

Response to Public Consultation Comments on Methodology CM-LU-CW-001 Blue Carbon Methodology for Mitigation of Climate Change in Coastal Wetlands

**Version
1.0**

Response to Public Consultation Comments on Methodology CM-LU-CW-001

Dear Participants,

Cercarbono expresses its sincere gratitude for your participation in the public consultation on the **CM-LU-CW-001 Blue Carbon for Climate Change Mitigation in Coastal Wetlands Methodology**, conducted online from November 28, 2025 to January 23, 2026.

Your valuable comments strengthen the technical robustness of the methodology. They support the consolidation of a more comprehensive and consistent framework, enabling project proponents and developers to implement restoration and revegetation initiatives in mangroves, tidal marshes, and seagrass meadows. Ultimately, this facilitates their participation in Cercarbono's Voluntary Carbon Certification Programme.

The attached table presents a compilation of the comments received, along with the corresponding clarifications and responses jointly developed by the TABAH team and Cercarbono's technical department. This document will remain publicly available on our website under the "Consultations" section.

Thank you once again for the time dedicated to this review and for your valuable contribution to our continuous improvement process.

Sincerely,



Alex Saer
Cercarbono's CEO

No.	Comment	Document section	Answer
1	I can't download the document.	NA	Thank you for your interest. The CM-LU-CW-001 methodology document was available at https://registry.cercarbono.com/39 during the relevant public consultation period. In this case, a communication was issued, upon receipt of your comment, to address the reported situation and ensure timely access to the documentation.
2	Application for carbon credits to implement our project. Original language: Demande de crédit carbone pour mettre en œuvre de notre projet.	Section 3 Objective and application field; Section 4 Eligibility and Inclusion Requirements.	Thank you for your interest. We want to clarify, Carbon credits under Cercarbono's Voluntary Carbon Certification Programme are only issued ex post, based on verified GHG mitigation outcomes, resulting from already implemented project activities.. The methodology provides the technical framework for quantifying mitigation outcomes of Climate Change Mitigation Programmes or Projects (CCMPs), focused on the restoration or revegetation of coastal wetlands (mangroves, tidal marshes, and seagrass meadows). To develop a CCMP, proponents must comply with eligibility requirements, including: -Area eligibility. -Demonstrated legal ownership or management rights. -Compatibility with applicable land-use planning and environmental regulations. Quantification shall be aligned with IPCC Wetlands guidance, and the CCMP must undergo validation and verification by an accredited body in accordance with the Protocol of Cercarbono's Voluntary Carbon Certification Programme.
3	What are the guidelines for defining the delineation of the coastal boundary in a project of this type? • What tools are used to measure mean sea level (MSL)? • On page 28 of the document, it is stated that a CCMP must have a maximum	Section 6.2 CCMP Spatial boundaries;	Thank you for your comments. Please find responses to each point below: 1. Coastal boundary delineation

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	interval of three years between successive verifications. What happens in cases where this interval is exceeded? Original language: ¿Cuáles son los lineamientos para realizar la delimitación de los límites de la línea costera en un proyecto de este tipo? • ¿Cuáles son las herramientas para de medir el nivel medio del mar (MSL)? • En la página 28 del documento se indica que un CCMP debe tener un intervalo máximo de tres años entre verificaciones sucesivas. ¿Qué ocurre en el caso en el que se supere dicho intervalo?	Section 6.3.1 Collection and Presentation of Mapping information. Section 6.1 CCMP temporal boundaries.	Section 6.2 requires all CCMP's spatial boundaries to be georeferenced and submitted in shapefile (.shp) format. In the same sense, reference is made to Cercarbono's <i>"Guidelines for Mapping Presentation and Analysis,"</i> which provides detailed guidelines for the presentation of spatial boundaries. In addition, Section 6.3.1 specifies the required cartographic layers, including: - Coastline boundaries updated with the most recent official data available. - Relevant hydrological and geomorphological features. - Information on historical degradation drivers. The methodology is consistent with IPCC's Wetlands Supplement (2014), which requires spatial delineation of wetland categories based on vegetation type, flood regime, and geomorphic setting. 2. Tools for measuring Mean Sea Level (MSL) The methodology does not prescribe specific instrumentation for MSL determination, as appropriate methods are dependent on site context. Recognised technical approaches to obtain related data include: - National tidal gauge networks. - Satellite altimetry (e.g., Copernicus Marine Service). - Local hydrographic surveys. - Official geoid models and national vertical datum. For project-level delineation, the use of Real-Time Kinematic (RTK) GPS referenced to the national vertical datum is considered standard practice in blue carbon site characterisation.

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			The proponent shall use the most reliable, locally relevant, data source and document the vertical datum, reference system, and accuracy level in the PDD. 3. Maximum three-year verification interval The methodologies must be consistent with Cercarbono's regulatory framework documentation. Please refer to Section 9.4.1 of Cercarbono's Protocol for Voluntary Carbon Certification, V4.5, available at: www.cercarbono.com, section "Documentnation". In such document, it is indicated a CCMP shall maintain a maximum interval of three (3) years between successive verifications, unless it is its first verification, which can be performed up to five (5) years after the project start date. If this interval is exceeded, the project may request (duly justified), a 6-month grace period, additional to previous compliance periods, within which a verification event shall be performed. Otherwise, the project will be considered as "Abandoned", and corresponding procedures as per Cercarbono's regulatory framework are to be initiated. This requirement safeguards MRV integrity and ensures continuous accountability of mitigation outcomes.
4	Few comments for your consideration as follows: 1. (Bullet 2, Roman iii, Para 4, Page 18) - Include reference to relevant treaties (e.g., Ramsar) as an acknowledgment to promote policy alignment with ratified countries and encourage stakeholder buy-in for the project or investment. 2. (Bullet 2, Para 3, Page 19 & Bullet 1, Para 2, Page 20 - It is recommended to review the 2019 IPCC Refinement document to determine whether it includes any significant updates related to wetlands. 3. (Bullet 2,	Section 3.1 Scope; Section 3.3 Technical and Program Compliance; Section 4.2 Area eligibility; Section 6.2 CCMP Spatial Boundaries;	Thank you for your feedback. Please find responses to each point below: 1. Reference to relevant treaties (e.g., Ramsar) (p.18) We take note of the recommendation. The methodology already recognizes applicable international frameworks for wetland conservation.

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	Page 22) -It is recommended to include land reclamation activities, as they may have significant implications for seagrass ecosystems. 4. (Para 6, Page 25 & foot notes, page 25) - It is recommended to include land reclamation activities, as they may have significant implications for seagrass ecosystems. 5. (Point b, Page 26) - It is recommended to provide examples of existing data sources to help proponents generate ideas (without limiting them). For instance, ocean mapping data can be used as a reference. wealth: https://maps.oceanwealth.org/#/bluecarbon 6. (Para 7, Page 68) - Are there no permanent monitoring plots for the seagrass segment, as there are for mangroves and tidal marshes?	Section 6.3.1 Collection and Presentation of Mapping Information; Section 8.1 Carbon Stock Estimation.	However, convenience of including more explicit reference to relevant treaties, such as the Ramsar Convention, in order to reinforce alignment with international commitments and promote public policy coherence in ratifying countries, will be evaluated. 2. IPCC 2019 Refinement (p.19–20) The methodology is based on the 2013Supplement to the 2006 IPCC on Wetlands, which retains primacy for accounting in coastal wetlands. The 2019 Refinement has also been reviewed in the course of this methodology's development. Nevertheless, the final version of the methodology will explicitly state that future IPCC updates, refinements, or new guidance shall be considered as applicable. 3-4. Coastal infilling or artificial land gain (land reclamation) in seagrass meadows (p.22 and p.25) Coastal infilling or artificial land gain (land reclamation) activities are implicitly addressed within the analysis of agents and causes of wetland loss or degradation (Section 4.1.1), which requires identification of biophysical, anthropogenic, and structural pressures affecting coastal ecosystems. These activities, which involve the conversion of marine or intertidal areas into terrestrial land through infilling, dredging, or infrastructure development, have been widely documented as major drivers of global seagrass meadow loss. It is important to clarify that the methodology does not consider or promote the transformation of natural ecosystems or the conversion of marine areas into terrestrial land. Conversely, its objective is to restore the ecological and functional integrity of degraded

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			coastal ecosystems, maintaining their original nature and dynamics. To enhance technical clarity, the revised version will incorporate an explicit reference to coastal infilling or artificial land gain as a specific example of a degradation driver within the seagrass segment. 5. Examples of data sources (p.26) The methodology establishes mandatory cartographic layer requirements and data quality criteria without restricting the use of specific sources. In line with the <i>Guidelines for using Models in Baseline Carbon Quantification in the Land Use Sector</i> (V1.1), priority is given to nationally or subnationally validated official data sources, provided they meet criteria of representativeness, traceability, temporal validity, and methodological consistency. To facilitate implementation, the revised version may include an illustrative and non-exhaustive reference to publicly accessible geospatial information platforms (e.g., global coastal monitoring or ocean observation initiatives), while maintaining the non-prescriptive nature of the methodological framework and without replacing the priority given to national sources where available. 6. Permanent monitoring plots for seagrass (p.68) Section 8.1 establishes that estimation of changes in aboveground herbaceous biomass in seagrass meadows must be based on field measurements applied consistently across monitoring periods (quadrats, destructive or non-destructive methods). Section 15 applies to all ecosystem types. The methodology does not require permanent monitoring plots for seagrass. However, where site

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			conditions allow so, the use of permanent or semi-permanent monitoring stations is recommended to improve temporal comparability and reduce uncertainty. In highly dynamic systems, alternative sampling designs may be used, provided they are statistically robust and duly justified. Monitoring intervals shall be aligned with the verification cycles established under the Cercarbono Carbon Programme.
5	What should be the sample count? This is the most critical statistical issue for the credibility of the credits. The methodology does not establish a ‘magic number’, but rather sets out principles: General Principles of the Methodology: Statistical representativeness: (Section 6.5.1) Requires ‘a statistically representative number of samples to determine... the carbon content in all affected reservoirs.’ Stratification: (Sections 6.2, 7.1.1) Samples must be distributed across homogeneous strata within the project. However, for a robust standard, recommendations should clearly specify the number of samples or the sampling scheme. As currently written, the technician will choose what is feasible, which is not always precise. Original language: Qual Deve Ser o Número de Amostras? Esta é a questão estatística mais crítica para a credibilidade dos créditos. A metodologia não fixa um número mágico, mas estabelece princípios: Princípios Gerais da Metodologia: Representatividade Estatística: (Seção 6.5.1) Exige "um número estatisticamente representativo de amostras para determinar... o conteúdo de carbono em todos os reservatórios afetados".	Section 6.5.1 Emission Factors); Section 6.2 CCMP Spatial boundaries; Section 7.1.1 Stratification criteria; Section 12 Uncertainty Assessment and Management; Annex 2.	Thank you for your comments. Regarding sample size (sample count), the methodology follows a principle-based approach, therefore not prescribing a fixed minimum number of samples, as appropriate sample size depends on ecosystem type, spatial heterogeneity, project area, and the carbon pools assessed, in turn responding to the data universe size, value dispersion, design of sampling system (e.g., random or stratified), allowable confidence level and margin of error, thus the sample size is a result of an initial analysis, and not a fixed base parameter. This approach is consistent with the IPCC Wetlands Supplement (2014), which requires sampling designs to ensure statistical representativeness, uncertainty control, and methodological transparency, without prescribing universal sample sizes. However, sample size is not discretionary. The methodology explicitly requires: - Statistically representative sampling (Section 6.5.1); - Stratification to reduce within-stratum variability (Sections 6.2 and 7.1.1); - Explicit uncertainty quantification and reporting (Section 12);

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	Estratificação: (Seções 6.2, 7.1.1) As amostras devem ser distribuídas por estratos homogêneos dentro do projeto: MAS, Recomendações para uma Norma Robusta. Deve deixar claro o numero de amostras ou esquema amostral. Da forma que está o técnico escolherá ao que for viável, nem sempre preciso.)		- Assessment of the sampling design by the VVB during validation and verification. In response to this request for clarification, the revised version will incorporate additional statistical guidance for determining stratum-specific sample size, requiring proponents to document the variability considered, the target precision, and the confidence level achieved, thereby strengthening transparency, methodological consistency, and statistical robustness.
6	What should be the number of samples? This is the most critical statistical issue for the credibility of the credits. The methodology does not establish a ‘magic number’, but rather sets out principles: General Principles of the Methodology: Statistical representativeness: (Section 6.5.1) Requires ‘a statistically representative number of samples to determine... the carbon content in all affected reservoirs.’ Stratification: (Sections 6.2, 7.1.1) Samples must be distributed across homogeneous strata within the project. However, for a robust standard, recommendations should clearly specify the number of samples or the sampling design. As currently written, the technician will choose what is feasible, which is not always precise. What is the georeferencing accuracy of the sampling locations? What is the accuracy of the equipment? What equipment is used and what are their typical accuracies? What level of accuracy is required? For soil carbon projects, especially in ecosystems such as mangroves with high heterogeneity, is the required accuracy centimetric to decimetric rather than metric?	Section 6.5.1 Emission Factors; Section 6.3.1 Collection and Presentation of Mapping information; Section 12 Uncertainty Assessment; Annex 2.	The first part of this comment has been addressed in response to previous comment, marked as “5”. Complementing what has been indicated regarding sample size, , subjects related to spatial accuracy and technical specifications applicable to monitoring are discussed below. Georeferencing Accuracy The delineation of the project area and associated spatial information shall comply with the applicable cartographic requirements of the Cercarbono Voluntary Carbon Certification Programme, including those established in the <i>Guidelines for Mapping Presentation and Analysis</i>. - For sampling points and monitoring plots, the required level of positional accuracy shall depend on the purpose of the survey and the degree of ecosystem heterogeneity; - For general area delineation, positional accuracy shall be consistent with the cartographic scale used and the level of spatial analysis required. - For relocatable permanent monitoring plots, accuracy shall be sufficient to ensure consistent

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			Uncertainty associated with each parameter shall be quantified, propagated, and reported in accordance with Section 12. During validation and verification, the VVB shall assess whether georeferencing and equipment precision are appropriate for the ecosystem heterogeneity level, the risk of material error, and the conservativeness principle applied in quantification. The required precision level is not arbitrary; it shall be proportional to the spatial variability of the ecosystem and the risk of significant impact on carbon estimation.
7	I had very limited window of time to evaluate this method. Some observations from a brief read are that it is likely very expensive to implement with a wide range of on-ground and laboratory measurements required. This will prohibit community access to this method, because levels of technical skill needed will be high and thus communities will have to partner with technical organisations which results in benefit sharing arrangements that can add to the cost of projects for communities and can often be unfair. Consider adding a decision tree and options that can guide through less technically intense approaches vs. more intense. Consider providing figures/illustrations showing the overall method architecture, linked to text. In general there was a tendency for having to read further to find out what exactly involved when a concept was first raised. The document is very long and there is repetition. Consider arranging sections to avoid repetition. 1. Some coastal wetland habitats are not included- high intertidal salt flats or sabhka are not included 2. Stable forested coastal wetlands are not eligible, but stable tidal marsh is not considered or excluded. This implies that tidal marshes are considered degraded or transitional? This could lead to perverse outcomes of projects. Tidal marshes must be allowed to remain	Section 3.1 Scope; Section 4.1 Preliminary Analysis; Section 4.2 Area eligibility; Section 4.3 Ownership; Section 6.2 CCMP Spatial boundaries; Section 6.4 Carbon pools; Section 6.4.1 Removal Factors; Section 6.4.2 Specific considerations for the Soil Organic Carbon (SOC) pool; Section 7.2.1.1 Specific considerations for the soil organic carbon (SOC); Section 8.1.2 Site Typologies and Restoration Strategies;	Thank you for undertaken review. Please find responses to each point below. It is important to clarify that this document is a GHG baseline and monitoring methodology, not a “method,” and it is designed to ensure environmental integrity, IPCC alignment, and proportionality in projects implemented using it. Technical complexity and community access (not numbered) The methodology establishes requirements proportional to the risk of material error in carbon quantification. It does not impose a single mandatory approach. Certain components (e.g., radiometric dating or detailed soil carbon quantification) may entail higher costs. Therefore: - Alternative technically justified approaches are allowed. - IPCC-consistent tiered approaches may be applied where higher-tier data are not feasible.

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	tidal marshes. 3. Forest wetland = forested wetland - change throughout. 4. define "comparable ecological contexts" 5. The need for radiometric dating will exclude many projects due to cost. Suggest alternative methods - e.g. Rod Surface Elevation Tables - based on literature from similar sites, or conservatively set to zero? 6. Correctly establishing allochthonous soil carbon contributions in the baseline and project scenarios is very difficult and currently almost impossible to do well because proxies and models are not well developed. 7. Why only degraded pastures considered in baseline, why not also degraded aquaculture ponds (need the IPCC 2019 refinement- or other relevant IPCC guidance, considering CDR report is commissioned), degraded cropping land etc... Perhaps include all degraded land at elevations suitable to support coastal wetland vegetation. 8. Measuring soil carbon change can be very difficult if stocks in baseline and reference are variable, which can occur naturally. It is likely that the cost of trying to achieve measurements of change in soils carbon is not worth the "gain" in terms of soil carbon contributions to credits. Provide options for projects to not consider soil carbon (exclude because of the cost or technical capacity constraints, or options to model it). The "alternative approach" is mentioned, but limited instructions. 9. Invasive species are a threat that is not included in Annex or in the main document. 10. there is no guidance on how to calculate the Allochthonous carbon deduction - on what basis is it calculated, ie some proportion of mineral fraction - what proportion? 11. "Verification of legal tenure, management rights, or formal agreements" - This does not capture informal agreements. Consider using terms like "all rights holders" to prevent things like "elite capture".	Section 11 Risk Assessment and Non-Permanence Management ; Section 14 Safeguards; Annex 1; Annex 2.	- Additional non-prescriptive guidance (e.g., decision trees or pathway diagrams) will be incorporated to help proponents distinguish lower- and higher-intensity approaches based on available capacity and data. Community participation is not excluded. However, minimum levels of technical rigor are necessary to ensure environmental integrity and credibility of issued credits. 1. Inclusion of additional habitats (salt flats / sabkha) The current scope prioritizes mangroves, tidal marshes, and seagrass meadows due to strong scientific backing in the IPCC Wetlands Supplement. Future potential inclusion of additional coastal wetland types may be assessed where sufficient peer-reviewed scientific basis exists for emission and accumulation factors. This does not represent a scope restriction, but alignment with currently available international guidance. 2. Eligibility of stable tidal marsh Stable forested coastal wetlands are excluded to avoid overlap with forest-sector methodologies and to maintain additionality integrity and avoid overlap with REDD+ methodology. Stable tidal marshes are not considered degraded by definition. Remaining as tidal marsh is fully compatible with the methodology. Eligibility depends on demonstrating additionality (restoration, revegetation, or functional recovery), not on ecosystem type.

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			The methodology does not incentivize conversion or unnecessary intervention in healthy ecosystems. Clarifying language will be incorporated to prevent misinterpretations. 3. Terminology consistency Terminology (e.g., “forested wetland”) will be harmonized throughout the document to improve clarity and consistency. 5. “Comparable ecological contexts” Refers to ecosystems sharing similar biophysical, climatic, and geomorphological characteristics that allow scientifically justified comparison of emission factors or accumulation rates. A clearer definition will be incorporated for precision. 5. Radiometric dating Radiometric dating is not mandatory in all cases. It is required only where necessary to reduce material uncertainty in sediment accumulation rates. Additional clarification will be provided regarding acceptable alternative approaches, provided they are technically justified and applied conservatively. This does not modify the methodological structure but clarifies existing flexibility. 8. Allochthonous carbon The methodological complexity is acknowledged. The methodology requires consistency between baseline and project scenarios, in accordance with IPCC’s Baseline Guidelines and principles. Guidance on conservative assumptions and documentation thereof, will be reinforced.

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			7. Other degraded land uses The methodology does not conceptually restrict to degraded grassland. Areas degraded from other prior land uses may be eligible, provided they meet ecological suitability and additionality requirements consistent with IPCC guidance. Clarifying language will be included to avoid misinterpretation. 8. Soil carbon change Alternative approaches and modeling are permitted where technically justified. Soil carbon inclusion is not mandatory if: - Technical limitations are demonstrated, - A conservative approach is adopted, - Consistency between baseline and project scenarios is maintained. 9. Invasive species Explicit reference to invasive species as degradation drivers will be incorporated within the risk and monitoring framework to improve completeness. 10. Allochthonous carbon deduction Methodological guidance will be strengthened to improve transparency and consistency in deduction calculations, without introducing new requirements beyond the existing framework. 11. Rights holders The relevant wording will be reviewed to assess its clarity and consistency with applicable safeguards principles.

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8	The methodology is ambitious in its coverage of multiple coastal ecosystems. We would like to see a greater emphasis on empirical data for emission factors, rather than giving equal opportunity to use default values. We recognise that "For significant carbon pools, emission factors shall be derived from field-based inventories of mangroves, tidal marshes, and seagrass meadows"; this would benefit from definition of what constitutes a significant pool. Sites may be considered for active revegetation if no natural colonisation has occurred in 10 years. However a multitude of reasons may be behind a lack of natural recolonisation; e.g., fishing may impact the ability of a seagrass meadow to recolonise an area, in which case management of the fishery, and restoration, may be more appropriate than revegetation. Sediment depth: Assumptions about total relevant depth of sediment are critical in assessing carbon stocks. IPCC defaults are for 1m but most people do not actually core to this depth, because it is difficult and expensive and because this is often not appropriate at particular sites (for example when you hit sediment that is clearly of different origin). A better approach to determine the appropriate depth should be unique to each site but doing so requires some experience and scientific knowledge and there is no consensus on exactly how depth should be determined. The down core comparison method (looking at cores from a seagrass and comparator site and seeing at what depth carbon concentrations converge) , although this requires scientific training and capacity as well as access to appropriate comparator sites. The methodology would benefit from increased robustness in when and why some items and methods are optional and what thresholds/conditions mandate their inclusion, as well as what constitutes "significant" in some places.	Section 6.4 Carbon pools; Section 6.4.1 Removal Factors; Section 6.5.1 Emission Factors; Section 7.2.1 Carbon stock estimation; Section 7.2.1.1 SOC consideration; Section 12 Uncertainty Assessment.	Thank you for your comments. Please find responses to each point below: It is worth recalling, this document is a GHG baseline and monitoring methodology, designed to ensure environmental integrity, proportionality, and alignment with IPCC guidance. Empirical Data versus Default Values The methodology establishes a clear hierarchy of data quality. Higher-tier approaches (site-specific measured or modelled data) are prioritized where feasible. IPCC default values are permitted only where it is not reasonably possible to obtain site-specific data and always subject to uncertainty control. For significant carbon pools, field-based inventories are required. The term “significant” will be clarified in the revised version to refer to those carbon pools that materially influence the total estimated project emissions or removals. The definition will be linked to a measurable threshold associated with proportional contribution and risk of material error, consistent with materiality and uncertainty management principles. Natural Recolonization and the 10-Year Criterion The 10-year period without natural recolonization is intended as an indicative eligibility screening criterion, not as an automatic trigger for revegetation. The methodology requires assessment of the factors preventing natural recovery. Where ongoing pressures limit recolonization, project design must prioritize the removal or mitigation of underlying causes. In such cases, interventions may be classified as ecological restoration rather than revegetation.

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			Eligibility is therefore grounded in functional ecosystem recovery, not solely in planting activities. Determination of Sediment Depth The methodology references commonly applied sampling depths but does not impose a uniform requirement. Sampling depth must be technically justified based on site stratigraphy, geomorphological context, and sediment characteristics. Where sediment properties vary significantly with depth, the proponent shall justify the selected sampling horizon and ensure consistency between baseline and project scenarios. Depth determination must avoid systematic over- or under-estimation and comply with the principles of conservatism and uncertainty control. The revised version will reinforce the expectation of site-specific technical justification supported by defensible evidence. Optional Components and Significance Thresholds The methodology is based on a materiality principle: components are mandatory when they materially influence estimated emissions or removals. The revised version will feature: - The conditions that trigger mandatory measurement requirements; - The operational definition of “significant”; - The relationship between optional provisions and materiality criteria.
9	Idioma original: General Comments: (1) Emphasis on restoring ecological function before planting is very welcome and important. This is a key differentiation from	Terms and definitions Section 3.1 Scope;	Thank you for this review. Please find responses to each point below:

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	terrestrial projects and often overlooked in blue carbon projects. It's great to see that this concept is such a central part of the methodology. (2) Similarly, the division into restoration and revegetation is smart, as it emphasizes the different project activities associated with these types of efforts. (3) The potential incorporation into terrestrial REDD+ is interesting, as it addresses the land-to-sea approach increasingly prioritized by restoration practitioners. (4) The methodology often lists a number of items that project proponents are required to undertake, but it's not always clear whether those items are actionable or the level of detail required. For example, Section 4.1 includes a number of rather complex considerations as part of the preliminary analysis, but a project proponent would have a number of outstanding questions about actually executing them, such as where the information should be reported, if there is a specific section or subsection of the methodology with more details, etc. (5) In theory, it makes sense to incorporate all habitats into a single equation and project. It would probably work in practice, but Cercarbono may want to consider a limit on the number of active interventions. Fig 2 (which provides an example) looks very chaotic and it's unlikely that a project proponent would undertake so many different types of interventions at such a granular level. (6) Requiring allochthonous soil C deduction is in line with other blue carbon methodologies. (7) It's great to see the emphasis on direct measurements of soil C, as this is necessary to accurately quantify soil C accumulation. (8) The preference for Tier 2 or 3 approaches to identify emission factors will increase accuracy (pg 46). Page 51 further indicates that site-specific values should be first preference for carbon stocks and emissions. However, there is some confusion	Section 4.1 Preliminary Analysis; Section 6.2 CCMP Spatial boundaries; Section 6.3 Confirmation of Activities; Section 6.4 Carbon pools; Section 7.2.1 Carbon stock estimation; Section 8.1 Carbon stock estimation ; Section 8.2 GHG emissions sources estimation; Section 8.5 Project leakage ; Section 14 Safeguards;	General Comments 1. Ecological restoration Prioritizing functional ecological recovery before planting is a core principle of the methodology and reflects sound ecological foundations. Sustainable carbon accumulation depends on restoring ecological processes, not merely vegetation cover. 2. Restoration / revegetation distinction This distinction recognizes substantive differences in intervention types and their carbon accounting implications, ensuring clarity in CCMP design. 3. Integration with REDD+ Clear accounting boundaries are maintained, allowing landscape-scale coherence without sectoral overlap. 4. Actionability of requirements Cross-referencing and reporting clarity in the PDD will be strengthened without introducing new substantive requirements. 5. Number of interventions The methodology allows multiple segments but does not require complex designs. Illustrative figures will be reviewed for clarity. 6–7. Allochthonous carbon and direct soil carbon measurement These elements are fundamental to ensuring conservatism and scientific robustness in quantification. 8. Data hierarchy

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	on pg 53, which lists national or subnational inventories as the first source for C stocks. The paragraph following indicates that empirical field inventories can be used if no adequate data exist; shouldn't it be the opposite? (9) Avoided emissions can be undervalued in the market, but they are very important from an ecological perspective (preventing further degradation of peat soil and preventing further emissions of GHGs). Therefore, it's a strong point of the methodology that it includes <u>both</u> avoided emissions and net removals in the mitigation equations. (10) On pg 17, the inclusion of reducing nutrient inputs in seagrass meadow project activities is interesting but likely impractical. Poor water quality is often a cause of seagrass decline, so it makes sense to encourage projects to address it. However, the way that eutrophication is reflected in the methodology requires connecting changes at a certain point upstream to changes in eutrophication downstream - and in the project location specifically. That's very difficult when working on a watershed scale (small or large). Eutrophication can be caused by factors outside the project's control, and although the project activities can include actions to reduce eutrophication, there could be spikes in nutrient loading that have nothing to do with the project. So although eutrophication is reflected in the emissions equations, there may be doubt about whether project activities were actually effective at reducing eutrophication in the project area (vs another location in the watershed) and/or whether observed eutrophication could have been controlled by the project (e.g., if it was due to nutrient influx from another source). This is a good idea but too difficult to implement in a methodology like this without adding onerous guardrails and monitoring requirements. (11) Avoided sediment disturbance in seagrass meadows is listed as a source of avoided emissions. How will projects ensure		The hierarchy will be clarified to avoid ambiguity, prioritizing site-specific empirical data where feasible. 9. Avoided emissions The inclusion of both avoided emissions and net removals reflects a comprehensive mitigation approach for coastal wetlands. 10. Nutrient reduction and eutrophication The comment will be considered in the final version of the methodology in order to strengthen clarity regarding the attribution and control criteria required for quantifying emission reductions associated with nutrient reduction. 11. Sediment disturbance The comment will be considered in the final version of the methodology to strengthen clarity regarding effective control criteria and the evidence required when quantifying reductions associated with avoided sediment disturbance. 12. Safeguarding Principles assessment Accepted. The distinction between guidance and mandatory requirements will be clarified to strengthen verifiability. On the other side, Cercarbono does have templates which feature highlighted elements (Safeguards compliance statement and Safeguard compliance report), available at: https://www.cercarbono.com/documents/, section: Requirements for the development of CCMP", which we invite you to check. Specific Comments:

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	that sediment disturbance does not happen, given that they're not conservation projects? For example, restoring a seagrass meadow does not mean that boat anchor scarring will cease. (12) The draft methodology references the Safeguarding Principles and Procedures of Cercarbono Certification Programme. That document is very detailed in terms of guidance, but it does not include a template or framework for an auditor to assess whether the guidance has been followed. It's not clear what is guidance and what is a requirement. We would suggest more clarity on this component in order to make the principles truly actionable and measurable. Specific Comments: (1) In the Definitions, the use of "non forest coastal wetlands" vs "non forest coastal marine wetlands" is confusing. It seems much simpler to refer to them as tidal marshes and seagrass meadows, since that's effectively how they're defined. This carries through to the diagrams (e.g., Fig 1) and equations, making them unnecessarily confusing with long similar acronyms. (2) The explanations of strata, segment, and segment components on pg 30 are extremely confusing. It might help to include an explanatory diagram. (3) There's a reference error in Section 6.4. (4) In Table 2, including dead wood if > 5 to 10 % total C makes sense, as that captures the situations that would benefit from accounting for dead wood (i.e., a storm event that resulted in widespread vegetation mortality). (5) It would be helpful to include more details on the socio-economic requirements for baseline (pg 49). This seems like a promising feature but there isn't enough detail for it to be sufficiently actionable. (6) Table 6 has an incomplete sentence in the bottom right cell.		1. Terminology: Terminology will be simplified to improve clarity. 2. Strata and segments: An explanatory diagram will be considered. 3. Reference error: Will be corrected. 4. Dead wood threshold: The materiality-based logic is confirmed. 5. Socio-economic baseline: Operational clarity will be expanded. 6. Table 6: Will be corrected. 7. FPIC: FPIC will remain mandatory where affected communities are present. Its applicability will be clarified to prevent undue omission.

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	(7) In Section 14, when would FPIC not be applicable? This is a vital part of blue carbon projects, so the methodology should not offer such an easy way for project proponents to avoid FPIC.		