EcoEngineers (Roxby Hartley)

EcoEngineers strongly supports CARB's proposed QAM framework and its efforts to establish a credible certification process for carbon management projects. We are particularly encouraged by CARB's willingness to draw on recognized methodologies and provide a route for eligible projects that are not covered by existing CARB protocols. This is an important step toward bringing a broader range of carbon removal and storage approaches into a consistent framework with clear regulatory oversight.

Our support reflects extensive experience working with CARB staff and California's climate programs, including more than 300 fuel pathway applications. EcoEngineers is a CARB accredited verification body for the Low Carbon Fuel Standard, Mandatory Reporting Regulation and Compliance Offset Program, with the latter two supporting California's Cap and Invest Program. Through this work, we understand the technical scrutiny, documentation and independent verification needed to make carbon accounting credible.

That experience has also shown us the importance of methodologies that can be applied and audited in practice. Reliable certification depends on clear project boundaries, defensible calculations, traceable data and monitoring requirements that allow an independent verifier to substantiate the reported outcome. These are central to the quality of our audit work and to the confidence that regulators, project developers and buyers place in carbon markets.

Recognized methodologies offer CARB a substantial body of scientific and practical experience to build upon. Drawing on that work, while retaining CARB's review and approval authority, can reduce duplication and give eligible projects a clearer route through certification. We welcome the breadth of approaches contemplated in the proposal, including nature based, marine and biomass carbon removal and storage, alongside engineered approaches.

We appreciate the work CARB staff have undertaken to develop this framework and welcome the opportunity to contribute our experience in methodology development, carbon accounting and independent verification as the proposal moves forward.