

Response to public consultation comments on the Modular Methodology for Climate Change Mitigation Activities on Forest Lands and Wetlands



Version 1.0

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Dear participants,

CERCARBONO extends its sincere thanks for your feedback on our public consultation on the "Modular Methodology for Climate Change Mitigation Activities on Forest Lands and Wetlands", conducted electronically from 03.11.2022 to 02.12.2022.

These valuable comments will allow us to generate a more complete and robust methodology document for developers and formulators of REDD+ and wetland mitigation activities to participate under our carbon market certification Programme.

As soon as we have the new version of the methodology, we will inform you. However, the methodology document will be available on our website.

The table below details the different comments received and their respective responses from our technical staff, which will also be available on our website in the consultation section.

We thank you once again for your time spent in your review and your valuable contribution.

Yours sincerely,



Carlos Trujillo Echeverri
CEO Cercarbono

Note to the English version of this document: All comments from the public consultation were received in Spanish. If there are any errors in the translation of the comments, the responsibility lies with us.

No.	Comment	Document section	Response
1	Comment: Are vegetation associations in forests and forested wetlands considered? For example, "guandales", "cativales", etc. Are there eligibility criteria for different vegetation types in forested wetlands?	Introduction. Page 10	To decide what are wetlands, the methodology includes a document "00 - Parameters for Modular Methodology Segments V 1.1" which defines what is meant by wetlands and how to establish whether a specific ecosystem is a wetland or non-wetland (please note that the content of this document will be included in a subsequent version of the document " Terms and Definitions of the Voluntary Certification Programme of Cercarbono "). In short, if the country has an explicit official wetland map, the areas defined there are wetlands. Failing that, areas that meet the definition of wetlands established by the RAMSAR Convention are wetlands.
2	Comment: Are uncertainty discounts associated with the type of information used for emission factors and activity data?	Principle of reliability. Page 13	Yes, see Section 9 - Uncertainty, risks, and non-permanence of the methodology.
3	Comment: Does the methodology differentiate between planned and unplanned deforestation and/or degradation?	Purpose and scope of the methodology. Page 24	Not explicitly. However, planned deforestation and degradation would lead to different drivers and drivers and different models for projecting deforestation and degradation than if the drivers were unplanned.
4	Comment: Is additionality of projects in protected areas or areas legally linked to forest or wetland conservation ensured?	Additionality. Page 32	This issue transcends methodology and depends on the specific circumstances of the protected areas. A generic answer is not possible. In principle, activities that are required by law are not additional, but there may be specific circumstances that allow the additionality conditions as defined in the Cercarbono's Tool to Demonstrate Additionality of Climate Change Mitigation Initiatives to be met.
5	Comment: Are criteria included to consider leakage as zero?	Estimation of total net GHG emission reductions or GHG removals. Page 36	Yes, see details in Section 4.4.1- Potential leakage area of the methodological module F-NW-def. The other modules related to deforestation and degradation (not yet developed) will have similar criteria.
6	Comment: Are the sources of FREL information, such as IDEAM and SMByC for Colombia, accepted?	Annex 4. Sources of further information. Page 63	Yes, in fact, FRELs, because they are official, are the preferred sources for the development of this type of projects. If the purpose of the credits is the non-causation of carbon tax in Colombia, the use of these sources is mandatory.

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7	Comment: Are deviations to the methodology allowed?	NA	In the case of possible methodological deviations, it is possible to propose them to Cercarbono, as established in its Cercarbono's Certification Programme Procedures document. If approved, they can be considered in the design and implementation of the corresponding CCMP.
8	Comment: Are deviations from the validated Project Description allowed?	NA	It is difficult to give a generic answer, as this will depend on the extent of such deviations. Just as it could be a drafting issue or a minor change, it could be, for example, changes that affect substantial aspects of the project. If a project has deviations that affect its general description, you can report them in the monitoring report. The corresponding template includes a related section. It will be up to the VVB in the first instance to determine whether the changes reported by a project are valid or not within the framework of the current Cercarbono rules.
9	Comment: Can the land cover analysis for the generation of the change matrix consider at least the Forest - Non Forest classification?	Map cross-referencing and changes in land covers. Page 8	Yes, a forest-non-forest classification could be considered, provided that the weighted carbon stock calculation of post-deforestation land covers is adequately supported.
10	Comment: How is additionality demonstrated?	Identification and calculation of the segment baseline scenario. Page 10	As indicated in Section 6 of the methodology, additionality is demonstrated using Cercarbono's Tool to Demonstrate Additionality of Climate Change Mitigation Initiatives .
11	Comment: Are emission factors to be aligned with the FREL, and are biome data acceptable for Colombia?	GHG emission factors. Page 19	Yes, in both cases. In fact, FRELs, because they are official, are the preferred sources for the development of this type of projects. If the purpose of the credits is the non-causation of carbon tax in Colombia, the use of these sources is mandatory.
12	Comment: What is the validity for using forest inventory data, and how often should the inventory be carried out?	Monitoring the implementation of the proposed activities proposed for the segment. Page 33	As stated in Section 6.2 - Monitoring the Implementation of the Proposed Activities for the F-NW-def Methodological Module Segment, <i>"If the data used for the emission factors applicable to the segment are derived from the host country's FREL, the CCMP shall use those factors. If a more recent version of the FREL defines updated values, the CCMP shall update the calculations in the verifications using these updated values."</i>

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			<i>If the data used for the emission factors applicable to the segment come from forest inventories and it is evident that there are no significant changes in emission factors in the monitored categories of the baseline scenario, the emission factors used in the project scenario should be the same and a forest inventory does not need to be repeated.</i> The other modules related to deforestation (not yet developed) will have similar criteria.
13	Comment: Is the CDM A/R Methodological Tool applicable for REDD projects?	Emissions monitoring Page 34	CDM has several tools generically called "A/R Methodological Tool" (e.g., for soil organic carbon, for burning and fires, leakage). Their application will depend on the relevance to the methodology. For example, the tool related to emissions from burning and fire would be applicable.
14	Comment: Are criteria and processes for forest degradation included? Fragmentation analysis.	NA	Not in the current state of the methodology, as REDD+ modules have only been developed for deforestation; however, in a degradation module (to be developed), these criteria and processes should be considered.
15	Comment: The following eligibility condition is not consistent with the methodology module: "Must be inland, non-forested wetlands with organic soils, in accordance with the guidelines presented in the document Determination of the parameters for the definition of the segments of the Modular Methodology for Climate Change Mitigation Activities on Forest Lands and Wetlands." For the eligibility condition of forested wetlands, it is important to provide a definition that allows the areas in the segment to meet wetland condition that maintains its natural functions, hydrological conditions, sedimentation, and native vegetation. For wetlands, it is important to highlight in the eligibility condition "Implementation of mitigation activities in the segment must not cause disturbance to natural forests", that the segment activities must	Eligibility of areas and establishment of spatial limits Page 6	The comment is correct. The quoted text appears in two modules: Methodological module MMBH-14 (deforestation and drainage of non-forest inland forested wetlands on organic soils) and MMBH-18 (change of use and drainage of non-forest inland wetlands with organic soils). Indeed, in the first case the condition is incorrect. It will be corrected in the final version of the module. The definition of wetland (forested and non-forested) was presented in the consultation version of the document "00 - Parameters for modular methodology segments V 1.0" which defines what is meant by wetlands and how to establish whether a specific ecosystem is a wetland or non-wetland. However, the content of this document (without modifications), will be included in a subsequent version of the document "Terms and Definitions of the Voluntary Certification Programme of Cercarbono". Regarding the fact that the activities of the segment should not lead to alterations in water regimes of the project area or hydrologically connected areas, the suggestion is noted and will be inserted in the final version of the methodology.

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	not lead to alterations in water regimes of the project area or hydrologically connected areas.		
18	Comment: With regard to dead wood and coarse and fine detritus, it is a pool that in wetlands is subject to water flows.	Considered carbon pools. Page 17	The comment is correct. The option to include this pool in the wetlands segment has been removed.
20	Comment: The following description is not consistent with the methodological module: "In the segment of reducing GHG emissions from deforestation in non-wetland areas, activity data should be monitored annually over the years of the result period, in the segment area and in the potential leakage and leakage management areas (which is defined at project level and not at segment level). What is the validity for using forest inventory data, and how often should the inventory be conducted?"	Monitoring the implementation of the proposed activities proposed for the segment. Page 33	This will be clarified in the final version of the methodology. Activity data (deforestation, degradation) require annual monitoring for the calculation of credits. Regarding carbon stocks per hectare in pools (emission factors), these are considered to be constant.
21	Comment: Are criteria and processes for forest degradation included? Fragmentation analysis, definition of degraded wetland.	NA	Not in the current state of the methodology, as REDD+ modules have only been developed for deforestation; however, in a degradation module (to be developed), these criteria and processes should be considered.
22	Comment: Footer not consistent with the title of the methodological module.	NA	The comment is accepted and will be corrected in the final version of the module.
24	Comment: Is the minimum mappable area for this module also dependent on the definition of forest?	Collection of cartographic information Page 7	Indeed, as stated in Section 2.3.1, <i>...for compatibility with other segments, the minimum mappable area, understood as the minimum unit of interpretation of mapping sources and corresponding to the working scale, should be equal to the minimum size set out in the forest definition of the country where the CCMP is implemented.</i>
27	Comment: Monitoring is described for forests and not for non-forest wetlands.	Monitoring and quantification of results: monitoring of carbon stocks, monitoring of	The monitoring of non-forest wetlands is presented in Section 6, Monitoring and quantification of results of the NB-HI-Org-luc module.

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		leakage management areas, monitoring of leakage Pages 33 34	
28	Comment: Deforestation term not applicable to the methodological module.	Pages 13, 16 to 18, 25, 26, 31, 33 to 35	The comment is correct. The text has been adjusted for the final version of the methodology.
31	Comment: In addition to the Ramsar wetland maps and definition, it is important to provide an ecological definition that allows the segment areas to meet a wetland condition that maintains their natural functions, hydrological conditions, sedimentation, and native vegetation.	Determination of wetland status. Page 2	What is indicated in the comment does not correspond to the definition of wetland; it is rather a condition that should be requested from projects. The text was reinforced in this sense where relevant in modules F-IW-Org-def and NB-HI-Org-luc.
32	Comment: Are there specifications for sampling by which soils in the project area can be characterised to demonstrate the condition of organic soil or mineral soil?	Determination of organic or mineral soil condition Page 3	The definition of organic soil was presented in the consultation version of the document " 00 - Parameters for Modular Methodology Segments V 1.0 " which defines what is meant by organic soil and how to establish whether a specific soil is organic or not (although the content of this document will be included in a following version of the document " Terms and Definitions of the Voluntary Certification Programme of Cercarbono "). No explicit specifications are set out for sampling to demonstrate organic soil status, but Box 1, presented in that document and taken from IPCC 2006 is sufficient to determine the variables that would have to be monitored for this purpose.