climate-friendly soil management", available at <u>http://www.umweltbundesamt.de/publikationen/Funding-climate-friendly-soil-management</u>.

<sup>&</sup>lt;sup>2</sup> Under offsetting approaches, the buyer is using the certificates for mitigation outcomes as a substitute for within value chain abatement or mitigation activities in their own sphere and counts it towards their own (voluntary) climate target.

| Ex post crediting  | Ex ante crediting   |  |
|--|---|--|
| intermittently during the crediting<br>period (e.g. every five years). Actors<br>receive payment equivalent to the<br>results achieved by their mitigation<br>activities over the verification period.   | retired as offsets until the projects<br>have been verified, at which point<br>the ex ante credits are transformed<br>into standard credits (Cevallos,<br>Grimault & Bellassen 2019).   | environmental integrity,<br>as buyers can use ex ante<br>credits as offsets. |
| <ul> <li>+ High certainty and environmental<br/>integrity, as mitigation is only<br/>recognised and rewarded when it has<br/>occurred and been verified.</li> <li>- Slow payoff times for actors<br/>implementing mitigation activities, as<br/>they must wait until mitigation<br/>activities have been verified. Given the<br/>slow and long-term nature of many<br/>soil-related mitigation activities, this<br/>can pose a significant barrier to uptake<br/>(Cevallos et al 2019).</li> <li>- Higher transaction costs for<br/>participants and administrators, due to<br/>strict verification requirements.</li> </ul> | <ul> <li>Directly provides upfront funding<sup>3</sup>, which is important for<br/>mitigation activities that have slow pay-off times or require large<br/>upfront investment (e.g. agroforestry).</li> <li>Risk of under-delivery, where the actual mitigation is less than<br/>the mitigation expected (and rewarded) ex ante, either due to<br/>underperformance or discontinuation of the mitigation activity,<br/>or due to future removals being non-additional owing to future<br/>regulatory changes. This risk is high for non-differentiated credit<br/>approaches, though somewhat lower for differentiated credit<br/>schemes. Under-delivery leads to low environmental integrity<br/>(where the total level of atmospheric emissions is higher than<br/>without the mechanism) and low cost-effectiveness.</li> <li>Poor reputation, owing to the risk of under-delivery, associated<br/>with lower demand and lower prices for credits.</li> </ul> |  |
| ource: Authors' own compilation  |   |  |

**Mixed crop-livestock systems** refer to farm-scale systems where livestock and cash crop production are combined to optimise efficiency, commonly delivering mitigation through the application of livestock manure, perennial grasslands, and forage legumes.<sup>4</sup> A hypothetical climate-friendly soil mechanism could reward actors in advance for shifting to mixed croplivestock systems based on an estimate of their expected net soil carbon accumulation and net emissions. **An ex ante system** would reward farmers up front, based on the estimated mitigation expected in the future. Given the complex nature of mixed crop-livestock systems, and the need to dynamically optimise farms to external factors such as changing prices and weather, an ex ante system would be very uncertain. **An ex post system** would reward farmers only once mitigation has been achieved and verified.

**External inputs** involve the application of off-farm organic nutrients or biochar to amend soil.<sup>5</sup> In an **ex ante** system, actors could be rewarded for biochar application upfront at a level equivalent to the amount of biochar they apply (and the carbon storage of that biochar), based upon assumptions about its residence time. An **ex post** system would require verification that the biochar has not degraded (or negatively affected soil carbon stored) before actors are rewarded.

### 4 Relevance for the EU

**EU voluntary certification mechanisms:** Existing voluntary carbon market mechanisms in the EU use both ex ante and ex post crediting systems.

<sup>&</sup>lt;sup>3</sup> Upfront funding can also come through other means, e.g. through futures or other contracts; this also applies to ex post payment approaches.

<sup>&</sup>lt;sup>4</sup> See factsheet on mixed crop-livestock systems, available at <u>www.umweltbundesamt.de/publikationen/Role-of-soils-in-climate-change-mitigation</u>.

<sup>&</sup>lt;sup>5</sup> See factsheet on critical external inputs, available at <u>www.umweltbundesamt.de/publikationen/Role-of-soils-in-climate-change-mitigation</u>

- Ex ante example: The Woodland Carbon Code features differentiated ex ante credits ('Pending Issuance Units', PIU), which are awarded to validated projects based upon their expected mitigation; these credits are converted into verified credits once the mitigation has been verified. The ex ante PIU credits are effectively a promise to deliver mitigation in the future, and they cannot be used to offset other emissions until the mitigation has been verified. There are also limits on how buyers can communicate the purchase of PIUs (McDonald et al 2021).
- **Ex post example:** Verra (formerly Voluntary Carbon Standard) is an international voluntary carbon crediting mechanism covering many mitigation activities, including soil carbon sequestration methods. Actors only receive credits for mitigation activities following verification of their project and its results (McDonald et al 2021).

**Common Agricultural Policy (CAP):** Activity-based payments for implementing climatefriendly soil activities under the CAP are similar to ex ante payments with no verification; landowners are paid to implement activities that are expected to deliver mitigation, with no verification of actual results (Radley et al. 2021).

## 5 Addressing challenges

As explained in Section 2, **ex ante crediting creates risks for environmental integrity**. A number of potential solutions have been identified, such as **buffer accounts**, where certificates associated with a certain percentage of the expected ex ante mitigation are held back (e.g. 20%). This buffer is then drawn down to cover under-delivery of already credited projects. However, the simplest and best solution is to rely on the more certain ex post crediting, which does not pose the same risks as all credits are verified.

**Some solutions have also been suggested to cover upfront costs or slow payback times**, including mechanisms offering upfront support (such as training) and hybrid approaches, which consist of upfront payments with top-up ex post payments or adjustments based upon results achieved (Radley et al 2021). Alternatively, differentiated ex ante credits reduce the risks.

## 6 Relevant literature

Cevallos, G.; Grimault, J.; Bellassen, V. (2019): Domestic carbon standards in Europe Overview and perspectives (INIS-FR--20-0664). I4CE, France. Available at https://www.i4ce.org/wp-core/wp-content/uploads/2020/02/0218-i4ce3153-DomecticCarbonStandards.pdf.

McDonald, H.; Bey, N.; Duin, L.; Frelih-Larsen, A.; Maya-Drysdale, L.; Stewart, R.; Pätz, C.; Hornsleth, M.; Heller, C.; and Zakkour, P. (2021): Certification of Carbon Removals: Part 2. A review of carbon removal certification mechanisms and methodologies. Prepared for European Commission DG CLIMA under contract no.40201/2020/836974/SER/CLIMA.C.2 Environment Agency Austria, Wien, Reports, Band 0796. ISBN: 978-3-99004-620-3. Available at https://www.umweltbundesamt.at/fileadmin/site/publikationen/rep0796.pdf.

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