The BCR0014 High Forest Low Deforestation (HFLD) Asia Pacific Methodology is part of the BioCarbon Standard, the greenhouse gas (GHG) program of BioCarbon.

This methodology provides the framework for quantifying, monitoring, and verifying emission reductions achieved through the conservation of High Forest Low Deforestation (HFLD) areas in Asia-Pacific contexts.

In accordance with the BioCarbon Standard's public consultation procedures, the draft version of the methodology was published for a 30-day consultation period to receive feedback from technical experts, project developers, auditors, and stakeholders across the voluntary carbon market.

BioCarbon gratefully acknowledges the comments received from Mr. Rahul Kar, Associate Partner at EY-Parthenon, EY Corporate Advisors Pte. Ltd. His observations were useful to further assess the clarity, objectivity, and practical applicability of several provisions of the methodology, and contributed to strengthening specific aspects of the final revised version.

All comments received were carefully reviewed by the BioCarbon Technical Team and, where relevant, adjustments were incorporated to strengthen clarity, consistency, and alignment with the BioCarbon Standard.

The following table summarizes the comments received and the corresponding clarifications and adjustments made during the revision process.

ANNEX A. BioCarbon Standard Public Consultation

Name	Rahul Kar
Position / Role	EY-Parthenon Associate Partner
Organization	EY Corporate Advisors Pte. Ltd.
Email	Rahul.Kar@parthenon.ey.com
Date	24/03/2026

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
1	General / Page 2 (Para 2)	Why this methodology is specific to Asia-Pacific/Southeast Asia. Conditions stated here could exist in other regions also.	The regional scope has been intentionally maintained. This methodology was specifically developed for HFLD REDD+ activities in Asia-Pacific contexts, reflecting the land-use dynamics, forest-risk patterns, enabling conditions, and frontier pressures commonly observed in this region. Expanding applicability beyond Asia-Pacific would require a broader methodological recalibration rather than a drafting change. To improve clarity, the scope section was revised to explain the rationale for the regional applicability of this version.

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
2	Page 10, Page 12 (para 5.3 (b)) and others	Where drivers/agents of deforestation/degradation are explained, you could consider adding "unregulated, illegal and mobile actors of forest clearance and forest resource extraction".	The comment was accepted. The methodology was revised to clarify that the assessment of drivers and agents may include regulated, unregulated, illegal, informal, mobile, or opportunistic actors where relevant to future deforestation or degradation risk. This strengthens the applicability of the methodology in frontier contexts where forest loss may be driven by dynamic and non-formalized actors.
3	Page 11 (para 5.1 (c)), Pages 16, 18 and 19 (carbon pools) and other references	Exclusion of SOC and wetlands and peatlands in page 11 contradicts inclusion of SOC in other places. There is no reason why wetlands and peatlands should be excluded. Instead, you could consider adding that 'if SOC in baseline scenario is expected to be more than without implementation of the project scenario, then SOC must be included irrespective of the nature of the land where the REDD+ project will be implemented'.	The comment was considered, but not accepted as proposed. The exclusion of peatlands, wetlands, and organic soils is intentional and reflects the limited scope of this methodology, which is not designed for peatland or wetland conservation or restoration activities. However, the text was revised to clarify the treatment of soil organic carbon (SOC). SOC may be included where it is material, conservatively quantifiable, and supported by robust data, provided that the project area does not include peatlands, wetlands, or excluded organic soils. This clarification removes ambiguity without broadening the scope

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			of the methodology beyond its intended applicability.
4	Page 12 (para 5.2 (a))	'… high forest cover …' => a definition on what (or how much) is 'high' will help to make this objective instead of subjective analysis.	The comment was accepted. A definition of High forest cover was added to the definitions section in order to make the HFLD eligibility criterion more objective and consistently interpretable across project activities. The applicability condition was also revised to refer explicitly to that definition.
5	Page 12 (para 5.2 (b) and (c)):	'… low historical deforestation …' => a definition on what (or how much) is 'low' will help to make this objective instead of subjective analysis.	The comment was accepted. A definition of Low historical deforestation was added to the definitions section in order to improve objectivity and consistency in the application of the HFLD eligibility criteria. The applicability conditions were also revised to refer explicitly to that definition. The definition was framed as a methodological criterion of BioCarbon, based on transparent, spatially explicit, and verifiable evidence, rather than attributing it to an external source that does not provide a directly applicable normative threshold for HFLD eligibility.

№	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
6	Page 25 (para 10.2) and others	'… REDD+ …' => an explanation on what will make a project 'REDD+' instead of just 'REDD' will help.	The comment was accepted. A definition of REDD+ was added to the methodology to clarify that, for the purposes of this document, eligible project-level mitigation outcomes may arise from avoided deforestation and/or avoided forest degradation, while excluding afforestation, reforestation, peatland restoration, wetland conservation, and carbon removal activities. This revision improves clarity without changing the intended scope of eligible activities.
7	Page 33 (para 13.6) and others	'… Statistical …' => a guidance on which statistical tools to be used on which type of data, and which formulas/analysis methods can be included for consistent use of statistical approach in different projects using this REDD+ methodology.	The comment was accepted in part. The methodology was revised to strengthen the requirements on statistical robustness, representativeness, reproducibility, data sufficiency, and conservative treatment of data gaps. The revised text clarifies that project holders shall apply statistically robust and justified methods appropriate to the type and structure of the data used. However, the methodology does not prescribe a single fixed set of statistical formulas for all cases, as data types and project conditions may vary. This approach preserves

Nº	**Reference (section and page in the document)**	**Comments, Remarks, Suggestions**	**Clarification / Adjustment**
			methodological rigor while allowing technically appropriate and context-specific application.