

**Response to public consultation comments
on Methodology M/LU/F-A02 For the
Implementation GHG Removal Projects
Through Reforestation, Forest Restoration
and the Woody Agricultural Crops
Establishment**



Version 2.1

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the Implementation GHG Removal Projects Through Reforestation,
Forest Restoration and the Woody Agricultural Crops
Establishment**

Dear participants:

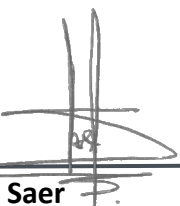
Cercarbono wants to extend its sincere gratitude for your participation in the public consultation of *Methodology M/LU/F-A02 For the Implementation GHG Removal Projects Through Reforestation, Forest Restoration and the Woody Agricultural Crops Establishment*, version 2.1, carried out electronically from 26.07.2024 to 26.08.2024.

These valuable comments will allow us to be producing a more complete and robust methodology document to enable GHG removal initiatives' holders or developers of reforestation, forest restoration and establishment of woody agricultural crops, can participate in Cercarbono's voluntary carbon certification programme.

As soon as the final version of the methodology, integrating applicable comments, is published and publicly available at our website, you will be informed.

The attached table includes a compilation of all comments received, as well as the respective responses developed by our technical area. Such table will be available at our web site, section: Consultations.

Cordially,



Alex Saer
CEO Cercarbono

No.	Comment	Document Section	Answer/ clarification
1	When referring to "human intervention, such as harvesting", would only logged areas whose primary purpose is timber harvesting be considered? Or does it also apply to deforested areas with the purpose of establishing other land uses, such as agriculture, livestock, mining, etc.?	Terms and definitions: Forest definition.	In the "forest" definition, corresponding wording is used in the strict sense where areas that even when they do not meet such definition, due to different situations that have occurred in a certain context, such as harvesting, are also recognized, but categorized as unstable forest. Therefore, these areas must be considered within the in the area eligibility analysis for implementing actions in non-stable forest areas. Please consider, the implementation of the CCMP shall not cause disturbances to stable forest or areas categorized as forests. Deforested areas, mainly due to human intervention, are categorized as other land uses, which shall be justified.
2	Please clarify the text. Stable forest is not a cover; It is a condition (of permanence) of the coverage. In addition, if it corresponds to the area that "remains" with a cover "different" from that of stable forest, are we not talking about the same thing that is defined in the NON-FOREST term? Please clarify.	Terms and definitions: Non-stable forest definition.	The methodology, with the aim of classifying the different covers present in forests, includes the definition of: stable forest; non-stable forest and non-forest, which are related to the forest cover (or its condition) in a given period of time. In that sense, it allows identifying the areas where the forest restoration activity can be implemented, that shall be defined by the CCMP. Considering the above, when referring to a NON-FOREST area, reference is made to an area that does not have any woody cover, while NON-STABLE FOREST areas are those that have disturbed forests and have reduced their coverage without completely disappearing.
3	Please expand the definition and differentiate regarding the "Forest concept " in that same section.	Terms and definitions: Forest land definition.	Forest lands correspond to a category of land use that aligns with the definitions of forest and non-stable forest under this methodology, so that under this methodology it is possible to identify areas that can be dedicated to forest restoration, areas that can potentially meet the "forest" definition. Meanwhile,

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			the "stable forests" areas are used only as a reference, but they cannot be used since they are not supported by the scope of this methodology. The stable forest cover is supported in Cercarbono's REDD+ methodology. Therefore, in general, it is expressed that the definitions have been generated in an articulated manner in space and time to avoid overlaps and double counting of mitigation results.
4	Please include in the definitions and explain the difference between the terms "Reassessment", which is used throughout the text, and "Revalidation" which is used in the following paragraphs: Page 20: The spatial boundaries of the segments considered in the CCMP may change during its implementation, only when areas are added or removed, for which the CCMP shall be revalidated . Page 47: If during a reporting period a participant withdraws from the CCMP, it is necessary to update the PDD, explaining that the calculation of previously issued credits, corresponding to the area that belongs to the holder who has withdrawn from the project must be revalidated.	Terms and definitions	The comment will be taken into account in the final version of the methodology. In general, it is explained that the validation process involves the review of an independent third-party to adjustments made to the CCMP design, but the re-evaluation implies a process inherent to the project activities that shall be performed by the CCMP holder or developer to assess if the implementation and its anticipated results are consistent with reality, which shall be justified in the monitoring report and reviewed by the VVB. The reassessment may suggest that the CCMP should be revalidated, but that is not always the case.
5	Please expand the reevaluation definition. According to the text, the reevaluation shall be performed in case of occurrence of changes in GHGs net removals. However, it should be noted that net removals are not constant and can easily vary on a year-to-year basis. As currently described, it could be understood a re-evaluation of the baseline could be required every year.	3 Objective and application field	Thank you for the comment. In the previous one, some elements in response to this question were included, but to further clarify the situation, the comment will be considered in the final version of the methodology.
6	In that, 30% of the CCMP area, may I use a single native species, as a monospecific plantation ? Or what is the minimum number of native species to be used?	3.1 Scope a) Reforestation.	The variety of native species that can be used will depend on the floristic inventory present in the project area, therefore one or more species may be

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			established, if they are native. No limits on the type or number of species are imposed.
7	Which sources are allowed to use as a reference for the reforestation rate at the subnational or national level?	3.1 Scope a) Reforestation.	Acceptable sources are those generated by government environmental agencies or similar official entities of the country the CCMP is implemented in.
8	If one of these two rates is higher than 5% and the other is lower, how is it determined whether the activity can be established or not? Please clarify in the text.	3.1 Scope a) Reforestation.	If the rate is higher, the activity cannot be established since that becomes part of a country's regulatory framework. Guidelines at the subnational level are usually aligned with what is nationally established, although they contain more specific elements. Therefore, it is not common for the subnational level to establish guidelines below the national ones in this regard, what may occur is that at the subnational level they establish guidelines that have not been established at the national level. It may also occur that a certain country has not established reforestation rates at the national or subnational level, as this depends, among others, on policies implementation of, management and budget.
9	Does the 30% of the area of the CCMP that should remain with forest cover correspond to, and only to, to areas planted with native species? Or can it also correspond, totally or partially, to areas with exotic (non-native) species?	3.1 Scope a) Reforestation.	The 30% of the CCMP area that shall remain as forest may include, but not be limited to, native species, the idea being shall strengthening/restoring forest cover. This will be further addressed in the new version of the methodology.
10	Natural or passive restoration can occur by vegetative propagation (regrowth) and germination from the seed bank. According to the methodology text, is restoration only allowed from the growth of sprouts? In other words, would it only apply to species that have this type of propagation? Please clarify.	3.1 Scope b) Forest restoration.	Thanks for this comment, this will be clarified in the document body. In the case of forest restoration, it may be carried out by means of artificial practices (reseeded by transplantation of plants generated in nurseries) or by regrowth if the native species present(s) this characteristic.

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11	According to the definition, forest restoration is not for future forest harvesting purposes. Due to this, the referenced phrase is prone to generate confusion.	Terms and definitions Forest Restoration and 3.1 Scope b) Forest restoration.	The methodology indicates that this activity does not lead to forest exploitation since it is intended for the conservation and recovery of ecosystem services in such areas.
12	Please clarify what you mean by 10% max. soil disturbances. Does that refer to 10% of the surface? ● According to the text, "the practice of inversion of the soil at a depth greater than 25 cm is allowed." This statement is confusing; or does it mean that "NO" soil inversion is allowed at a depth greater than 25 cm? ● Please provide with some examples of friendly and sustainable practices the text refers to.	4.1 Area eligibility	Soil disturbances (10%) refer to the surface where the CCMP is implemented. Meanwhile, inversion practices at a depth greater than 25 cm refer to vertical tillage practices (such as chiseling or subsoiling) that do not cause damage to the soil, as they do not generate exposure to environmental conditions and loss due to erosion. In line with your request, examples of friendly practices will be included in the document.
13	Is soil drainage not allowed even though it is historically a common practice in the territory?	4.1 Area eligibility	What is established in the methodology is referred to wetland areas, where this practice is not allowed. Nevertheless, in agricultural lands, soil drainage is a practice that should be conservatively considered as a source of GHG emissions if it is extensively used in the land or otherwise justification shall be provided if deemed as negligible if it does not have significant impact. Therefore, it all depends on how extensively it is implemented in the subject area.
14	Please improve definition of "environmental protection areas" concept. Are they areas of the national, regional or local system of public protected areas? Are private (areas) also included?	4.1 Area eligibility	The comment will be considered in the final version of the methodology.
15	It is possible that the CCMP is not developed on the project holder's own land but that its use has been given to him, it has been, given on bailment, etc., for the development of the carbon project and he has been granted the rights to the benefits generated by it.	4.1 Area eligibility	It is mandatory for the CCMP presenting evidence that supports legal ownership of the areas and documentation demonstrating the rights for CCMP implementation and on achieved GHG removals- or reductions' management. Therefore, the holder of the areas is the one who is legally entitled to perform the CCMP implementation.

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16	Does the methodology consider as eligible areas those generated by transforming natural ecosystems?	4.1 Area eligibility	The determination of eligible areas depends on the multi-temporal analysis the CCMP presents, it can include areas resulting from ecosystem transformations (non-forest areas), but they must meet the eligibility criteria.
17	Please review wording, as "the expected effect of these on reforestation, restoration or implementation of woody crops" is confusing.	6.3 Temporary limits CCMP duration or useful life.	Thank you for this comment, your clarification will be considered in the final version of the methodology.
18	It is suggested that the maximum is 5 years, in line with the need to reassessment the baseline every 5 years.	6.3 Temporary limits Verification times.	The comment will be considered in the final version of the methodology.
19	It is suggested to change the word "measured" to "assessed", considering that underground biomass cannot always be measured and in most cases an estimate is made by means of extrapolation.	6.4 Carbon pools	Thank you for this comment, it will be considered in the final version of the methodology.
20	Why is the underground biomass associated with the shrub component not included? Why is dead wood and leaf litter not included in the reforestation activity?	6.4 Carbon pools Table 5. Carbon pools.	The inclusion of underground shrub biomass such as dead wood and leaf litter will be assessed by the technical team and, if warranted, it will be included in the document.
21	Why is non-CO2 included in the project scenario when a fortuitous event is generated (natural or anthropogenic)? Is any percentage considered insignificant? Or are they included regardless of magnitude?	6.5 GHG emissions sources Table 6. GHG emissions sources considered.	We will review this comment in the document.
22	According to the explanatory text, for the project scenario, burnings are only allowed if they are accepted by law. However, in Table 6 that is not clarified, generating confusion. An asterisk is suggested in the Table or a footnote mentioning such exceptions.	6.5 GHG emissions sources Table 6. GHG emissions sources considered.	The comment will be considered for clarification in the final version of the methodology.
23	The text clarifies that burning is not allowed in the reforestation and restoration processes for site preparation, however, in table 6 it is mentioned that non-CO2 is conservatively excluded.	6.5.1 GHG emissions from biomass burning and fires	The comment will be considered for clarification in the final version of the methodology.

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	This generates confusion so a clarification is requested.		
24	What are the implications of the fact that the average net carbon decrease in the baseline scenario shall not exceed 20%?	6.6 Generic process for estimation and reassessment of baseline and project scenarios	In line with the principle of conservatism, this condition is established so that when generating results by the reevaluation of this scenario, it does not conduct to results overestimation in the project scenario.
25	Why can't the average net carbon increase exceed 20% of the total established in the project scenario, which limits the scalability of the project, if successful?	6.6 Generic process for estimation and reassessment of baseline and project scenarios	As explained in the previous response, it is established as a guideline in line with the principle of conservatism.
26	Is high secondary vegetation in the restoration activity eligible or ineligible? It is not mentioned.	7 Baseline scenario Table 7. Eligible and non-eligible coverages in the baseline scenario.	The comment will be considered in the final version of the methodology.
27	Please clarify the "Transitionally" term	7 Baseline scenario Table 7 footnote.	The term will be clarified in the final version of the methodology.
28	Here it is expressed "up to a specific year", when in all previous descriptions reference is made to "in year t". The former refers to a cumulative value up to year t, whereas the latter refers only to removals in year t. Please clarify as it is prone to generating confusion.	7.1 Carbon stock estimation	Thank you for this comment, that will be clarified in the final version of the methodology.
29	It is suggested to make uniform the use of the COS or SOC abbreviation to refer to organic carbon in soil	8.1 Carbon stock estimation	Thank you for the comment, the consistency of the use of this abbreviation throughout the document will be reviewed, noting that the use of acronyms as per in English language has been established by convention.
30	Please expand the explanation on why the monitoring of the new areas is done during the next 3 years, if it has been previously assumed that no leaks occur after 5 years. How does it work in practice?	8.3 Leakages	This situation will be clarified in the final version of the methodology.

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31	In the text, please clarify what is meant by “monitored annually”; some variables are not monitored with that frequency.	8.4 Estimation of gross and net average removals from the project scenario or its corresponding re-evaluation	This situation will be clarified in the final version. of the methodology.
32	Please clarify what is referred to as continuously monitored on the sentence “CCMP GEI emissions shall be continuously monitored to be properly considered in reassessments and verifications”.	8.4 Average gross estimate and net removals from the project scenario or its corresponding reassessment	Thank you very much for this comment, it will be considered in the final version of the methodology.
33	Does maximum potential apply equally to the three project types under this methodology? In a restoration project, credits generated do not correspond to the net removals achieved through the implemented activities? It is suggested to consider that due to the nature of the restoration project, the maximum mitigation potential is not considered. If what is presented in Figure 2 has been correctly interpreted, at an intermediate-advanced stage of the project, it may not be increase in removals; however, the project’s net accumulated removals would be sustained for a longer time, so the average net removals increase. Could the project trade these credits? Which vintage would they correspond to?	8.4 Average gross estimate and net removals from the project scenario or its corresponding reassessment	Thank you for these comments, they will be analyzed by the technical team to address this comment in the final version of the methodology.
34	Page 46. $RanP = (RagP - RanBL) - (ETP + EBL + LKP)$ This equation is wrongly numbered, according to the consecutive numbering it would not be no. 1	8.4 Average gross estimate and net removals from the project scenario or its corresponding reassessment Equation 1.	Thanks for the comment, the equations’ numbering consistency will be reviewed in the final version methodology.
35	According to Equation 7, the RanBL is calculated as: $RagBL - EBL$ ● Shouldn't Equation 24 be as presented below, if RanBL is used?:	7.3 Estimation of average gross and net removals from the baseline scenario or its corresponding reassessment 7 and 24 Equations.	Thank you for this comment, the equation as proposed on it would only discount the EBL from RanBL, generating an overestimation, and related to the second equation, it is equivalent to the one

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	<p>$RanP = (RagP - RanBL) - (ETP + LKP)$</p> <ul style="list-style-type: none"> • Or should Equation 24 not be as it is? presented below, when using RagBL?: <p>$RanP = (RagP - RagBL - EBL) - (ETP + LKP)$</p> <p>Please clarify and confirm.</p>		proposed in the methodology. Anyway, the technical team will carefully review this comment.
36	Comment similar to the previous one, proposed for misnumbered equation 1 (it should be equation 24).	8.4 Estimation of the average gross and net removals of the project scenario or its corresponding reevaluation Equation 25.	Thanks again for the comment; consistency of equations' numbering will be reviewed in the final version of the methodology.
37	The last paragraph on page 45 is repeated in the first paragraph on page 47	8.4 Average gross estimate and net removals from the project scenario or its corresponding reassessment	Thanks for this comment, detected will be reviewed in the final version of the methodology.
38	<p>If during a certain reporting period a participant withdraws from the CCMP, it is necessary to update the PDD, in which it is explained that the calculation of the credits that have been previously issued and that correspond to the area belonging to the holder who has withdrawn from the project must be submitted for revalidation? Such area cannot be considered in the calculations for the next verification and an amount equal to the corresponding credits that were issued previously is discounted from the total mitigation to be reported in the next verification.</p> <p>According to the above text: If an instance withdraws after reaching the Maximum mitigation potential, how are credits discounted?</p>	9.1 Addition and exclusion of grouped CCMP areas	Thank you for this comment, that will be clarified in the final version of the methodology.
39	<p>According to the above text: What happens to the verifications or the project once the maximum mitigation potential is reached?</p>	9.1 Addition and exclusion of grouped CCMP areas	Thank you for the comments, these situations will be considered by the technical team in the new methodology version.

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40	Please clarify in the text how the subject PDD update is done. For example: <ul style="list-style-type: none"> ● It is carried out in the monitoring report as a methodological deviation. ● A new version of the PDD is delivered. 	9.1 Addition and exclusion of grouped CCMP areas	The new PDD version must be subject to validation and verification. Methodological deviation does not apply if there is no condition of the methodology that is being altered or cannot be applied as indicated therein.
41	The requirements of this methodology seek that in every component of the quantification, precise and accurate results are obtained from the CCMP, resulting from rigorous application of the principles. However, by the very nature of the GHG removals, these are considered not to be permanent, since they come from cycles of planting and harvesting, which can be affected by internal and external events (such as disasters, land-use changes, infrastructure developments). According to the nature of a restoration project and its definition in the methodology, it does not contain harvest cycles, so this paragraph should be clarified.	10 Risks and non-permanence	Thanks for the comments, that's right, this will be clarified in the final version of the methodology.
42	Is the reporting of contributions to the SDGs not mandatory, then? From this paragraph, you might think that is the case, that it is a plus and that you will have a seal of differentiation for it.	12 Contributions to UN's Sustainable Development Goals	Thank you for this comment. SDGs reporting is mandatory; the comment will be considered to clarify it in the final version of the methodology.
43	Removals and associated GHG emissions must be monitored continuously, throughout their implementation period. GHG removals can be monitored annually or less frequently, while GHG emissions should be monitored more frequently, depending on the GHG emission sources identified. For verification events, it is required that carbon stock estimates are based on field measurements. For the Intermediate years between verifications, monitoring can be carried out through direct field measurements or through projections of recent field	14 Monitoring and quantification of results	Thank you for this comment, it will be considered in the final version of the methodology.

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	<p>measurements performed by means of conservative and duly supported models.</p> <p>In the previous text, please clarify:</p> <ul style="list-style-type: none"> • What does it mean that GHG emissions should be monitored more frequently (than annually)? More than once a year? In which cases would it apply? 		
44	<p>In the previous text, please clarify:</p> <ul style="list-style-type: none"> • What would happen with these measurements once the maximum mitigation potential has been reached? 	14 Monitoring and quantification of results	Thanks for this comment; guidance on this will be provided in the final version of the methodology.
45	<p>In the previous text, please clarify.</p> <ul style="list-style-type: none"> • Please clarify what a conservative model is. Is the model that is statistically more robust (based on the available data) and whose biological significance is in accordance with what is expected from the process to be projected not preferred? A conservative model could be one that proposes, in this case, zero removals. 	14 Monitoring and quantification of results	The use of conservative models is prompted, when there is a lack of data from direct field measurements or projections, which implies that removals or emissions represent what would happen, or a more conservative scenario; nevertheless, any value generated by the model, as well as the use of a certain model, must be supported.
46	As explained in Section 8 and in particular in Figure 2, the maximum possible net removals achieved by the CCMP is calculated as the average net removals over its duration. This is not expressed in Figure 2. There is mention of net removal, average net removal, and time to request the release of the individual carbon stock. There is no reference to such maximum potential.	14.3.2 Calculation of net removals achieved by the SCMP during the verification period	Thanks for the comment, that Figure will be revised.
47	Check the EBL,x sign, as it is considered it should be negative; in addition, parentheses should be eliminated.	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Equation 26.	Thank you for the comment, preliminarily it is considered to be correct as it is; nevertheless, it will be assessed by the technical team and if warranted, the comment will be considered in the final version of the methodology.

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48	Please clarify in the table what the acronyms R, FR and WAC refer to.	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Table 11. Monitoring variables.	Thanks for the comment, a footnote will be included in the table clarifying they refer to project activities.
49	Abtree _{i,t} : Average biomass per hectare in eligible stratum <i>i</i> at the start of the CCMP in year <i>t</i> . Shouldn't the carbon stock to be assessed be specified: aerial, underground, shrubby? Or does it mean all of them, in summary? Does the methodological tool correspond to this variable?	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Table 11. Monitoring variables.	The equation variable corresponds to the above-ground tree biomass reservoir. Its use within the methodology will be highlighted.
50	ADAt: Land Area from which displacement of agricultural activities attributed to the implementation of the GCCP in year <i>t</i> takes place. Please check the wording. It is suggested that it refers the area of land towards which the displacement occurs.	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Table 11. Monitoring variables.	Thank you very much for this comment, it will be clarified in the final version of the methodology.
51	BagForest: Default above-ground biomass in the forest, in the region or country where the CCMP is located. What is the purpose of this variable? Is it really important for an ARR project? If so, is it fully defined?	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Table 11. Monitoring variables.	Its use will be reviewed and highlighted as applicable within the methodology.
52	Bshrub _{f,s,t} : Above-ground shrub biomass of segment <i>f</i> component of segment <i>s</i> in year <i>t</i> , in the corresponding baseline, project or re-evaluation scenario. Is the definition of this variable not almost the same as that of Bshrub _{f,s,t} ?	14.3.2 Calculation of net removals achieved by the CCMP during the verification period Table 11. Monitoring variables.	Thank you very much for the comment, this variable will be reviewed for consistency.
53	If the CCMP is in Stages 3, 4, and 5 (validation, verification and certification), the CCMP will be able to implement the methodology it initially chose from the program different from Cercarbono if it is in force and authorized by Cercarbono; otherwise, you must use this methodology. In these stages, credits will be issued based on the selected	19 Transition regime for the use of other methodologies	Thank you very much for the comment, in the event of a transition during stages 3, 4 and 5, Cercarbono's technical team will evaluate the methodology used up to that point and will generate the relevant comments or a request to use the current methodology.

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	<p>methodology (from the program other than Cercarbono).</p> <p>Please clarify: If it is in force within the standard or for Cercarbono? If it were the latter, what are the methodologies of other standards in force or authorized by Cercarbono? Is there an associated document for its identification or is it analyzed on a case-by-case basis?</p>		<p>Currently, the methodologies approved by Cercarbono are those from the CDM. Apart from them, this situation is reviewed on a case-by-case basis.</p>
54	<p>Kindly Do connect us with right persons we have very good Technologies and methodology.</p>	<p>Non specific</p>	<p>Thanks for the information, our contacts are found at Cercarbono's website.</p>
55	<p>Dear Cercarbono responsables. The reforestation definition as per in the new methodology, aiming for 30% of native species, is an obstacle to the economic viability of carbon projects. While a minimal percentage of native species in a reforestation project is an excellent environmental practice, such a percentage is excessive, given that in the current market environment it is necessary to use fast-growing species to be viable given the high capital cost of initial investments, and the need to achieve pay-back in a reasonable period from a financial point of view. In addition, since fertile soil is a scarce resource for which carbon capture projects compete with other critical uses for society as a whole (agricultural and livestock use, or biofuel production), it is essential to optimize its use, which is achieved through the use of high-yielding species, some of them non-native.</p> <p>It would also be necessary to distinguish reforestation projects where there was forest in the past – and where the criterion of using species similar to the previous ones makes more sense – from afforestation projects of soils with a previous use other than forestry, where this requirement is nonsense.</p>	<p>Terms and definitions 3.1 Scope a) Reforestation.</p>	<p>Thank you for the comment, this will be assessed by the technical team and if warranted, decreasing this percentage could be considered, notwithstanding, it is outlined that the species to be implemented must be approved by the institution in charge of the plant genetic material, it is understood that the most feasible from an economical standpoint is using fast-growing species, but in environmental and effective terms and long-term removal, it is clear that native species remove more GHGs per unit area and therefore the implementation of species that achieve this environmental scope is required.</p>

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	We hope you take these comments into account.		
56	<p>The terms and definitions contained in the document present greater clarity and coherence, in the same way, the activities covered by the methodology present a definition very much in line with the scope of the methodology.</p> <p>Page 18. 6 delimitation of the CCMP: The definition and delimitation of the spatial and temporal limits is explained in a more illustrative way with examples, it is more detailed than the previous version, which results in the reader being able to comply with the requirements in the CCMP, in addition to being aligned with the spatial context and regional realities. Page 48;49. In the case of the sections referring to contributions to the United Nations Sustainable Development Goals and Safeguards, although it is redirected to the relevant documents and tools, it is necessary to describe and explain the importance that the activities of the program or project contemplated in the GCCC will not generate a net damage in social aspects, environmental, economic, or legal over surrounding areas or communities.</p> <p>The sections corresponding to effective participation, consultation and quality management are of great relevance since they make visible and guarantee the participation of ethnic and local communities and are aligned with national regulations and the voluntary carbon market; The process of data quality management and mapping is explained in a concrete way.</p>	14.5 Monitoring of contributions to the Sustainable Development Goals	<p>Thanks for the comments, this new version aims to making more clear understanding the way it is used by holders or developers quite clear.</p> <p>Regarding the SDG tool, it is being updated so that it is more understandable at the level of the sector in which the project is developed, such as this land use project, it will be available shortly.</p> <p>In the same way, Cercarbono's regulatory document on safeguards has recently been generated, which includes provisions this type of project must follow; they are not as restrictive as they could be for REDD+ projects but they provide guidance to explain how safeguards shall be applied in any type of project.</p>
57	<p>Table 1. Program or project activities likely to be included by the CCMP holder or developer.</p> <p>When it is mentioned that the forest restoration activity includes a \set of actions that lead to the</p>	<p>3.1 Scope</p> <p>Table 1. Program or project activities likely to be included</p>	<p>Thank you for the comment, what you are highlighting is the definition of the restoration activity, which once the project decides to implement must be supported by actions that lead to its</p>

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	establishment of woody tree and shrub species without future forest use,\" does it refer to direct and indirect actions? For the verification of said activities, the ideal is that there is an accurate indicator of quantification and a goal to achieve during the project's life, as well as a schedule of activities for its realization. Commonly, there are no quantitative indicators for indirect activities such as socialization, planning, and training reported by project developers.	by the CCMP holder or developer.	development (planning, socialization and monitoring) established in the PDD and that directly, the species and their effective growth as well as their comparative projection (quantification) generate their mitigation results in the monitoring report verified by the VVB.
58	First of all it seems to be a very solid and well-prepared methodology \M/LU/F-A02\". Great to have it in public hearing and it is needed on the market.	Non specific	Thank you for the comment, it is important to make it public to receive comments allowing for its support and strengthening.
59	Secondly it is an advantage to have reforestation, forest restoration and woody agriculture in one methodology.	Non specific	Thanks for the comment, we try to make it as comprehensive as possible.
60	We have tried to evaluate the methodology in several countries to clarify whether it in reality can capture relevant and additional activities. A public authority could decide to implement the project in a region and most often the detailed mapping will not be done upfront for the entire CCMP. The identification of sites and implementation of specific activities will be on-going over several years and this be a typical situation for the potential activities in this draft methodology. This typical situation with be most suitable to Chapter 9, group project, in the methodology. Maybe it could be illustrated how this handled in a time-perspective, where you have implementation over several years.	9 Grouped projects	Thank you for your comments. We have developed it considering its international scope and applied to specific contexts of a given country in accordance with its current regulatory framework. The purpose of the grouped projects section is to develop activities of this type, at a single country level; its implementation time sequence is implicit in the proposed development plan. In any case, clarification on the ways in which this type of grouped projects can operate will be provided in the final version of the methodology.
61	It is mentioned: \" Non-forest: corresponds to surfaces not having forest coverage. It shall be demonstrated they have not had forest coverage for at least ten years prior to the CCMP start date\"	Terms and definitions	Thank you for your comment, the classification of non-forest and its definition is considered to spatially delimit the areas, so that in the spatial-temporal analyses you can distinguish between one another. In

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	<ol style="list-style-type: none"> 1) Forest coverage is not defined. 2) A typical situation will be that an area has few trees, maybe few procent, which can be seen on the 10 year old map. Do we have a minimum acceptable procentage of already existing trees 		<p>that sense, non-forest is an area that evidently does not contain forest cover and therefore does not reach the definition of forest in the 10 years prior to the start of the CCMP. Therefore:</p> <ol style="list-style-type: none"> 1) A definition of forest cover could be included, but it is implicit in the definition of forest already given. We will review if it applies. 2) As exemplified in the definition of No forest, it includes areas that have not reached the definition of forest adopted by the country in the previous timescale (10 years).
62	<p>It is mentioned: \"Establishment of woody agricultural crops: corresponds to GHG removal due to the establishment or exploitation of perennial woody species of tree and/or shrub type, as long as the species are native, naturalized or approved in the country where the CCMP is implemented. This activity can only occur in areas with non-forest surface.\"</p> <ol style="list-style-type: none"> 1) What is the requirement to the land before establishing woody agricultural crops ? 2) Possible to have some woody agricultural crops already in the selected area, like few trees ? 3) do we have the 10 years requirement with no trees ? 	3.1 Scope	<p>Yes, it may only be established in areas other than the forest category, as has been established for non-forest areas.</p> <ol style="list-style-type: none"> 1) The requirements are set out in the sections: 3.1 Scope, 4.1 Area eligibility and is exemplified in Table 7 of Section 7 Baseline scenario. 2) Yes, as long as it does not meet the definition of forest, nor does it correspond to primary or secondary forests (see definition for natural forest). 3) The requirement is 10 demonstrable years without forest cover or natural forest.
63	Several authorities are proposing to plant trees along roads. Is this suitable for this methodology?	Non specific	They should bear in mind that if the guidelines obey a national mandate, it may not be additional.
64	<p>The statement \"At least 30 % of the CCMP area established due to this activity must be dedicated to forest conservation throughout its useful life\"</p> <ol style="list-style-type: none"> 1) how do you define forest conservation? and why 30%? 	<p>Terms and definitions</p> <ol style="list-style-type: none"> a) 3.1 Scope b) Forest restoration. 	<p>As stated in the previous question, we consider that these are reforestation actions rather than restoration, since the surface is of a linear type. However, the methodology allows the establishment in non-forest areas to achieve the definition of forest and justify that the project actions are oriented towards it.</p>

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			1) A definition of forest conservation will be established to understand the scope of the methodology. 30% is established as a restrictive measure, to achieve ecological stability, whose percentage should really be 100%.
65	When do you expect to have this methodology operational?	Non specific	It is estimated that the new version of this methodology will be available by November, this year.
66	Will it be acceptable to use the draft methodology, if we start developing the project now according to the CERCARBONO standard?	Non specific	It is suggested to use its draft submitted for consultation, considering the changes to be incorporated in its final version, in this way the project will be more aligned with the guidelines of the voluntary international carbon market. Notwithstanding, the subject CCMP shall be presented for registration, aligned with the final version of the methodology.
67	Do you plan to extend the minimum period from 30 to 40 years? What is the maximum project duration you allow?	6.3 Temporary limits	Thanks for the comment, we are not sure if you are referring to the accreditation period, which for now is maintained and the duration of the project may be equal to or greater than 30 years. We do not have a maximum project duration set.
68	In the event the project involves reforestation on land that was used for cattle raising and does not have forest or shrub cover, but only pasture, can it be worked with a baseline equal to zero?	6.3 Temporary limits	Thank you for the comment, in case of presenting areas where livestock activities were generated, they must be classified as non-forest areas and comply with the guidelines described in the eligibility section. In the case of the baseline scenario, it must consider the biomass component that makes it up, including herbaceous or shrub cover present in line with our principle of conservatism, therefore it cannot be established as zero. However, this situation will be clarified in the new version of the methodology.
69	I understand that measuring soil organic carbon is optional, so there can be a baseline of zero if there are only grasses present on the ground.	6.4 Carbon pools	Carbon Organic soil is a carbon pool optional as established in the methodology since its measurement is quite complex. However, if this

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			carbon pool is contemplated in the project scenario, it must be considered as a baseline. At baseline, it must be considered if this reservoir has undergone changes and if it is not contemplated, what must be justified is that its content is not considered for project activities, but in no way can it be said that it is zero, since it is not credible. Please refer to previous response.