

Response to the Comments from the Public Consultation on the CM-LU-002 Integrated methodology Reforestation, Forest Restoration, Revegetation and Establishment of Woody Agricultural Crops



**Version
3.0**

Response to the Comments from the Public Consultation on the Methodology CM-LU-002

Dear participants,

Cercarbono extends its sincere gratitude for your participation in our public consultation of **CM-LU-002 Integrated methodology Reforestation, Forest Restoration, Revegetation and Establishment of Woody Agricultural Crops**, version 3.0, conducted electronically from 07.07.2025 to 08.09.2025.

These valuable comments will allow us to produce a more complete and robust methodological document so that holders and developers of GHG removal initiatives can develop projects or programs of reforestation, forest restoration, and establishment of woody agricultural crops, and participate in Cercarbono's voluntary carbon certification program.

The attached table includes a compilation of the different comments received, as well as the corresponding clarifications and responses developed by our technical area. This document will remain publicly available on our website, section: Consultations.

We again express our gratitude for the time dedicated to the review and for your valuable contribution.

Sincerely,



Alex Saer
Chief Executive Officer

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1	According to Cercarbono's response in document C-084-2025¹: Based on the FA V3.0 Methodology, the Baseline Guidelines, and the current version of Cercarbono's Protocol, it is established that: "The withdrawal of areas by an owner or participant in the CCMP must be total; partial withdrawals of areas are not permitted." (Section 9.1) Reason for this restriction: The methodology, the guidelines, and the protocol maintain this criterion to protect the traceability, environmental integrity, and accounting transparency of grouped projects. Allowing partial withdrawals could generate operational and methodological difficulties, especially in: • Determining with precision the remaining balance of removals attributable to each activity. • Avoiding risks of double counting or erroneous accounting of credits already issued. • Ensuring the coherence of historical carbon inventories, since baseline, removals, and stock calculations are built upon defined and fixed areas from the start. This limitation responds to the need to maintain robust environmental accounting, avoiding scenarios in which partial changes could result in distortions or disputes in the allocation of removals and credits. Nevertheless, we acknowledge the validity of your comment: in Colombia and other countries, the reality of land tenure is complex and dynamic, and may involve: • Partial sale of properties. • Segregation of areas within the same plot for legal, productive, or family reasons. • Changes in ownership without affecting the technical continuity or permanence of the plantations.	Section 9.1 Addition and exclusion of grouped CCMP areas	Cercarbono appreciates and values the detailed technical analysis presented, as well as the practical evidence derived from the implementation of the referenced CDC Project. In accordance with the CM-LU-002, the Baseline Guidelines, and Cercarbono's Protocol, the prevailing principle is that "the withdrawal of areas by an owner or participant in the CCMP must be total; partial withdrawals of areas are not permitted." This criterion is maintained in the current version based on the following foundations: 1. Traceability and accounting transparency. 2. Risk of double counting. 3. Environmental integrity and consistency with previous verifications. In this regard, Cercarbono recognizes the technical effort and the proposal of the CCMP developer regarding: • The cartographic delineation at the level of the Forest Management Unit (FMU), • The differentiation between individual and collective emissions/removals, • The potential use of anti-overlap or land-cover monitoring systems, as currently being reviewed by Cercarbono, • The application of internal compensation mechanisms in response to partial or total losses.

¹ The reference is maintained, as it does not interfere with confidentiality aspects, since it corresponds to an internal filing number.

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	• Others. The FA V3.0 methodology does not disregard this reality, but to date it maintains the criterion of total withdrawal for methodological caution and traceability requirements. Comment: The restriction prohibiting partial withdrawals of land areas by owners within a grouped project is excessively restrictive in light of the operational reality of projects and the dynamic context of land tenure in Colombia. The experience of XXX², developer of the CDC-XX project entitled “Programmatic Associative Project Andean Zone and Atlantic Coast – FCG,” has represented a successful case in terms of grouped project management. Complying with the principles of the certification standard and the commitment to ensure a fair and equitable distribution of carbon credits generated by removals within a grouped project, a rigorous compensation strategy has been implemented in recent verifications to address the loss of plantation areas. This strategy seeks to neutralize or mitigate the impact of areas that have partially or totally exited the project due to causes such as: • Permanent deductions: Correspond to areas that definitively exit the project due to causes that limit their reestablishment as forest plantations. These areas may no longer contribute to GHG removals within the project. They include: Infrastructure, Human settlements, Roads, or Areas with legal disputes regarding land tenure. In cases of land or forest canopy sales, the new owner has the right to decide whether to remain part of the CCMP. If they choose not to continue, a permanent deduction of the sold area is made; if they choose to		Based on these considerations, Cercarbono provides the following responses: A. Evaluate the possibility of calculating removal balances at the FMU level to allow partial withdrawals within grouped projects: Methodologically, it is neither possible nor verifiable to support withdrawals at the level of the Forest Management Unit (FMU), since this unit has an administrative and operational character, not a cartographic one. The lowest spatial level recognized by the methodology and by Cercarbono’s registry systems is the Minimum Mappable Unit (MMU), which constitutes the verifiable and auditable boundary for tracking removals, losses, or withdrawals. Therefore, the evaluation of partial withdrawals must be carried out at the MMU level, defined as the minimum homogeneous area in terms of land use, cover, type of activity, and ownership, whose minimum extent allows a reliable and verifiable cartographic representation through remote sensing. B. Avoiding risks of double counting or erroneous accounting of credits already issued: The observation is valid and aligns with the principles of integrity and traceability of the certification system. However, the verification of the absence of double counting cannot be conducted at the FMU level, as it does not represent a verifiable cartographic unit

² The reference to the author of the comment is removed for confidentiality reasons, as well as the project’s CDC.

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	remain, the participation contract is transferred. This type of situation reflects the usual dynamics of land tenure in Colombia and should be considered within the methodology. • Temporary deductions: Apply to areas that have undergone forest harvests within the verification period. These are eligible areas available for future planting and may continue contributing to GHG removals during the crediting period. • Methodological deductions: Derive from technical requirements or specific conditions of the certification methodology. They do not necessarily represent a total loss of the plantation area but must be excluded for technical reasons. These deductions include: Areas below the minimum mappable unit and other adjustments required by Cercarbono's methodology. In the associative project, when partial cartographic deductions of plantation areas are identified during the monitoring period, and the owner still maintains a portion of the standing plantation with positive increments in carbon stock, this remaining portion can compensate for the negative impact caused by the deducted area, being classified as an "individual emission." However, in cases where the positive removals of the remaining area do not fully offset the emissions generated by the partial loss, the uncompensated deficit is proportionally redistributed among all other project strata according to their share in GHG removals, being considered a "collective emission." In cases where the loss of area is total, meaning that the owner no longer has standing plantations generating		nor has a unique spatial correspondence within Cercarbono. C. Ensuring the coherence of historical carbon inventories: The principle presented is correct but must be reformulated according to the methodologically valid scale: inventory and removal coherence can only be maintained if adjustments are made at the MMU level, not at the FMU level. The historical inventory, removal time series, and baseline projections are calculated over fixed and georeferenced surfaces. Consequently, any modification—whether withdrawal, loss, or reclassification—must: - Be applied to previously registered MMU polygons, ensuring that the accounting adjustment affects only the withdrawn surface. - Recalculate the historical carbon balance (tCO₂e) of the affected MMU, documenting the change as an emission associated with a partial withdrawal. - Integrate the adjustment into the project's total balance, differentiating between: 1) Individual emissions/removals: those attributable to the holder whose polygon was withdrawn. 2) Collective emissions/removals: those exceeding the holder's compensatory capacity and affecting the grouped project as a whole. - Ensure temporal traceability: all adjustments must be recorded with cut-off and verification dates to

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	removals, the impact is directly assumed as a collective emission affecting the project as a whole. Accordingly, the operational and methodological difficulties mentioned in CERCARBONO's response can be managed as follows: A. Determining with precision the remaining balance of removals attributable to each activity. Within grouped projects, the georeferenced cartographic delineation of plantation areas belonging to a specific landowner can be clearly identified. This allows each Forest Management Unit (FMU)—defined as a specific combination of owner, planting year, and established forest species—to have an associated removal history. In the event of a partial withdrawal, the portion of removals attributable to the withdrawn area and the deduction relative to the remaining plantation area of the same owner can be accurately isolated. B. Avoiding risks of double counting or erroneous accounting of credits already issued. Partial withdrawal of an area may include a specific technical review where the VVB approves that the GHG removal balance associated with it presents no double counting. Additionally, if a landowner withdraws an area from the project—whether totally or partially—this area must be included in EcoRegistry's Anti-Overlap System to prevent new credit issuances on withdrawn areas. C. Ensuring the coherence of historical carbon inventories, since baseline, removals, and stock calculations are built upon defined and fixed areas from the start. When an FMU is partially withdrawn, its historical contribution to both the carbon stock inventory and the baseline must be documented and deducted. This		maintain correspondence between historical inventories and verified removals. Therefore, based on the above, Cercarbono confirms that it is not possible to support partial withdrawals at the FMU level, as it does not constitute a verifiable cartographic unit. Analyses and balances must be carried out at the MMU level, which is the operational and verifiable scale recognized by the methodological system and spatial monitoring standards. Consequently, under the current methodology, partial withdrawals are not permitted. However, the future feasibility of controlled partial withdrawals is not ruled out, but their implementation must go through a formal methodological validation phase in which: - The MMU is defined as the minimum reference unit for cartographic and accounting purposes. - Guidelines are established for inventory adjustments for partially withdrawn areas. - Cartographic modules are integrated into EcoRegistry for automated control and traceability. - VVB verification is required for each partial withdrawal. Some of these clarifications are part of the update of the Guidelines for Mapping Presentation and Analysis. Others are part of Cercarbono's planned development goals. Cercarbono values technical proposals that contribute to strengthening the integrity and applicability of methodologies. In this regard,

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	deduction is first applied to the remaining areas associated with the same owner, treated as an individual emission. If the remaining area fails to offset such contribution, the deficit is distributed as a “collective emission” among other project participants, as described above. While we share the interest in ensuring the integrity and traceability of projects, we consider that there are sufficient technical and administrative tools to manage partial withdrawals of areas under strict control without compromising the accounting of carbon stocks in grouped projects. The current restriction prohibiting partial withdrawals may discourage current and potential landowners from participating, as it limits the possibility of including new plantings. Conversely, allowing partial withdrawals under well-defined technical criteria would promote the continuity, scaling, and sustainability of climate initiatives. Therefore, we request that this restriction be reviewed in light of Colombian territorial realities and available cartographic inputs, promoting greater adaptability.		holders and developers are encouraged to proactively submit formal requests for complementary evaluation or development, including technical inputs, cartographic databases, and field experience supporting the feasibility of controlled partial withdrawals. Such initiatives may be considered within methodological review processes or supervised pilot tests, in coordination with the technical team and in accordance with Cercarbono’s procedure for updating documentation or tools.
2	Requirement for conservation areas: at least 10% of the total area of the CCMP must be identified and managed to protect and enhance biological diversity, and may include both native and functional species as well as other conservation measures (See Section 4.1 of the Methodology V3.0). Footnote #15: It may be integrated by the eligible area and/or by the non-eligible area corresponding to the stable forest (provided that the CCMP identifies areas of stable forest within the CCMP boundaries). Although biodiversity conservation is a fundamental objective in carbon projects, making it mandatory to	Section 4.1 Area eligibility	The minimum 10% area requirement for conservation is maintained in version 3.0 of the methodology due to its structural role within the criteria of environmental integrity and consistency with the biodiversity safeguards of the Climate Change Mitigation Programme (CCMP). It is stated as follows: “At least 10% of the total area of the CCMP must be identified and managed to protect and enhance biological diversity, and may include both native and functional species as well as other conservation measures. This percentage may be integrated with the eligible area and/or the non-

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	designate a minimum of 10% of the total area as a conservation zone may represent a considerable burden for small and medium-sized reforesters or farmers. This requirement could force the sacrifice of a significant portion of the productive area, affecting the economic viability of the project and discouraging participation in mitigation initiatives, especially in grouped or small-scale schemes. In some regions of the country, the proportion of non-eligible areas does not reach 10% of the total CCMP area, making it difficult to comply with the minimum requirement established for conservation. In addition, the concept of “area for conservation” presents technical ambiguities, as it is not clearly defined whether it should refer to zones of strict conservation (without productive use) or whether sustainable management areas may be included. Although it is permitted to include non-eligible areas as conservation zones, these are not considered in the carbon quantification nor are they subject to monitoring. The removal of this mandatory requirement is requested for FR projects.		eligible area corresponding to stable forest (provided that the CCMP identifies areas of stable forest within its boundaries).” Therefore, the methodology does not require that the 10% come exclusively from the productive or eligible area, but rather allows the incorporation of non-eligible areas (stable forests, corridors, riparian buffers, protection zones) within the project boundary. The purpose of the requirement is not to restrict production but to ensure the minimum existence of measures aimed at conservation and the maintenance of essential ecological functions such as connectivity, water regulation, habitat, and erosion control. The 10% area requirement for conservation is maintained as a general reference for environmental integrity but should not be applied rigidly. In cases where the CCMP does not have sufficient areas to reach this percentage, the developer must demonstrate equivalent actions or strategies aimed at biodiversity conservation and strengthening, such as: • Revegetation of edges and corridors, • Sustainable management of marginal areas, • Functional restoration, or • Complementary measures for soil and habitat protection. In the final version of the CM-LU-002 Integrated methodology Reforestation, Forest Restoration,

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			Revegetation and Establishment of Woody Agricultural Crops, the wording will be adjusted to prevent it from being interpreted as a rigid or restrictive obligation, especially since the intent is to ensure an equivalent environmental action aimed at biodiversity, not necessarily a fixed proportion.
3	In version 3.0 of the methodology, it is not clear what the term “IPDD” refers to. Everything indicates that this is a typographical error and that it actually refers to the “IPCC.” Clarification is requested. On the other hand, in Table 5 it is indicated that the soil organic carbon (SOC) pool may be considered if it shows significant accumulation, or excluded in a conservative manner. Likewise, on page 28 it is stated that “this carbon pool shall only be included if time series or robust comparative data are available, real improvements attributable to the intervention of the CCMP are projected, and/or accepted quantification methods are applied (for example, field and/or georeferenced sampling and laboratory analysis).” Based on the CDM Tool AR-Tool 16, it is estimated that the soil organic carbon content increases over a period of 20 years, and therefore an annual estimation of this pool could be considered based on this assumption, taking into account that the quantification of this pool using field data involves high costs for the project.	Table 1. Variables to record and/or for monitoring presence of soil organic carbon (SOC)	Cercarbono confirms that the term “IPDD” corresponds to a typographical error and that the correct reference is “IPCC” (<i>Intergovernmental Panel on Climate Change</i>). This correction will be incorporated into the final version of the methodology. Regarding the inclusion criterion for the SOC pool and the threshold for “significant accumulation”: The text in Table 5 indicates that soil organic carbon (SOC) may be included only if significant accumulation is demonstrated, or excluded in a conservative manner. The methodological intent is to avoid overestimations in pools with high uncertainty and sampling costs. Cercarbono adopts, in accordance with the IPCC (2006), the following guiding criterion: “Significant accumulation” shall be considered when the average annual change in SOC (ΔSOC) is equal to or greater than $0.5 \text{ tC ha}^{-1} \text{ year}^{-1}$, or when the 95% confidence interval of the estimate does not include 0 (i.e., there is statistically significant evidence of an increase). The AR-Tool 16 (CDM, v2.0.0) establishes that soil organic carbon content may increase during the first

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			20 years after the establishment of a plantation or revegetation until reaching a new equilibrium. In line with this tool, Cercarbono considers it methodologically valid that, when no direct measurements or time series are available, CCMPs may conservatively estimate the annual SOC increase using a 20-year accumulation curve parameterized with empirical or default factors (IPCC Tier 1 / Tier 2), provided that: - The use of local or regional parameters is justified, - Data sources and assumptions are documented, - It is demonstrated that the method avoids overestimations (principle of conservatism), and - The VVB verifies the traceability of the model and its alignment with project conditions. This approach will be included in the <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector.</i>
4	Page 72. Section 14 Monitoring Procedure: The GHG removals and emissions associated must be continuously reviewed and evaluated throughout the entire implementation period. GHG removals may be monitored annually or at a lower frequency, while GHG emissions must be recorded and monitored at a higher frequency, according to the identified GHG emission sources.	Section 14 Monitoring procedure	The wording of Section 14 aims to distinguish between the continuous nature of the technical monitoring of the CCMP and the formal frequency of the monitoring events reported to Cercarbono. The term “continuously evaluated” does not imply uninterrupted or permanent monitoring; rather, it means that the holder or developer must maintain a constant system of observation, recording, and control over the variables that may affect GHG removals or emissions, ensuring data traceability and consistency. According to the CM-LU-002: GHG removals may be monitored annually or at a lower frequency (for

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			example, every 2 to 5 years), depending on the dynamics of vegetation growth and the design of the sampling plan. GHG emissions (associated with sources such as fertilization, fuels, machinery, or fires) must be recorded more frequently—generally annually or per event—to accurately reflect their temporal variability. This approach is consistent with the IPCC Guidelines (2006), which establish that the monitoring frequency may vary depending on the stability of carbon pools and the nature of emission sources. Therefore, the expression: <i>“GHG removals and emissions shall be continuously reviewed and evaluated throughout the implementation period.”</i> should be understood as follows: <i>“The holder shall maintain a continuous monitoring system for information relevant to GHG removals and emissions, with monitoring reports prepared and verified at defined intervals (annual or multiannual, depending on the variable and the source).”</i> This clarification will be included in the final version of the methodology.

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5	Page 74. Section 14.3 Monitoring of carbon stock: “The monitoring of carbon stocks in selected carbon pools shall be carried out annually, since annual stock data are required for the calculation of net removals. According to Table 1 on the normative use of modal verbs, a differentiation is established between ‘may’ (optional), ‘should’ (recommended), and ‘shall’ (mandatory). However, it is not clear whether monitoring shall or should be annual, since the following sentence in the same paragraph provides clarification on the procedure to be followed in case annual monitoring is not performed.”	Section 14.3 Monitoring of carbon stock	Cercarbono clarifies that the intent of the text is to establish annual frequency as a recommended reference, not as a mandatory requirement, provided that the project maintains equivalent, verifiable, and conservative data series. Therefore, monitoring does not have to be physically conducted every year, but there must be transparent and reproducible annual estimates that allow the calculation of the CCMP’s annual net removals. The criterion should be interpreted according to Cercarbono’s normative use of modal verbs: • “Shall”: mandatory, without alternative. • “Should”: recommended, applicable unless technically justified otherwise. • “May”: optional. Therefore, carbon stock monitoring should be carried out annually as a recommended practice but does not constitute a strict obligation, provided that the annual estimates are technically justified, transparent, and verifiable. Cercarbono will adjust the normative verb in the final version of the CM-LU-002.
6	Methodological consistency: the integration of data from different sources must follow a uniform methodological logic. Mixing methodological tiers (Tier 1, 2, and 3) without explicit technical justification is not permitted. It is recommended to include a clarifying note stating that the methodological tiers (Tier 1, 2, and 3) are described by the IPCC.	Section 17.1 Data, model and parameter quality management	Cercarbono confirms that the CM-LU-002 explicitly adopts the methodological tier structure (Tier 1, 2, and 3) defined by the IPCC (2006 and 2019) for all GHG quantification components. The text “<i>mixing methodological tiers without explicit technical justification is not permitted</i>” aims to ensure vertical coherence and methodological traceability—that is, that the data, models, and

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			emission factors used in a CCMP are consistent within the same tier or, in cases where they are combined, that their compatibility is clearly documented and remains conservative.
7	Section 3.1 Scope (page 13) “In all program or project activities of the CCMP (reforestation, forest restoration, woody agricultural crops, and revegetation), both the woody understory and herbaceous vegetation, being composed of elements with low biomass accumulation, high temporal variability, and limited structural permanence, are not eligible for the direct generation of carbon credits, as they are more oriented toward ecosystem stability, soil protection, and the generation of complementary ecological benefits, provided that their implementation is aligned with sustainable practices and does not contradict the objective(s) of the program or project activity(ies). In Table 5 of the methodology, it is mentioned that the woody understory, associated with the above-ground shrub biomass pool (AShrub), may be optionally included in the carbon quantification if it shows significant accumulation. However, in the paragraph on page 13 it is stated that this component is not eligible for the generation of carbon credits, which represents a contradiction within the same document. The statement that this pool is not considered eligible in the methodology also contradicts what is established in Section 6.3 (page 26): “Shrub biomass (aboveground or belowground) is optional in all considered segments, and if included, it must be presented both in the baseline and project scenarios.”	Section 3.1 Scope	Cercarbono clarifies that there is no methodological contradiction between the referenced sections. The difference corresponds to two levels of interpretation: - At the activity or segment level: The woody understory does not constitute an independent eligible activity for generating credits by itself, as it does not define a type of intervention (for example: restoration, reforestation, or revegetation). - At the carbon pool level: The above-ground shrub biomass (AShrub) is indeed an optional eligible carbon pool within the segments approved by the methodology. In accordance with Table 5 and Section 6.3, this carbon pool may be included if it shows significant carbon accumulation and must be treated with methodological symmetry—that is, quantified both in the baseline and project scenarios. Cercarbono’s official response under reference C-084-2025 already expressly recognizes this. Thus, the phrase in the Scope text (page 14) should be interpreted as a clarification that the woody understory does not directly generate credits as an

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	Likewise, a contradiction appears in CERCARBONO's official response in document C-084-2025, in which it was indicated that: "In the FA Methodology version 3.0, it is indeed allowed to consider the above-ground shrub biomass pool (AShrub), which can be quantified both in the baseline and project scenarios." Additionally, although Table 5 allows for the inclusion of this pool if significant accumulation exists, it does not clearly define the threshold or percentage considered "significant" for its incorporation in the Climate Change Mitigation Project (CCMP). Therefore, it is requested that the woody understory pool (Above-Ground Shrub Biomass – AShrub) be included as eligible in the project scenario for the reasons and evidence presented by XXX³ in item 3 of the document submitted on April 8, 2025, "Comments V2.2 Methodology.pdf."		activity, but its carbon may be accounted for as part of the total CCMP balance when it meets the technical criteria of significance, measurement, and verification. Therefore, the wording on page 14 will be adjusted in the final version of the CM-LU-002 Integrated methodology Reforestation, Forest Restoration, Revegetation and Establishment of Woody Agricultural Crops to avoid restrictive interpretations and to clarify that optional carbon pools may be accounted for under technical inclusion criteria.
8	In none of the program or project activities (reforestation, forest restoration, revegetation, or establishment of woody agricultural crops) is the inclusion of livestock components permitted, such as extensive or intensive cattle ranching, direct grazing, or silvopastoral or agrosilvopastoral practices. This restriction applies even when such practices are presented as part of agroforestry or mixed management systems. Silvopastoral and agrosilvopastoral systems integrate tree components that contribute to carbon sequestration in biomass. Moreover, their implementation strengthens sustainable land management. Restricting their inclusion in CCMPs limits agroecological innovation and reduces the possibility of designing	N/A	Cercarbono recognizes the environmental and socioeconomic importance of silvopastoral and agrosilvopastoral systems. However, under the current version of the FA Methodology, livestock components (extensive or intensive cattle ranching, direct grazing, or silvopastoral/agrosilvopastoral systems) are not eligible within program or project activities, due to reasons of accounting traceability, methodological integrity, and sectoral differentiation. The FA Methodology was designed to cover GHG removal activities that are exclusively plant-based, within four categories (Reforestation, Forest Restoration, Revegetation, and Woody Agricultural Crops). These activities share the common feature

³ The reference to the author of the comment is removed for confidentiality reasons.

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	projects adapted to the productive and socio-environmental realities of each region, especially in territories where small and medium-sized producers already incorporate trees into their systems as part of a transition toward sustainable models.		that their primary component is woody or shrub vegetation biomass, and they do not include sources associated with animals or soils managed under livestock activity. As is well known, silvopastoral practices involve the coexistence of carbon pools and livestock-related emissions (methane from enteric fermentation, manure, soil compaction, and disturbance), which introduce sources and methodologies belonging to the Livestock sector—outside the scope of the methodology under consultation. Therefore, the exclusion prevents carbon removals from trees in silvopastoral systems from being accounted for simultaneously under agricultural or livestock programs, or from omitting emissions associated with the animal component. Nevertheless, Cercarbono acknowledges the technical and climatic relevance of these systems and is currently working on the development of a methodology that integrates such livestock production systems, complementary to the methodologies developed by Cercarbono within the Land Use sector.
9	Section 3.1 Scope (page 15) “Limited forest use will only be allowed in forest restoration and/or revegetation activities if the maintenance of the carbon stocks achieved throughout the implementation of the CCMP is guaranteed. This use, in addition to the characteristics defined in its definition (see Terms and Definitions section), shall meet the following conditions: – It shall not exceed an annual or periodic extraction threshold equivalent to 20% of the aboveground living biomass per management cycle.	Section 3.1 Scope	The observation is accepted. Therefore, in the final version of the CM-LU-002, the fixed extraction limits (20%) and rotation restrictions (≥ 10 years) will be removed, adopting a flexible approach based on sustainable forest management and carbon permanence. Limited forest harvesting shall be supported by a Sustainable Forest Management Plan or an equivalent technical instrument that defines the silvicultural practices, extraction intensity, and

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	– It may not include intensive commercial short-rotation practices, understood as harvest cycles shorter than 10 years.” The proposed restriction overlooks the existence of sustainable forest management models that allow for harvesting greater than 20% of aboveground live biomass per management cycle without compromising carbon stocks. Limiting the extraction threshold to a fixed percentage ignores the silvicultural dynamics of forest species in Colombia. Likewise, the general prohibition of commercial rotation practices shorter than 10 years makes it unfeasible to include agroforestry systems, silvopastoral systems, or plantations of fast-growing species, whose shorter rotation periods do not necessarily imply carbon loss. This provision, instead of promoting adaptive and evidence-based management, limits the diversity of silvicultural strategies and discourages projects that could be viable and sustainable in terms of carbon and local economy.		rotation cycles according to the ecological and silvicultural dynamics of local species. It is also clarified that the harvesting intensity must maintain or increase carbon stocks in the long term, allowing for temporary fluctuations associated with harvesting or regeneration, provided that recovery is ensured within the management cycle and that the permanence of the generated sinks is guaranteed. With this modification, the methodology allows the incorporation of sustainable forest management models, agroforestry systems, or fast-growing species, provided that technical evidence and monitoring demonstrate that there are no net carbon losses at the end of the crediting period.
10	A. The document would benefit from a clearer, remote sensing-based definition of the classes “forest” and “non-stable forest.” As currently described, these terms are somewhat ambiguous — for example, “non-stable forest” could include areas with frequent disturbance (such as selective logging) that still qualify as forest. Providing quantitative thresholds — such as annual AGB values (e.g. in t/ha) — could help distinguish these classes more objectively, and move away from general FAO-based definitions.	N/A	A. The definitions of “forest” and “non-stable forest” included in the FA_V3.1 Methodology remain aligned with national regulations and with the operational definitions adopted by the UNFCCC and the IPCC. Furthermore, the new document <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector</i> broadens and strengthens this aspect through the explicit incorporation of quantitative variables derived from remote sensing, such as aboveground biomass (AGB), canopy height,

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	B. The remote sensing section in the Annex could also be updated to reflect more current practices. In particular, clearer guidance on classification accuracy and validation procedures would be useful to ensure consistency and transparency. Finally, we'd suggest avoiding the use of the term "non-forest" to refer to both eligible and non-eligible areas, as this can lead to confusion. A separate label for non-eligible areas would help clarify the distinction.		crown cover, and spectral indices (NDVI, EVI, NBR, among others). In this way, the classification of land cover and the analysis of forest stability are not based on fixed thresholds, but on models calibrated and locally validated with field data and satellite observations. This strategy allows methodological consistency to be maintained across countries, avoiding the imposition of single reference values (for example, t/ha or % of cover), which vary according to ecozone, species, and forest density. B. The document <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector</i> incorporates a comprehensive update on the use of remote sensing. In its Sections 4 and 7, it details: • The types of sensors and recommended spatial/temporal resolutions (optical, radar, LiDAR); • The preprocessing procedures and quality control of satellite data; • The validation of models and classifications through statistical metrics (RMSE, MAE, R², confusion matrix); • The use of cross-validation and uncertainty estimation (bootstrap, ensembles, etc.); and • The requirement for traceability of data sources and algorithms used. Regarding the suggestion: "Finally, we'd suggest avoiding the use of the term 'non-forest' to refer to both eligible and non-eligible areas, as this can lead

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			to confusion. A separate label for non-eligible areas would help clarify the distinction.” The methodology already formally distinguishes between: • “Non-forest” areas: eligible for reforestation, revegetation, or establishment of woody agricultural crops. • “Non-eligible” areas: including stable forests and human settlements, which cannot be intervened. Therefore, the term “non-forest” is not used as a synonym for “non-eligible.”
11	It may be helpful to replace this with something more tangible from a remote sensing perspective — for instance, using AGB expressed in t/ha could provide greater clarity.	Section Terms and definitions	The definition of “forest” included in the methodology remains aligned with the national parameters adopted by each country under the United Nations Framework Convention on Climate Change (UNFCCC). This approach ensures legal coherence and international comparability, given that the definition of “forest” is a regulatory parameter established by each Party to the UNFCCC and cannot be replaced by single technical thresholds (for example, aboveground biomass values expressed in t/ha), which vary widely among ecosystem types and climatic conditions. Nevertheless, the methodology complements this regulatory definition with a technical-operational approach based on remote sensing, through which aboveground biomass (AGB) models, canopy cover, vegetation height, and other spectral indices are used as quantifiable variables for the classification, monitoring, and verification of forest cover.

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			In this way, the definition of “forest” maintains its international legal framework, while AGB indicators and other remote-sensing-derived metrics are used as technical support tools to characterize the condition, stability, and dynamics of the forest over time.
12	Consider rewording for clarity: <i>The land use sector is highly relevant to human survival</i>	Section Introduction	The recommendation is accepted. The wording will be adjusted in the final version to improve the clarity and precision of the message.
13	Consider rewording for clarity: land use has a dual role, not	Section Introduction	The recommendation is accepted; the wording will be adjusted in the final version.
14	Consider rewriting for clarity: <i>land use categories such as forest and agricultural land can play a significant role in mitigation actions</i>	Section Introduction	The recommendation is accepted; the wording will be adjusted in the final version.
15	The concept of dynamic baselines doesn’t appear to be fully developed in the current draft. It could be helpful to include guidance on how to select appropriate counterfactual areas and how to track AGB over time — ideally on an annual basis — in both project and comparison sites: <i>It includes the identification of baseline and project scenarios throughout.</i>	Section 3. Objective and application field	The observation is accepted. In the final version, complementary wording will be incorporated to reinforce the approach of dynamic baselines and the annual or periodic traceability of AGB, explicitly referring to the procedures detailed in the <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector</i> (Section 7.1 or similar after its update).
16	It’s unclear whether a dynamic baseline is being referenced here — it may be helpful to clarify the intention: <i>It includes the reassessment of baseline and project scenarios to dynamically recalculate the total long-term mitigation potential.</i>	Section 3. Objective and application field	The observation is accepted. In the final version, it will be explicitly clarified that the intention is to dynamically recalculate both baseline and project scenarios, strengthening the reference to the concept of a dynamic baseline and the temporal monitoring of mitigation potential in accordance with the complementary technical guidelines.

No.	Comment	Section	Answer
17	It may be useful to clarify that this refers to the “dynamic baseline.”: <i>and the gross annual emissions during the results period compared to the baseline scenario.</i>	Section 3.1 Scope	The recommendation will be taken into account. Although the methodology already addresses the comparison between gross annual emissions during the results period and the baseline scenario, the importance of explicitly clarifying that this comparison is framed within the concept of a “dynamic baseline” is recognized. In the final version, the wording will be adjusted to make explicit reference to the dynamic baseline approach, in coherence with the <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector</i> (Section 7.1), which establish the technical procedures for the periodic updating of the reference scenario and the monitoring of mitigation potential over time.
18	The purpose of this column could be clarified.: <i>Table 1 Included.</i>	Section 3.1 Scope	The observation will be considered to clarify the meaning of the “Included” column, indicating that it represents the inclusion or exclusion of the GHG pool or source in the quantification of the project or program.
19	It may be worth considering whether this is necessary in this context.: <i>Table 1</i> like, for scientific,...	Section 3.1 Scope	The recommendation is accepted. The scientific purpose in the activity of woody agricultural crops will be removed in the final version.

No.	Comment	Section	Answer
20	This is confusing: “non-forest” is mentioned under both eligible areas and non-eligible areas. Probably only correct under “eligible areas”?	Section 4.1 Area eligibility	The observation will be considered in the final version of the document to strengthen terminological consistency (avoiding ambiguities) and ensure that the term “non-forest” is used exclusively in the context of eligible areas.
21	It could be helpful to define this term more clearly in relation to EO-based classifications: <i>This classification represents the minimum recognition criterion for the CCMP total area, supported by the analysis of satellite imagery (using reliable and verifiable data) and other guidelines outlined in the following sections.</i>	Section 4.1 Area eligibility	The observation will be considered. The methodology will clarify the link between classification and Earth Observation (EO), defining its role as a minimum technical criterion supported by verifiable geospatial data and by the guidelines in the following sections.
22	It may be helpful to define this earlier, as it appears to be a key concept: <i>non-stable forest areas</i> .	Section 4.1 Area eligibility	The recommendation will be taken into account. The methodology already includes the definition of the term “non-stable forest” within the section Terms and Definitions, in coherence with national parameters and the UNFCCC guidelines. This term is used to describe areas that do not maintain continuous forest cover for at least ten years due to natural or anthropogenic disturbances but retain their forest function or vocation.
23	You might consider using a different term here to avoid potential confusion: non-forest areas (that were not considered eligible),	Section 4.1 Area eligibility	Observation already considered. The terminological adjustment regarding the use of the term “ non-forest ” will be addressed comprehensively in accordance with the action indicated in the previous response.

No.	Comment	Section	Answer
24	Since this term may be confusing in its current form, it could be worth considering a completely different term for greater clarity: <i>Non-forest</i> .	Section 4.1 Area eligibility	The observation has already been addressed in a previous response, where it was indicated that the terminology used for the term “ <i>non-forest</i> ” will be reviewed to avoid confusion and maintain conceptual consistency between eligible and non-eligible areas. Therefore, the comment is considered covered under the same terminological improvement action previously established.
25	It’s a bit unclear what’s meant here — since GPS alone doesn’t enable forest mapping, perhaps the intended use could be clarified: <i>Global Positioning System (GPS)</i> .	Section 4.1.1.1 Collection and presentation of mapping information	The observation will be addressed through reference to the <i>Guidelines for Mapping Presentation and Analysis</i> , which regulate the use of GPS and other geospatial tools in the processes of collecting and presenting cartographic information.
26	It’s difficult to see how a dynamic baseline could be established using drones over a 100 km radius — this approach may not be practical at that scale and might need reconsideration: <i>The use of images captured by drones to</i>	Section 4.1.1.1 Collection and presentation of mapping information	The observation is considered addressed in the new version of the methodology, which refers to the <i>Guidelines for Mapping Presentation and Analysis</i> , where the technical criteria regarding scale, resolution, and relevance of geographic information sources are established. Within this framework, the use of drone-captured imagery is understood as a complementary tool for field validation and high-resolution surveys in discrete or specific areas of interest, not as a primary source for establishing large-scale dynamic baselines (for example, a 100 km radius). The scale and spatial coverage of monitoring are determined according to technical relevance and the availability of satellite information, as indicated in the cartographic guidelines.

No.	Comment	Section	Answer
27	This appears to address the quality of geographic information but doesn't seem to provide guidance on the quality or accuracy of the resulting maps: <i>The ISO 19157:2023 standard</i> .	Section 4.1.1.1 Collection and presentation of mapping information	As mentioned earlier, the methodology will refer to the <i>Guidelines for Mapping Presentation and Analysis</i> for the practical application of ISO 19157:2023, which establishes the quality, accuracy, and validation requirements for maps derived from the methodological process.
28	It would be helpful to clarify which guidelines are being referenced here: <i>The CCMP mapping presentation must comply with the guidelines established in the Guidelines for Mapping Presentation and Analysis</i> .	Section 4.1.1.1 Collection and presentation of mapping information	Observation addressed. The reference corresponds specifically to the <i>Guidelines for Mapping Presentation and Analysis</i> , which regulate the preparation and validation of the geospatial inputs of the CCMP.
29	It may be more accurate to refer to this as the: "minimum mapping unit (MMU).": <i>minimum mappable area</i> -	Section 4.1.1.1 Collection and presentation of mapping information	The recommendation will be taken into account. In the final version, the terminology will be reviewed to harmonize the term " <i>minimum mappable area</i> " with the standard designation " <i>minimum mapping unit (MMU)</i> ," in accordance with the technical usage adopted in the cartographic guideline and international best practices.
30	The wording here feels somewhat dated — you might consider updating it to reflect more current terminology. Raster Data Raster data must be used with specialized software for image interpretation	Section 4.1.1.1 Collection and presentation of mapping information	The observation will be considered, and the wording in the <i>Guidelines for Mapping Presentation and Analysis</i> regarding raster data will be updated to reflect contemporary terminology and technologies in geospatial analysis.
31	It seems this may be referencing a specific source, though it isn't cited. In any case, since "non-stable forest" areas are considered eligible for restoration, it would make sense to ensure this includes cases where the forest is degraded or disturbed, but still retains forest status. Basing all class definitions on measurable indicators like AGB (in t/ha) could provide useful clarity: <i>non-stable forest</i> .	Section 4.1.2 Identification and classification of areas	The recommendation will be taken into account. The definition of "non-stable forest" will be included in the Terms and Definitions section and complemented in the final version to clarify that it includes degraded or disturbed areas that retain forest status and recovery potential.

No.	Comment	Section	Answer
			The methodology remains consistent with the Guidelines for the Use of Models in Baseline Carbon Quantification, where quantifiable indicators such as aboveground biomass (AGB), canopy cover, and height are established, without setting universal thresholds.
32	The term “transitional tool” could benefit from further clarification, as its intended meaning isn’t entirely clear.: more.: <i>This region serves as a transitional tool to ...</i>	Section 4.1.2 Identification and classification of areas	The recommendation will be taken into account. In the final version, the wording will be reviewed to replace or clarify the term “transitional tool,” specifying its function as a transition zone or category between land covers (for example, between forest areas...).
33	It may be worth considering making the use of EO data a formal requirement to ensure consistency and transparency: <i>it is recommended to quantify activity data...</i>	Section 4.1.2 Identification and classification of areas	The observation is considered addressed. The methodology already establishes the use of verifiable satellite imagery as a mandatory input for the identification and classification of areas, in coherence with the Guidelines for the Use of Models in Baseline Carbon Quantification and the Guidelines for Mapping Presentation and Analysis, which standardize the use of EO (Earth Observation) sources.
34	This source isn’t referenced in the bibliography and doesn’t appear to be identifiable through Google Scholar. It may reflect older or less widely recognized work. Based on the content of Annex 1, there seems to be a strong case for updating this section more substantially to align with current best practices: <i>Galindo et al. (2014)</i> .	Section 4.1.2 Identification and classification of areas	The observation will be considered to update or replace the reference “Galindo et al. (2014),” ensuring consistency with current best practices and scientific sources.
35	The steps outlined here may not be sufficient to ensure reliable classification of forest, non-forest, and “unstable” forest areas. It would be helpful to include a more detailed procedure for assessing the quality of the resulting maps, including validation steps and plausibility	Section Annex 1	The observation will be addressed in the final version of the methodology. However, it is important to mention that the technical content previously included in Annex 1 was removed from the methodology and relocated to the <i>Guidelines for Mapping Presentation and Analysis</i> , a

No.	Comment	Section	Answer
	checks. As currently presented, the approach could lead to sub-optimal results without such safeguards in place.		complementary document that develops in greater detail the aspects related to: - The use of Earth Observation (EO) sources, - The procedures for classification and validation of land cover, - The evaluation of the quality and accuracy of cartographic products, and - The technical criteria for scale, resolution, and accuracy. In this way, the main methodology remains focused on general and conceptual guidelines, while the cartographic guideline assumes the operational and methodological development of remote sensing and mapping processes, ensuring consistency with ISO 19157:2023 and current international best practices.
36	It may be helpful to clarify what is meant by this term: <i>area visualization methods</i> .	Section Annex 1	<i>See answer 35.</i>
37	It might be worth considering an outcome-based approach — for example, if the resulting maps can be shown to meet a defined quality standard, that could be sufficient regardless of the specific method used.	Section Annex 1	<i>See answer 35.</i>

No.	Comment	Section	Answer
28	The approach described here seems somewhat dated — for instance, relying on composites may not fully reflect current best practices in the field:	Section Annex 1	See answer 35.
39	This statement may need clarification, as all the sensors mentioned (e.g., CBERS, RapidEye, ASTER, Sentinel-2) are satellite-based.: <i>When satellite data does not provide sufficient cloud-free coverage, images from sensors such as CBERS, RapidEye, ASTER, Sentinel 2, are used.</i>	Section Annex 1	See answer 35.
40	This section may benefit from further clarification, as the current phrasing is a bit difficult to interpret: <i>Each image is reconstructed by merging all bands, except those corresponding to the thermal infrared wavelength</i>	Section Annex 1	See answer 35.
41	It may be helpful to clarify why a semi-automated approach is preferred here instead of a fully automated one: <i>A semi-automated procedure...</i>	Section Annex 1	See answer 35.
42	Perhaps this is intended to refer to “atmospheric correction”? If so, it might be helpful to clarify: ... <i>geometric distortions, etc...</i> Perhaps this is intended to refer to “atmospheric correction”? If so, it might be helpful to clarify: <i>Radiometric normalization.</i>	Section Annex 1	See answer 35.

No.	Comment	Section	Answer
43	Composites often result in lower classification accuracy and may not be the most reliable option — it might be worth reconsidering their use in this context.: <i>The main metric generated is the annual median for each spectral band, a statistic that has shown good results for change detection.</i>	Section Annex 1	See answer 35.
44	It may be helpful to clarify whether other spectral bands, biophysical indices, or spectral-temporal representations were considered as part of the analysis.: ... <i>(Red, NIR, SWIR-1, and SWIR-2).</i>	Section Annex 1	See answer 35.
45	. This may not add much value in its current form — you might consider revising or omitting it: ... <i>perform visual verification of the changes on the images to minimize potential errors and false detections.</i>	Section Annex 1	See answer 35.
46	The earlier section outlines some standard pre-processing steps, but doesn't provide details on the classification process itself or how subsequent steps build on that foundation. Further clarification could strengthen the overall workflow description.: ... <i>forest surface,</i> ...	Section Annex 1	See answer 35.
47	It would be helpful to clarify the exact criteria used to define “stable forest.” One possible approach could be to base this on annual AGB trajectories, using a coefficient of variation (CV) to distinguish between “stable” and “non-stable” forest areas.: ... <i>1. Stable Forest</i>	Section Annex 1	See answer 35.

No.	Comment	Section	Answer
48	As noted earlier, there's still a need for a clear and quantitative definition of "non-stable forest" to avoid ambiguity.: 2. Non-stable Forest, 3...	Section Annex 1	See answer 35.
49	With an appropriate approach — such as representation learning — it should be possible to minimize or avoid data gaps altogether.: ... and 4. No Information (corresponding to masked data due to clouds and cloud shadows).	Section Annex 1	See answer 35.
50	The meaning here isn't entirely clear — could you clarify what is intended?: <i>This process considers information from the most recent reporting period to retrospectively adjust areas without information for other reporting periods.</i>	Section Annex 1	See answer 35.
51	Since this approach may not be easily reproducible, it might be worth considering alternative methods that offer greater transparency and consistency.: B. Visual verification	Section Annex 1	See answer 35.
52	The four categories described here seem to represent classification outputs rather than an actual "change map" — it may be clearer to refer to them simply as classes.: ...changes map...	Section Annex 1	See answer 35.

No.	Comment	Section	Answer
53	Additional details would be helpful to make this approach operational. It's also unclear whether the assessment applies to the individual annual forest maps or to the derived multi-annual change maps. For evaluating change, the statistical measures mentioned may not be the most suitable — alternative methods might be more appropriate in this context.: 3. <i>Thematic accuracy</i>	Section Annex 1	<i>See answer 35.</i>
54	Forest definition alignment CM-LU-002 Version 3.0 explicitly defines forest as: "Land area covered permanently by trees, compliant with each country's established parameters under the United Nations Framework Convention on Climate Change (UNFCCC) for area, tree cover, and minimum adult tree height." This allows alignment with New Zealand's ETS definition (1 ha, 30% canopy, 5 m height), confirming CM-LU-002 is adaptable to NZ's regulatory context.	Section Terms and definitions	Yes. Cercarbono's FA v3.0 Methodology adopts the same principle of flexible alignment with the national definitions of forest recognized under the UNFCCC, ensuring coherence with each country's official reference frameworks and its National GHG Inventory or FREL/NREF (where applicable). Therefore, in contexts such as New Zealand, where thresholds of 1 ha, 30% canopy cover, and 5 m height are adopted, FA projects are fully compatible and eligible under that definition. This guarantees that the methodology is applicable and consistent with diverse national regulatory frameworks, such as New Zealand's ETS or the forest standards of other countries with their own UNFCCC-approved definitions.
55	Treatment of grasslands and tussock vegetation Our review of the proposed methodology concluded: • Grassland and tussock vegetation would fall under "non-forest" areas. • Activities such as revegetation and establishment of woody agricultural crops in non-forest areas that do not necessarily reach national forest definition but, they can contribute to GHG removals and ecosystem restoration.	Section 4.1 Area eligibility	The interpretation is correct and is fully aligned with the methodological design of our methodology. It distinguishes three main types of land cover when defining area eligibility: - Non-stable or degraded forest areas, eligible for Forest Restoration (FR). - Non-forest areas (grasslands, shrublands, tussock or degraded vegetation), eligible for Revegetation (RV).

No.	Comment	Section	Answer
	It acknowledges successional pathways by allowing revegetation that may evolve into forests, provided activities follow monitoring and quantification guidelines.		- Non-forest agricultural areas, eligible for Woody Agricultural Crops (WAC). Therefore: - Grasslands and tussock vegetation are methodologically classified as non-forest unless they meet the minimum thresholds of canopy cover, height, and area defined by the national authority under the UNFCCC. - These areas may be subject to revegetation or establishment of woody crop activities, which contribute to net carbon removals and the ecological recovery of degraded ecosystems. - The methodology acknowledges the possibility of ecological succession toward tree or forest formations, without this implying a change in the initial eligibility condition, provided that compliance with the established monitoring and quantification procedures (Section 14) is maintained.
56	Soil Organic Carbon (SOC) • SOC is considered an optional carbon pool across all project activities. It can be included if time-series data or robust comparison datasets are available and if real improvements are expected. •XXX⁴s proposed soil sampling plan (refer to Section 1.5) would align with this clause if sampling protocols and justification are documented in the PDD and Monitoring Reporting and Verification (MRV) reporting.	Section 6.3 Carbon pools	Soil Organic Carbon (SOC) is recognized as an optional carbon pool within project activities, whose inclusion will depend on the availability and robustness of the data. In this regard: SOC may be incorporated into carbon quantification only if reliable time series or solid comparative datasets exist, and when a real improvement attributable to the project activities is expected, taking into account that Tiers 1 to 3 may be used in the baseline scenario and Tiers 2 or 3 in the project scenario, based on direct field measurements.

⁴ Se elimina la referencia del autor del comentario por temas de confidencialidad.

No.	Comment	Section	Answer
			- The proposed soil sampling plan would be compatible with this provision, provided that the sampling protocols, frequency, depth, and methodological justification are clearly documented both in the Project Design Document (PDD) and in the Monitoring, Validation, and Verification Reports, as applicable. In other words, the inclusion of SOC must be supported by a technically robust sampling design that ensures traceability, representativeness, and consistency with IPCC guidelines and the applicable methodology.
57	Aerial seeding and MRV alignment • The methodology allows for a wide range of intervention techniques, including planting, seeding, and promotion of natural seed sources. • Aerial seeding, provided it meets project design, monitoring, and carbon quantification standards, fits within both Reforestation and Revegetation activities.		Cercarbono confirms the methodological validity of aerial seeding as an admissible technique within reforestation and revegetation activities under the FA Methodology, provided that the established design, traceability, and MRV (Monitoring, Reporting, and Verification) criteria are met. The FA v3.0 Methodology establishes that CCMP activities may include different methods of vegetation establishment or regeneration, including: - Direct planting of woody species. - Sowing (manual or mechanized) of seeds or seedlings. - Promotion of natural regeneration through control of limiting factors or ecological assistance. In this context, aerial seeding is considered a valid sowing modality, applicable both to reforestation (when the expected density and composition meet the national forest parameters) and to revegetation

No.	Comment	Section	Answer
			(when the resulting cover does not yet reach those parameters but contributes to restoration and GHG removals). Accordingly, the project holder or developer must include in the Project Design Document (PDD) the dispersion protocols, species used, planned density, target areas, and mechanisms for germination and establishment control. In addition, it must be demonstrated that the seeded species meet the ecological and functional criteria established in the methodology (native, approved or functionally compatible, non-invasive, and with measurable carbon sequestration potential). The Monitoring Plan (Section 14) must also include a description of the methods used to verify establishment and survival, through remote sensing techniques, field sampling, or indirect estimation methods approved by the VVB.
58	Monitoring requirements • CM-LU-002 V3.0 specifies detailed monitoring requirements under Section 14, covering: ◦ Carbon stock monitoring. ◦ GHG emissions from fertilisers, fossil fuel use, fires. ◦ Boundaries and project activities. • Our proposed MRV activities (refer to Appendix A) for aerial seeding (refer to Section 1.4) would integrate cleanly within this structure.	Section 14. Monitoring procedure	The FA Methodology maintains an integrated and modular monitoring structure, fully applicable to CCMPs that use aerial seeding or similar intervention techniques. In its Section 14, “Monitoring Procedure,” it explicitly includes: - Monitoring of carbon stocks in the carbon pools. - Monitoring of associated emissions. - Spatial and boundary monitoring: control of project boundaries, subareas, and excluded areas.

No.	Comment	Section	Answer
			- Monitoring of implemented activities, follow-up of interventions, sowing density, survival rates, and maintenance of vegetative cover. Therefore, aerial seeding activities, as long as data sources, frequency, and verification methods are documented, are fully integrated within the existing MRV framework of the FA Methodology. The FA Methodology already recognizes in Section 3 of version 3.0 the diversity of establishment techniques, and its MRV structure allows adaptation to different methods of vegetation regeneration or restoration. In addition, the methodology allows the use of remote sensing, multispectral imagery, and other remote sensors to verify the effectiveness of sowing and vegetative cover, provided that these data are auditable by the VVB and supported by field evidence or cross-validation (QA/QC). Meanwhile, Section 9, “Grouped Projects,” of the FA Methodology clearly defines the mechanisms for inclusion, monitoring, and exclusion of areas and participants, ensuring traceability and accounting consistency across periods. Therefore, the grouped approach of FA v3.0 facilitates the replicability and scalability of multi-site or multi-owner projects, as occurs in national contexts with high rural land fragmentation (for example, New Zealand, Colombia, or others), while maintaining data traceability and compatibility with the MRV structure.

No.	Comment	Section	Answer
			Clarifications supporting the above response will be incorporated into the final version of the methodology.
59	Grouped projects • The methodology supports grouped project structures with clear rules on inclusion and exclusion of areas. • This method is useful for scaling across multiple landowners or sites in NZ.		Cercarbono confirms that the FA Methodology fully supports the structure of grouped projects, as established in Section 9, which regulates the procedures for the incorporation, monitoring, and exclusion of areas and participants within a single Climate Change Mitigation Program or Project (CCMP). The grouped project framework allows for the progressive inclusion of new plots or management units under a common structure of design, methodology, monitoring, and verification, while maintaining the environmental integrity, accounting traceability, and technical coherence of the entire program. This approach is highly applicable in countries where fragmented land tenure and diverse land uses make a grouped methodological framework advisable.
60	Inclusion of grasslands and tussock vegetation XXX ⁵ supports the recognition of grasslands and tussock grasslands as part of a scientifically valid and measurable pathway toward revegetation, forest restoration and reforestation. Our supporting rationale for this statement is provided in Section 1.3.	Section 4.1 Area eligibility	Cercarbono fully agrees with this statement and confirms that the FA Methodology recognizes grasslands, shrublands, and <i>tussock</i> vegetation as non-forest areas eligible for the implementation of revegetation or forest restoration activities, according to their ecological and functional potential to promote the recovery of woody vegetation and carbon accumulation.

⁵ Se elimina la referencia del autor del comentario por temas de confidencialidad.

No.	Comment	Section	Answer
61	Compliance with national and international forest definitions Several national and international forestry frameworks acknowledge progressive land-use transformation, beginning with early-stage vegetation such as herbaceous cover and shrub-dominated landscapes, before achieving full canopy closure. IPCC Guidelines for National Greenhouse Gas Inventories classify such land transitions as part of carbon accounting under land-use change dynamics. Allowing grasslands and tussock species within the CM-LU-002 framework would improve the methodology's alignment with recognised global climate change mitigation strategies.		The FA Methodology complies with the national and international definitions of forest recognized by the UNFCCC and incorporates land-use transitions in accordance with the IPCC 2006/2019 Guidelines. It recognizes that revegetation or forest restoration activities may begin in non-forest areas—including grasslands, shrublands, or bush formations—which represent early stages in the successional process toward forested or woody cover, by integrating the principle of land-use transition as defined by IPCC categories: - Grasslands to Forest Land - Grasslands to Revegetated Land - Cropland to Forest Land / Revegetated Land In addition, it requires maintaining methodological symmetry between baseline and project scenarios, quantifying carbon stocks and net removals throughout the entire conversion process, including early stages where tree cover has not yet reached the national forest definition. In this way, the FA Methodology complies with the IPCC and UNFCCC guidelines, which recognize gradual land-use transitions as valid components of carbon accounting. Therefore, grasslands, shrublands, and <i>tussock</i> vegetation are considered eligible early-stage phases within successional trajectories of revegetation or restoration, provided that they generate verifiable net removals.

No.	Comment	Section	Answer
			Clarifications supporting the above response will be incorporated into the final version of the methodology.
62	Conclusion and request for consideration We strongly believe that recognising and including grasslands and tussock species, particularly in cool temperate project instances, within CM-LU-002 will: • Enhance the methodology's alignment with ecological restoration principles. • Improve the accuracy of carbon sequestration accounting. • Ensure consistency with international best practices in the voluntary carbon market. Expected outcomes are: 1. Increased forest cover from grassland/tussock baseline within a scientifically credible permanence framework. 2. Transparent and repeatable carbon accounting, supporting both climate change mitigation and biodiversity co-benefits. We respectfully request Cercarbono to: a. Consider XXX⁶'s public consultation methodology response and engage in discussions on possible methodological refinements. b. Engage XXX as a technical partner in further dialogue or working group discussions on incorporating natural succession pathways, grasslands, and aerial seeding MRV into the methodology.	N/A	Cercarbono appreciates and values the proposal submitted, which aligns with the technical criteria already developed and addressed in previous responses regarding: - The eligibility of grasslands and tussock vegetation as non-forest areas in revegetation or restoration processes; - The recognized scientific validity of successional trajectories that may lead to forest formations; and - The inclusion of aerial seeding as a technique compatible with the MRV framework of the FA Methodology. In this regard, Cercarbono fully shares the general orientation of the proposal, as it strengthens methodological coherence with the IPCC Guidelines (2006 and 2019) and with international best practices in ecological restoration and carbon accounting. Cercarbono remains open to continuing technical dialogue and exploring opportunities for joint work toward the development of future methodological improvements. Such collaboration may take place through technical roundtables, working groups, or methodological review processes, provided that technical independence and the absence of conflicts of interest (COI) are ensured, in compliance with

⁶ The reference to the author of the comment is removed for confidentiality reasons.

No.	Comment	Section	Answer
			Cercarbono's Governance and Transparency Protocol.