

Process: Public consultation of the methodological document
Version: 13/08/2020

The Methodological Document Quantification of GHG Emission Reductions or Removals from GHG Sectoral Mitigation Projects. Activities that avoid land use change in high mountain ecosystems (Version 1.0) includes aspects related to the definition of activities that avoid land use change in high mountain ecosystems, spatial and temporal limits, causes and agents of land use change, identification of the baseline and additionality scenario, management of uncertainty in the baseline quantification and mitigation results, as well as the management of risks and leakage and non-permanence.

The document was published on the ProClima website (www.proclima.net.co) on June 26, 2020, with a period of 15 working days for comments from stakeholders. Additionally, it was sent to the following stakeholders via e-mails.

Organization	Name	Position
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Econat Ltda.	Henry Garay	Chief Executive Officer
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	IDEAM	Through Finagro

PROCLIMA thanks those who sent their comments, contributing to the joint preparation and providing clarity to the document, so that GHG mitigation initiatives follow the rules, applying appropriate procedures and concepts.

The following are the observations, comments or suggestions and clarifications or adjustments and modifications resulting from the process.

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Entity	Reference	Comment, observation or suggestion	Clarification / Adjustment
BIOFIX	Section 4. Conditions of applicability is mentioned in item b. Identified causes of land use changes include expansion of the agricultural frontier, timber extraction, mining activity and expansion of urban infrastructure.	<p>It is considered that, in certain regions of these ecosystems, land use changes can be reduced over a 10-year period and, if necessary, the option of extending the historical analysis periods to 15 or 20 years could be considered.</p> <p>It would also be possible to leave "infrastructure expansion" as a general cause, to consider the inclusion of roads, equipment, and buildings for industrial and agricultural production that are not necessarily immersed in an urban configuration.</p>	<p>The scope of the methodology is to encourage activities that avoid land use change in high mountain ecosystems (Section 1). To include a historical period longer than ten years could lead to an overestimation of the risk. If in an area "land use changes can be reduced" in the last ten years, it would imply that the scenario with and without the project is not different. Meaning, the initiative does not require carbon credit revenues to avoid changes.</p> <p>as a cause of land use change, urban infrastructure expansion was removed. These changes are usually associated with planned processes. The applicability conditions are updated to restrict the scope to unplanned changes in land use.</p>
	Section 4. Conditions of Applicability is mentioned in item c. Project activities do not include drainage in the project area and drainage activities outside the project area do not affect areas in the project boundaries.	It lends itself to multiple appraisals, we would recommend complementing the wording or providing clarity on the concept of drainage and its link to the project activities under the criterion of whether it is applicable or not. Is it seen from the point of view of water supply for the activities? Does it exclude water bodies from the spatial analysis? Does it refer specifically to the areas within the project boundaries?	<p>The project activities mentioned in this applicability condition refer to those proposed by the owner of the initiative to avoid changes in land use.</p> <p>However, for clarity, the applicability condition is modified: Project activities to avoid land use change do not include drainage.</p>
	Section 4. Conditions of applicability is mentioned in item d. Soil disturbance attributable to the project activity does	It is understood that only 10% of the territory may be used for lines of action focused on productive processes or other land uses. If so, it would be appropriate to modify the wording: The alteration of the soil	The condition of applicability is related to the preparation of the land for the activities proposed by the initiative owner to avoid the change of land use.

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	not cover more than 10% of the surface area within the project boundaries.	attributable to the productive activities of the project... If what the item refers to differs from what is mentioned, more clarity could be provided.	Therefore, the soil disturbance generated by activities carried out to avoid land use change cannot exceed 10%.
	Section 4. Conditions of applicability is referred to item f.	What would be the methodological recommendation to carry out the quantification of GHGs other than CO2 generated by fires in the monitoring period?	The methodology indicates in its footnote 16 the following: Quantification of CH4 and N2O emissions caused by combustion by woody biomass is estimated from the guidelines presented in the 2006 IPCC guidelines for national greenhouse gas inventories. Volume 4. Agriculture, forestry and other land uses. Non-CO2 greenhouse gas emissions from biomass burning.
	Section 4. Conditions of applicability is referred to in item f.	In the case of GHG sources (CH4 and N2O), if there are no fires according to the historical assessment of the project, how should they be justified in the project calculations, is the secondary information from the GIS analysis on historical fire behavior sufficient?	The applicability condition indicates that "the quantification of GHGs other than CO2 should be included in the quantification of emissions caused by fires during the monitoring period". Additionally, Table 2 Emission sources and GHGs indicates that CH4 and N2O emission should be included <u>if the presence of fires was identified in the monitoring period</u> . The methodology does not require historical justification for the presence of fires. The absence of fires in the baseline does not guarantee the absence of fires in the monitoring period.
		What happens with forest and natural cover areas within the project boundaries that are below 2600 m., would a methodological deviation be allowed, and could the quantification methodology ProClima 2.1 be used?	The methodology is updated to provide greater clarity in the activity data and emission factors that can be used by the initiative owner. The document methodological for activities that prevent land use change in high mountain

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		If it could be used, how would natural cover stratification be addressed?	<p>ecosystems focuses on activities that prevent the change of natural vegetation cover from moorland to other land uses.</p> <p>Activities that avoid deforestation and forest degradation shall apply the methodological document (AFOLU Sector) Quantification of GHG Emissions or Removals from REDD+ Projects. In its most recent version.</p> <p>For Ecological restoration activities, the project owner shall follow the methodological document GHG removal forestry activities and oil palm cultivation (AFOLU sector). In its most recent version.</p>
	Section 6	In the definition of Project start date: "date on which the implementation of the project activities, directly related to the reduction of land use changes, begins" Does it allow the inclusion of activities to improve the quality of life: health, education...?	Project activities must be directly related to the reduction of land use changes. In case of including activities that aim to improve the quality of life, the owner of the initiative shall demonstrate the link with the decrease in the land use changes. It is suggested that the initiative holder presents how the trend of land use changes has decreased with the implementation of such activities.
	Section 7.1.1, in the condition a), the identification of the project expansion area during the validation process.	Could it not be limiting the possibility that new areas within the subsequent verification stages could be excluded from the project in case they were not contemplated within the validation?	<p>The project formulation must include the expansion area since the inclusion of new areas must comply with the validated conditions.</p> <p>If the project includes new areas that were not contemplated from the beginning, the initiative holder would have to do a project validation for those areas, complying with all requirements (including baseline and additionality). Therefore, it is not</p>

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			possible to add areas in processes subsequent to the project validation.
		It is recommended that the process of determining the reference region be complemented with the evaluation and incorporation of climatic and geographic variables based on a combination of available geospatial data, such as slope, elevation, precipitation and average annual temperatures. In order to ensure that the reference region is similar in these criteria to the project area.	<p>The determination of the reference region is an integral process.</p> <p>The variables mentioned are included in section 7.1.2.</p> <p>Considering the scope of the methodology (avoidance of land use change), the reference region must reflect the risk faced by the project area. Therefore, it is necessary to assess the mobility of the agents causing the change and the possibility of change.</p>
		In determining the reference region, is it necessary for this area to be fully included within the altitudinal consideration of high mountain ecosystems presented by the methodology?	<p>Yes, high mountain ecosystems have characteristics that differ from those of their neighboring ecosystems, which is why there is an independent methodology.</p> <p>A criterion is added to section 7.1.2 for clarity: <i>The reference region is bounded by the moorland complex in which the project area is located.</i></p>
	Section 6. Definition of forest.	We recommend the removal of "palm crops" within the tree cover exclusion, given that due to the type of ecosystem this productive activity is not viable.	<p>The definition of forest cannot be modified. This corresponds to the national definition for climate change issues (SMBYC-IDEAM).</p> <p>The methodological document, for activities that prevent land use change in high mountain ecosystems, focuses on activities that prevent the change of natural vegetation cover from moorland to other land uses.</p> <p>The definition of forest is included to clarify that a project may combine methodological</p>

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			documents according to the land cover to be included.
	Section 7.1.2. Item e): Areas with restricted access to the agents and causal agents of the changes in land use should be excluded.	How would the determination of the reference region be affected by these restricted access areas? Wouldn't this be a particularly applicable criterion for the leakage area?	Section 7.1.2 is updated for clarity.
	Section 6. Natural vegetation cover, other than forest.	Considering that the methodology contemplates the inclusion of natural vegetation cover under the legend adapted for Colombia from Corine Land Cover, what are the sources of information that the methodology considers reliable to extract the biomass contents in the carbon pools? would this estimation imply carrying out field plots?	Section 12.3 has been updated for clarity.
	Section 11.2.1	What is the projected percentage of decrease in land use change (%DP) due to the implementation of the project or between what ranges can it be estimated, is valid the 10% used in the other Proclima methodologies?	The projection of the decrease in land use changes due to the implementation of project activities (%DP) is defined by the initiative holder based on the expected impact of the implementation of project activities. The 10% mentioned in the methodology is associated with the percentage increase in emissions in the leakage area due to the implementation of the project activities. Note that both percentages are defined in projected scenarios. In other words, they do not have an impact on the estimates resulting from monitoring.
	Section 11.2.1	For the calculation of the Projected Land Use Change (per year) in the with-project scenario, is there a	See answer above

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		recommended default percentage for the projected decrease in land use change due to the implementation of project activities - %DP?	
CO2Cero	Section 4	Condition "c" stated as "project activities do not include drainage in the project area and drainage activities outside the project area do not affect areas within the project boundaries;", does not evidence clarity regarding the inclusion of drainage and its affectation within the project boundaries.	<p>The project activities mentioned in this applicability condition refer to those proposed by the initiative owner to avoid changes in land use.</p> <p>However, for clarity, the applicability condition is modified: Project activities to avoid land use change do not include drainage.</p>
	Section 7.2.2	Should the emission sources listed for the calculation (CH4 and N2O) be included as emissions in the baseline? If not, how is the calculation of these emissions involved in the development of the project?	<p>The applicability condition indicates that "the quantification of GHGs other than CO2 should be included in the quantification of emissions caused by fires during the monitoring period".</p> <p>Additionally, Table 2 Emission sources and GHGs indicates that CH4 and N2O emission should be included if the presence of fires was identified during the monitoring period.</p> <p>The methodology does not require a historical justification for the presence of fires. The absence of fires in the baseline does not guarantee the absence of fires in the monitoring period.</p>
	Annex A	Annex A presents the carbon content in vegetation and soil, during the estimation of emissions and removals associated with carbon pools within the historical analysis. Is it strict to use these data as a reference or can those that present similar conditions and are not	The approach of the methodological document is clarified in section 1 and guidelines for the selection and application of emission factors are updated in section 12.3.

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		contemplated within it be included ?	
	General	According to this methodology, which are the validation and verification bodies (VVO) in charge of approving it?	Methodologies are not approved by validation and verification bodies. They are subject to public consultation and stakeholder comments are fully considered.
South Pole	Section 4 (a) the project activities avoid the land use change in high mountain ecosystems	It is not clear whether the definition given in the introduction and glossary of the methodology will be applied and whether under this definition any ecosystem is susceptible to the definition of a project independent of vegetation cover.	Section 1 was updated for clarity. The methodological document focuses on activities that prevent the change of natural vegetation cover from moorland to other land uses.
	Section 4 (b) the causes of land use changes identified include: expansion of the agricultural frontier, timber extraction, mining activity and expansion of urban infrastructure.	It is not clear whether the methodology is applicable to planned or unplanned degradation, especially because of the land use changes mentioned in the applicability conditions.	Section 4 was updated: project activities avoid unplanned land use change in high mountain ecosystems.
	Section 6. Definition of wetlands.	The methodology presents three different definitions for wetlands, which are not necessarily applicable to mitigation projects, moreover their applicability for the objective of this methodology is not clear, nor is the complementarity or the differences between them. A definition is suggested together with MADS of the applicable definition for the country and especially for the development of projects of this nature.	Section 6 - definition of wetlands is updated. The IPCC definition is adopted. In order to maintain consistency with the National Greenhouse Gas Inventory.
	Section 6. Definition of moorlands	Although it presents the official definition of Country? , it is impossible to ignore its qualitative	Section 6 - definition of moorland and eligible areas is updated.

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		and subjective nature since it does not clearly refer to the sources of information which clearly define the limits of the moorlands in the country or, failing that, the upper limit of the Andean forests and the lower limit of the glacier areas. As with the previous definition, we suggest a joint definition with MADS of the applicable definition for the country and especially for the development of projects of this nature.	
	Section 7.1.1.	The criteria for delimiting the project boundaries do not clarify the sources of information applicable in order to verify the natural condition of non- forest vegetation in the project areas and thus define the eligible areas. The methodology should compile and suggest a list of official information approved by MADS for multi-temporal verification of non-forest vegetation cover and calculation of historical degradation trends.	<p>To date, there is no official information available for the country that would allow a multi-temporal analysis of the change in the natural cover of all the moorland complexes.</p> <p>Therefore, the owner of the initiative shall perform the land cover classification to find the historical tendency in the land use change.</p>
	Section 7.1.2	The methodology should clearly specify the thresholds so as to establish similarity between the reference region and the project area, especially due to the high risk represented by the subjectivity of the criteria presented here for the definition of the deforestation/degradation baseline. Additionally, there is no clarity regarding the applicability of the methodology for projects that seek to halt planned deforestation/degradation. Same comment for the delimitation of the leakage belt (Section 7,1,3, Page 20).	<p>Section 7.1.2 was updated to provide greater clarity in the delimitation of the reference region.</p> <p>Section 1 has been updated to clarify the scope of the methodological document.</p>

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	Section 7.1.2	There is no clarity regarding the criteria defining restricted access areas (road density, slope, geographic restrictions, etc.).	Section 7.1.2 was updated to provide better clarity in the delimitation of the reference region.
	Section 7.1.2	There is no clarity regarding the criteria defining adequate cartographic information for land use assessment (sources of information, expected accuracy of the sources or cartographic products, etc.).	Section 12.2. was updated with guidelines for the delimitation of natural cover. The accuracy of the guidelines is discussed in section 13 (uncertainty management).
	Table 1	Clarify whether the inclusion of soil organic carbon in emission reduction accounting is done separately from root biomass. In international voluntary standard methodologies, it is common that when soil organic emissions are quantified, root biomass is not quantified separately.	The methodology follows the assumptions used in the national NREF. Section 12.3 is updated for clarity. The belowground biomass emission factor cited in this methodology corresponds to roots greater than 5 mm in diameter. The SOC emission factor presented in the methodology comes from IGAC data and it is assumed that the quantification of %OC includes a screening of soil samples (<2 mm).
	Section 7.3.1	It is not clear why it is necessary to establish historical deforestation/degradation trends of the leakage belt if usually the baseline delineation of this area starts from the analysis of the reference region in a similar way as it is done for the project area.	Section 7.3 was updated
	Section 9	The methodology does not establish clear procedures for the definition of the key elements in the characterization of causes and agents of land use change. Being a methodological document, it should specify in detail each of the elements mentioned and present the step-by-step for their definition, as well as the	Section 9 was updated

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		type of information sources accepted (secondary information, surveys, etc.), especially considering the implications of the results of this analysis for the definition of project activities.	
	Section 11.1	There is no clarity regarding the criteria for the delimitation of strata based on the quantification and monitoring of SOC. The methodology could better specify, for example, statistical criteria with respect to soil organic carbon content with which the strata could be defined.	Section 12 is updated. Stratification is limited by natural cover. In the case of COS, the methodology uses the approach proposed by IGAC (2020), which stratifies carbon according to the moorland complex.
	Section 11.3	The proposed equation for estimating emissions from organic soil is not considering the change in land use and, on the contrary, assumes that in 20 years, after the land use change event, the total SOC would be released which is not necessarily true, especially in high mountain environments where environmental conditions facilitate carbon conservation. As a suggestion, the proponents should establish the expected change in carbon content per hectare and divide this by the 20year period.	Section 12.3 was updated for clarity.
	Section 11.4	The SOC emission factor is never multiplied by the expected area of change for the project area. The calculation is not presented neither for the baseline nor for the project scenario despite the fact that in the equations for estimating annual emissions, the COS is per hectare. It is suggested that the proposed procedure for estimating SOC emissions be reviewed in detail.	Section 12.4 (GHG emissions in the analysis period) was updated to correct the formula.
PNN	General	The methodology establishes the sources of emissions, identified	The methodological document focuses on quantifying emission

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		as of fire or combustion; however, it is not clear whether transitions to other land covers are considered potential sources of emissions.	<p>reductions by avoiding natural land cover change to other land uses. Section 12.3 clarifies the assumptions used to determine the emission factors.</p> <p>In summary, the baseline scenario estimates the expected emissions if land use changes continue according to the historical trend in the reference region. In the scenario with the project (activities to avoid such changes), emissions are estimated again (monitoring period). The difference between the two estimations determines the emissions reduction; in other words, without the project activities, there would be emissions associated with land use change.</p>
	General	It is not clear how to estimate a baseline limited exclusively to the limits of the project, considering that if the change of use or cover is avoided, the processes occurring in the reference areas would have to be taken as a baseline scenario (this includes, for example, moorland areas already converted to other uses).	Section 7.1.2 was updated to provide greater clarity in the delimitation of the reference region.
	General	We understand that the AFOLU Methodology for forestry projects should be used for restoration projects. However, we are concerned about the restriction of organic matter content greater than 12%, which will surely be exceeded in several of the moorlands and HME of the National Parks.	In the case of projects in high mountain ecosystems, GHG removal activities can be included, applying the ProClima methodology (GHG removal activities and oil palm cultivation), excluding the organic soils criterion.