



GHR005

Public Comments and Response

October 2025



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Public Comments and Response Summary

The methodology entitled **GHR005 Methodology for Assessing Emission Reductions from Rice Cultivation** was developed by the Global Heat Reduction Registry (GHR). All methodologies published by GHR are subject to a rigorous review process that includes soliciting feedback from expert reviewer as well as the general public before they are approved.

GHR005 was available for public feedback from August 27, 2025 to October 17, 2025. Comments received during this period, along with the authors' responses, are documented here. References to specific sections in the public comments correspond to the version released for public review.

Comment Summary and Response

Comment No.	Name/ Organization	Reference	Comment	GHR Response
1	AgriCapture	Section 3.2.2	Does GHR have a set penetration rate for which they would consider an agricultural practice meet the common practice threshold? It's unclear in the current documentation what would be considered eligible. CAR SEP uses a 50% adoption rate while Verra uses a 20% adoption rate.	To remain consistent with the common practice threshold proposed within Article 6.4, a threshold of 20% has been added to the methodology additionality requirements.
2	AgriCapture	Section 8.3	It's unclear why a project generating nonreversible emission reductions would be subject to a buffer pool deduction.	We agree that these emissions reductions are non-reversible. However, as there are other reasons why the integrity of a carbon credit could be questioned, we favor a conservative approach and require a buffer pool deduction.
3	AgriCapture	General	GHR should specify whether they plan to allow project developers to migrate existing projects from other registries to this methodology. Explicitly allowing for this migration enables project developers to migrate towards	We agree project migration is a worthwhile addition to this methodology. We plan to address this in a future version.

			quality indicators (such as a CCP label).	
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