

Process: Public consultation  
Version: 05/04/2021

In order to provide greater clarity on specific issues, such as the scope of other GHG projects and conformity assessment bodies, an update of the document was prepared. The Program for Certification and Registration of GHG Mitigation Initiatives and Other Greenhouse Gas Projects was published on ProClima's website ([www.proclima.net.co](http://www.proclima.net.co)) on April 5, 2021, with a 30-day deadline for comments from stakeholders.

In addition, the documentation was sent (in Spanish and English) to the following interested parties by e-mail.

Organization	Name	Position
Asociación Española de Normalización y Certificación - AENOR	José Luis Fuentes	Climate Change Manager
Atmosphere Alternative	Jessica Wade-Murphy de Jiménez	Chief Executive Officer
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Biofix Consultoría	Marco Andrés González	Legal Director
Biofix Consultoría	María Alejandra Garzón Sánchez	Environmental Coordinator for REDD+ Projects
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ECOPETROL	Xiomara Lucía Sanclemente	Leader in Biodiversity, Offsets and Investment 1%. Advisory Member
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Program for Certification and Registration of GHG Mitigation Initiatives and Other Greenhouse Gas Projects. PROCLIMA PROGRAM. Responsibility and Quality. Document for public consultation. Bogotá, Colombia

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During the public consultation period, comments and suggestions were received from South Pole Carbon Asset Management S.A.S., the Ministry of Environment and Sustainable Development (MADS) and XM. PROCLIMA thanks those who sent their comments.

As a result of the public consultation process, the document entitled Program for Certification and Registration of GHG Mitigation Initiatives and Other Greenhouse Gas Projects. PROCLIMA PROGRAM. Responsibility and Quality. Version 3.0. May 13, 2021 is presented.

Annex A (below) presents the observations, comments or suggestions and clarifications or adjustments resulting from the process.

ANNEX A. Public consultation April 2021 – ProClima Program –

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**Date** File received by e-mail the May 4<sup>th</sup>, 2021 (Juan David Mira Martínez, Manager, Project Development - Colombian Projects Lead)

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1	Section 8. Methodological documents and other methodologies, p. 26	It is suggested to mention the other permitted methodologies since this section was entirely focused on Proclima products, and the only reference is made in paragraph 4 to possible methodologies approved by the CDM board; it would be interesting if some of the conditions for the applicability of methodologies external to the standard as well as a clarification on the obligations from Proclima when using different methodologies, which may contemplate the development of sections not required by specific methodologies approved by the CDM. This suggestion also applies to section 10.4 on using appropriate methodologies, specifically for those external to the standard.	<p>It is explained that the ProClima methodologies can be found on the website. <a href="http://www.proclima.net.co">www.proclima.net.co</a></p> <p>Regarding CDM methodologies, project owners can apply methodologies approved by the Executive Board of the Clean Development Mechanism, including rules and procedures, concepts, definitions, methodological tools, etc., that apply to projects MDL.</p> <p>Footnote # 10 is added. CDM methodologies are found at <a href="https://cdm.unfccc.int/methodologies/index.html">https://cdm.unfccc.int/methodologies/index.html</a></p> <p>A compilation of all the CDM methodological tools can be found at <a href="https://cdm.unfccc.int/Reference/tools/index.html">https://cdm.unfccc.int/Reference/tools/index.html</a></p> <p>If everything contained in the methodologies must be applied, including the applicability conditions and tools, it would not be necessary to include in this document what should be developed to demonstrate the application of such methodologies.</p> <p>For the NCRE projects, ProClima prepared the document entitled PROCLIMA. 2020. GUIDELINES FOR THE CERTIFICATION AND REGISTRATION OF PROJECTS. Energy Sector. Non-Conventional Sources of Renewable Energy. Version 1.0. September 14, 2020. Bogotá, Colombia. 67. p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>. This document contains what is related to the methodologies that apply to this type of project, applicability conditions, data, and parameters, among other aspects.</p> <p>It is suggested to bear in mind that ProClima has other documents that make up the Program and define many of the elements related to climate change mitigation projects.</p>

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
2	Section 9. Project types, p. 18 -21	The description of the project types is quite confusing since the applicable categories differ from Resolution 1447 of 2018 (GHG initiatives) concerning what the Program calls "other GHG projects." Therefore, it is suggested to evaluate if there is a significant difference between the country's categories (called GHG initiatives) and the other GHG projects beyond the country where they are developed. For example, suppose the only difference is that the GHG initiatives are developed in Colombia. In that case, it is suggested not to repeat the categories and simply to clarify the regulations applicable to the Colombian territory in the exact text or the footer, as is done in the comment of p. 22 regarding the applicability of the CCV for the non-causation of the Carbon Tax. Considering the adjustments made to these definitions, review the texts of Sections 3 and 4 on Scope and Scope of application, respectively, where reference is also made to these types of projects.	ProClima considers that it is necessary to make the complete list for each case, which allows a description of the requirements for both GHG initiatives and other greenhouse gas projects.  There are other differences, such as retroactivity and all the CDM rules that apply to other greenhouse gas projects.  However, the texts are revised to adjust if it is the case.
3	Section 9. Project types, Explanatory note in subsection 9.1.1, p. 18	It is suggested to be more precise in the writing of the note since the use of the negation "nor" in a consecutive idea can generate confusion. It would be ideal to use statements in this case. It is commented that these restrictions on the forest category should be evaluated from the project start date and five years before it.	After reviewing the wording, it is considered that the phrase is understandable and that the use of "nor" does not leave room for confusion.
4	Section 9. Project types, subsection 9.1.2  REDD + projects, p. 21	In the definition of this type of project, it is mentioned that "they are projects that implement REDD + activities." Since a definition is given, it is not practical to use the term that is being clarified as a response to the definition. Since this has not been addressed in previous sections of the document, it would be pertinent to expressly state what a REDD + activity corresponds to, instead to leave only the acronym; since this generates confusion and can give the reader autonomy in the interpretation to define for their consideration types of REDD + activities due to lack of clarity. As a suggestion, it is recommended to refer to Annex A, where a shortlist of activities classified as REDD + is stated, or to include these considerations directly in the section, as was done with literal e) on waste management and disposal projects.	Within the document, the definition is that one contained in Resolution 1447 of 2018 (article 3, page 8)  REDD + projects include the REDD + activities defined in the glossary of terms.  However, the definition is adjusted to broaden the concept.  The acronym is defined in the acronyms and acronyms section.
5	Section 10.3 Project Scale, p. 23	It is considered pertinent to clarify the cited categories of the CDM. This can be presented, for example, in a footnote, or the composition of the paragraph, as was done in literal c) of section 10.3 for sectoral GHG projects, on line 3 of the paragraph. Similarly, to generate clarification on possible renewals of the CDM guidelines, as presented in footnote number 17.	The text in section 10.2 states the following:  According to the Clean Development Mechanism definitions, the other GHG projects (in sectors other than AFOLU) are subdivided into large-scale and small-scale.  A footnote is added

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
6	Section 10.4 Use of Appropriate Methodologies, p. 2	See comment on section 8 in cell B3	See response to comment # 1.
7	Section 10.3 Quantification periods for GHG emission reductions or removals, p. 23	It is suggested to support or explain in which the Proclima Program is supported for the definition of the quantification periods by type of project, for example, conditions and changes on the baseline of the projects, regulatory frameworks, among others	The standards have the competence and power to decide on the GHG quantification periods of the projects proposed to be certified and registered under the standard rules. Therefore, the ProClima team relies on its experience and the ability to determine these aspects.
8	Section 10.7 Leaks and non-permanence for GHG removal activities and REDD + Projects, p. 27	<p>Clarify what the Program refers to when it mentions "the pertinent authorities as entities in charge of the issue" concerning the permanence of project activities.</p> <p>Additionally, it is suggested to point out that the release of the verified carbon credit reserve should be subject to the fact that the holders of the GHG initiative or the project effectively carry out new monitoring, report, and verification of their GHG reductions or removals and reach a new verification statement. Therefore, it is suggested that only until the verification and issuance of the credits of the new monitoring period, the release of the credit reserve of the previous period is allowed and that the Proclima Program, before carrying out this release, will evaluate the validity of the credits considering the guidelines of Resolution 1447 of 2018 for GHG initiatives (paragraph 3 of Art. 17) or other applicable guidelines for other GHG projects.</p>	<p>Adjusted. That part of the sentence was removed.</p> <p>Regarding the reserve of credits, the text indicates precisely that once the new verification is carried out. "The Verified Carbon Credits and placed in the reserve account, may be released and placed on the market, in a subsequent verification. As long as there has been no cancellation of said credits, as described above."</p> <p>Regarding article 17, paragraph 3, it is clarified that the issuance of the VCC, once the verifications have been concluded (successfully and with an affirmative declaration by the VVB), takes into account the validity of the mitigation results. ProClima has serials, both for the voluntary market and the mandatory markets.</p> <p>It is worth clarifying that ProClima does not issue credits to serve the market that results from the carbon tax in Colombia. Therefore, subjecting all the requirements to comply with R1447 would generate inaccuracies in what is defined by the Certification and Registration Program.</p>
9	Section 10.9. Compliance with national legislation, p. 28	The Program is recommended to consider that, concerning compliance with laws, statutes, or other regulatory frameworks with national scope, it implies that the recipient of the provisions derived from said laws, statutes, or frameworks is the National Government and not the private citizen or entity the proponent of the mitigation initiative at the local level. In this sense, it is the National Government that must materialize the commitments it acquires for said public policy instruments and give the guidelines of what to do at the territorial level. Consequently, the evaluation of compliance with national legislation in GHG mitigation initiatives or GHG projects should be subject to the review, articulation, and compliance of regional and local regulations applicable to the project activity. This is especially applicable to projects in the AFOLU sector, and particularly REDD + projects that should guarantee articulation with forest governance structures, regional and local land use planning, and sectoral planning of the municipalities where the initiative area is subscribed.	<p>The text in the document refers to compliance with the laws applicable to the project activity.</p> <p><u>The holder of the GHG mitigation initiative, or other greenhouse gas project, must demonstrate that it complies with the related legislation applicable to the activities carried out in the field of GHG mitigation</u></p>

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1 0	Section 10.10. Carbon Rights and Ownership, p. 29	<p>For cases in which the owner of the initiative is a natural or legal person other than ethnic groups or local traditional communities, the Program requests the proponent in the first instance the certification of Presence of Ethnic Groups to the Prior Consultation Directorate of the Ministry of the Interior. Regarding this requirement, the Proclima Program must consider the following:</p> <ol style="list-style-type: none"> <li>1. In light of the Manual of the National Registry for the Reduction of GHG Emissions (RENARE), the Ministry of the Environment and the INSTITUTE OF HYDROLOGY, METEOROLOGY AND ENVIRONMENTAL STUDIES (IDEAM ) request this certification from all REDD + projects to be developed in the country regardless of whether their holders are ethnic groups or local traditional communities, so the requirement should not be exclusive for holders other than these groups.</li> <li>2. The Certificate of Presence of Ethnic Groups was replaced by the Certificate of Origin and Opportunity of the Prior Consultation for projects, works, or activities, given the entry into force of Decree 2353 of December 26, 2019, by which the structure of said Ministry and the functions of some of its dependencies were determined. In this sense, and considering that it is the Ministry of the Environment and Sustainable Development (MADS) or whoever takes its place, who will design and guide the implementation of the National Strategy for the Reduction of Emissions due to Deforestation and Forest Degradation, REDD +, in coordination with other ministries under the national climate change policy, and that RENARE is administered by the INSTITUTE OF HYDROLOGY, METEOROLOGY AND ENVIRONMENTAL STUDIES (IDEAM) following the MADS guidelines, it is the MADS who must determine with the Ministry of Interior the applicable procedure for initiatives of GHG mitigation.</li> <li>3. Under Decree 2353 of 2019, the Directorate of Prior Consultation of MinInterior cannot express itself on the need or not to advance the process of determining the origin of the prior consultation, in the understanding that the need for the procedure arises i ) of the enforceability of the environmental or regulatory authority of the GHG initiative or ii) when the executor of this initiative considers that it may cause possible effects on ethnic communities.</li> </ol> <p>Therefore, it is suggested that Proclima, before updating version 3.0 of the Program, inquire with MADS, MinInterior, and the RENARE administration about the progress in defining the procedure applicable to GHG mitigation initiatives concerning the presence of ethnic groups and origin of prior consultation and on the scope of said procedure for REDD + projects regardless of the type of owner of these initiatives.</p>	<p>In any case, everything described in the comment must be complied with since the holders of GHG initiatives (not only REDD + projects) must comply with current regulations.</p>



#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1 1	Section 10.10. Carbon Rights and Ownership, p. 29	The Program guidelines focus specifically on compliance with the requirements at the national level regarding the presence of ethnic groups and set aside mechanisms or procedures applicable to GHG initiatives (especially sectoral projects) and GHG projects to demonstrate ownership and rights over carbon. (ex., certificates of freedom and tradition, certificates of healthy possession, etc.). It is suggested to add broader and general requirements to all types of initiatives or projects. The specific requirements for projects involving ethnic groups remain in an additional section or the footer.	<p>The text does not refer only to ethnic groups. The following is noted:</p> <p>Carbon rights are defined by ownership of verified carbon credits (CCV) and / or rights to benefit from the sale of carbon or other payments or benefits received to reduce emissions or GHG removals. In short, they are the right to benefit from GHG emission reductions or removals. In this sense, the holders of GHG mitigation initiatives and other GHG projects must demonstrate full legal ownership over VCCs.</p> <p>Later, when you talk about ethnic groups, you say, "For example." Furthermore, the land tenure requirements are described in section 11.2.</p> <p>11.2 Land tenure In the case of GHG mitigation initiatives, in the AFOLU sector, the holder of the GHG mitigation initiative must demonstrate land tenure, as provided in CONPES 3859, as follows:</p> <p>(a) the owner is the one who holds the absolute property right that appears in a real estate registration folio;</p> <p>(b) the owner of a property of a private nature is the owner who acts with the intention of an owner with the conviction of being one, but without being able to demonstrate compliance with the requirements of the real estate tradition that legally certify him as the owner;</p> <p>(c) the holder is the one who uses and enjoys a property concerning which the existence of an owner is recognized.</p> <p>The owner of the initiative must demonstrate that he/she holds the land on the property in which the activities of the mitigation initiative are carried out, at least during the period of quantification of the GHG reductions or removals. If the owner of the initiative does not represent the "holder," they must demonstrate that they have an agreement with the person who holds the right to tenure the land.</p>
1 2	Section 10.13 Sustainable Development Goals, p. 32	The Program is suggested not to limit the selection of goals, indicators, and objectives concerning which GHG initiatives or projects can certify contributions, on the contrary, it is recommended to promote in its guidelines the review of Sustainable Development Priorities at the level national (for each host country where the initiative or project is located) and the articulation of the goals of the GHG initiatives or projects with said priorities, making the qualifications that are required for the scale of the indicators and the scope of the monitoring within each initiative.	<p>Adjusted</p> <p>A note on National Sustainable Development Priorities is included.</p>
1 3	Section 10.14 Monitoring Plan, literals k and l, p. 34	It is suggested to reference the special categories and co-benefits in the literals K and L, Section 13 o. Before page 34, a definition clarifies that these two terms are not exposed; said definitions are only clarified later in section 13, which generates confusion to the reader.	<p>Adjusted</p> <p>Reference is made to section 13 of the document.</p>
1 4	Section 11.1 Start date, p. 38, Paragraph 5	Clarify whether the beginning of the validation referred to by the Proclima Program concerning the certification and registration of the initiatives, it is not clear whether this refers to the beginning of the audit process for validation (contracting of the VVB) or to the date of issuance of the project validation statement.	<p>The definition of the start date in the glossary of terms indicates the following: "Validation begins once a commercial agreement has been signed with the VVB."</p> <p>However, it is clarified in a footnote.</p>

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1 5	Section 11.3 Methodology for quantifying and monitoring GHG emission reductions and removals, p. 39 and 40	<p>Clarify whether, under the provisions of the Program regarding the use of methodologies that define mechanisms for the management of leaks, permanence, and uncertainty, the holder of the GHG initiative or projects could combine methodologies with satisfying said mechanisms, considering that Some guidelines applicable to the Program, such as Technical Standard NTC 6208 or NTC 14064-2, Guide for the Formulation, Validation and Verification of Forest Projects for Climate Change Mitigation of ICONTEC Version 02, do not have these.</p> <p>If it cannot be combined, it is suggested that the Program clearly defines in its guidelines its position on the use of NTC 6208 and the ICONTEC Guide for the certification of GHG initiatives or projects under Proclima considering that these two methodologies have been used quite common nationwide.</p>	<p>The reference to NTC 14064-2 is not apparent in this comment.</p> <p>Suppose the reference is to the NTC6208 and the ICONTEC Guide. In that case, it is necessary to clarify that "the Technical Standard NTC 6208 or the NTC 14064-2, Guide for the Formulation, Validation and Verification of Forest Projects for Climate Change Mitigation of ICONTEC Version 02" do not constitute some guidelines applicable to the Program.</p> <p>Regarding "clearly define in their guidelines their position on the use of NTC6208 and the ICONTEC Guide for the certification of GHG initiatives or projects under ProClima": In the documents of the ProClima Program, or its standards and/or methodologies do not refer to the permitted use of the NTC and the Guide, since it is not considered necessary.</p> <p>Finally, what was indicated in the comment as "considering that these two methodologies have been in fairly common use at the national level" is an imprecision that continues to generate confusion. First, the documents mentioned do not correspond to methodologies. As described in the documents mentioned:</p> <p>NTC 6208. MITIGATION ACTIONS IN THE LAND USE, CHANGE IN LAND USE, AND FORESTRY SECTOR (USCUSS) AT THE RURAL LEVEL, INCORPORATING SOCIAL AND BIODIVERSITY CONSIDERATIONS (2016-12-07). 1. PURPOSE AND FIELD OF APPLICATION. This Technical Standard establishes guidelines for the formulation and minimum requirements to certify mitigation actions in the Land Use, Land Use Change and Forestry (USCUSS) sector at the rural level, which incorporate social and biodiversity considerations, ensuring that they are transparent, relevant, reliable, continuous and accurate.</p> <p>GUIDE FOR THE FORMULATION, VALIDATION, AND VERIFICATION OF FOREST PROJECTS FOR THE MITIGATION OF CLIMATE CHANGE. (GUIDE ES-I-CC-002. VERSION: 02.0. 2018/03/01). 1. OBJECTIVE. This Guide establishes the requirements that climate change mitigation forestry projects (3.23) must meet, based on activities in the forestry sector (3.1), to demonstrate transparency, relevance, reliability, continuous, accurate, and consistent.</p> <p>In previous versions of the Program document, a transition period was included for the use of NTC6208, considering some requirements established by ProClima, which were not contemplated in the NTC guidelines. Currently, ProClima has its certification and registration program for climate change mitigation projects (see sections 1.2 and 3 of the document under public consultation).</p>
1 6	Section 11.8 Registration in RENARE, p. 45	<p>It is suggested that the Program, for the certification, registration, and emission of verified carbon credits, obligatorily request the holders of the GHG initiative that their registration in the RENARE platform has had, at least, approval of the feasibility phase and the step to formulation phase. With this, the Program will be able to ensure that 1) there is no incompatible overlap of GHG initiatives with other programs or projects at the national level, 2) the INSTITUTE OF HYDROLOGY, METEOROLOGY AND ENVIRONMENTAL STUDIES (IDEAM) has reviewed and approved the information that the holder of the GHG initiative heap on the platform and 3) that the licensee is ready or in the process to complement the information of the initiative on the platform and reach the implementation phase, in which the licensee reports the mitigation results achieved in</p>	<p>The RENARE rule determines that the project/initiative must comply with what is described in the rule that applies to it.</p>

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		each monitoring period and the cancellations that arise from after that the commercialization of said results.	
1 7	Section 14. Validation and verification, p. 54	Refer to the comment made in cell B16 on the start date of the validation to which the Proclima Program refers since it is not evident throughout the document if the five years coincide with the start of the validation audit process (contracting the VVB) or on the date of issuance of the project validation statement. However, this section refers to this fact as the beginning of the validation, so it is essential to clarify whether it effectively restricts the contracting of the VVB. If not, it should correspond to the issuance of the validation statement. This, to avoid various interpretations of what is expressed	It is suggested to read the document:  PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>  Considering that all the rules and procedures that apply for the certification and registration of projects are not only contemplated in the document submitted for public consultation.
1 8	Section 14. Validation and verification, p. 54	It is suggested to include within the scope of the validation and/or verification the review of project leaks and the agents and drivers of deforestation involved, so what is stated in the design documents of the project and/or monitoring can be corroborated in the territory. It also applies to sections 14.1 and 14.2	Section 14 deals with the scope of validation.  In the other sections, what is mentioned in the comment is included.
1 9	Section 14.1 Validation, literal e, p. 55	It is advisable to clarify the applicability conditions of the evaluation of the Maximum Mitigation Potential under the guidelines established in articles 40 and 41 of Resolution 1447 of 2018.	Section 10.8 Mitigation Results provides the following:  GHG mitigation initiatives and other greenhouse gas projects must demonstrate their mitigation results within the framework of meeting national climate change goals established under the UNFCCC and/or the one that dictates binding norms in this regard.  Likewise, they must guarantee that the GHG mitigation results obtained due to their implementation are verifiable within the framework of ISO 14064-3: 2019 or the one that updates it.  Therefore, the maximum mitigation potential is included in what the headlines of the initiatives must comply with. Additionally, it is the competence of the validation and verification bodies to define the means of verification regarding compliance with the standard.
2 0	Section 14.4 Validation and verification statement, p. 58	The Program is suggested to consider the annual report of GHG emission reductions or removals within the requirements for the verification statement.	Section 14.4 outlines what, in general terms, the validation and verification statements should contain. The rest is contemplated in the Validation and Verification Manual, in which this requirement is included.
2 1	Section 16. Other GHG programs, literal e, p. 62	It is recommended to clarify in literal e what the Program refers to with "PROCLIMA project cycle" since this concept is not introduced in any section of the document, nor is it related to any process or explanatory graph.	A footnote is added.
2 2	Section 16. Other GEI programs, p. 62	Clarify in the last paragraph that the conditions of the start date specified there refer to projects in the process of migration from other registries to Proclima to avoid confusion due to how the statement was written.	Adjusted

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
2 3	Section 17. Registration platform, p. 63	It is pertinent not to limit the prohibition on the exclusivity of the registration of projects only at the local level (Colombia), as stated in the last section of this page, since, if the projects are also registered under platforms registration of international standards, will also generate associated inconveniences on accounting. So it would be necessary to rethink the statement so that registration is not allowed on two different platforms, regardless of the country from which it comes.	Adjusted Phrase deleted.
2 4	Section 10.11 Environmental aspects, p. 31 and 32	The holders of GHG initiatives or projects must carry out an environmental assessment, analyzing the foreseeable effects on biodiversity and ecosystems within the project's limits. Reliable and recent references must support the analysis. An environmental evaluation at the end of its analysis seeks to identify, prevent, correct, mitigate, or compensate for the impacts generated by executing a project, work, or activity. Although projects for the reduction or removal of GHG emissions, by their nature, do not require impact analysis such as an Environmental License, because they do not cause severe deterioration to renewable natural resources, or the environment, if it is essential not only to involve biodiversity and ecosystems but add to the analysis item 10.12 Socio-economic aspects of the Proclima Standard. In addition to this, more specific tools must be provided on what is to be achieved with the analysis or how the environmental assessment is intended to be addressed because it is up to the assessor's consideration.	It is important to note that GHG mitigation initiatives and other greenhouse gas projects must consider the principles of relevance, full coverage, coherence, etc. Not just for GHGs. On the other hand, quality assurance is a definitive criterion. The licensees must carry out the evaluations based on compliance with the rules and procedures transparently and appropriately. Finally, it is the responsibility of the conformity assessment body to determine the relevance and accuracy of the assessment.
2 5	Section 10.12 Socio-economic aspects, p. 31	Suppose the evaluation concludes that relevant negative effects would be generated. In that case, the owner of the initiative or project must define actions and corrective measures to prevent and/or reduce the socio-economic effects derived from developing the activities of the GHG mitigation initiative. As mentioned in the comment on the environmental assessment (cell A27), a strategy for the environmental assessment must be defined since the "relevant negative effects" will depend on the reader's perception.	See response to comment # 24. It is not appropriate to point out the following: "will depend on the perception of the reader." Some models and methods allow the identification and evaluation of the qualification of the effects and the mitigation measures.
2 6	Section 11.7 Additional requirements for oil palm crops. P. 44 and 45	IV. The head of the GHG mitigation initiative must consider a risks and impacts assessment of the water resource in the area of the basin in which the project is located. According to this numeral, four literals are listed that are intended for the evaluation of these impacts. First, however, it should be clarified whether secondary information is allowed or necessary to collect preliminary information to respond to these literals.	The evaluation of risks and impacts on the water resource must be carried out using methods designed for this purpose.
2 7	Section 7, literal d, p. 16	Adjust the word "verification" since it is included in the document as "verification."	Adjusted

#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
28	Section 8. Methodological documents and other methodologies, p. 26	<p>It is suggested to mention the other methodologies allowed since this section was entirely focused on Proclima products. The only reference is made in paragraph 4 to possible methodologies approved by the CDM board. It would be interesting if some of the conditions for the applicability of methodologies external to the standard and clarification on the obligations from Proclima when using different methodologies may contemplate the development of sections not required by specific methodologies approved by the CDM.</p> <p>This suggestion, in turn, applies to section 10.4 on the use of appropriate methodologies, specifically for those external to the standard.</p>	repeated with comment # 1
29	Section 9. Project types, p. 18 -21	<p>The description of the project types is quite confusing since the applicable categories differ from Resolution 1447 of 2018 (GHG initiatives) concerning what the Program calls "other GHG projects." Therefore, it is suggested to evaluate the country (called in this document GHG initiatives) and the other GHG projects, regardless of where they are developed. Suppose the only difference is that the GHG initiatives are developed in Colombia. In that case, it is suggested not to repeat the categories and simply to clarify the regulations applicable to the Colombian territory in the exact text or the footer, as is done in the comment of p. 22 regarding the applicability of the CCV for the non-causation of the Carbon Tax.</p> <p>Considering the adjustments made to these definitions, review the texts of Sections 3 and 4 on Scope and Scope of application, respectively, where reference is also made to these types of projects.</p>	repeated with comment # 2
30	Additional Recommendations	Adopt a good practice under compliance with REDD + Safeguards. It is suggested that Proclima evaluate the possibility and applicability of a public comment period in the registry of projects before issuance.	<p>It is contemplated. The developers of the registration platform are working in this regard.</p> <p>However, what was related to the subject was not included in the document. This requirement is addressed.</p>

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N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1	General	The terms between the document and resolution 1447 of 2018 should be homologated to understand both in the public one better. For example, the OECs are the same VVBs.	<p>The ProClima Program is not exclusively directed to GHG mitigation initiatives and/or projects intended to participate in the Colombian market or the carbon tax in Colombia.</p> <p>The Certification Program and the ProClima standards are proposed to certify and register other initiatives and projects (even outside of Colombia); therefore, the terminology is also used in a way that contemplates broader terms, all of them contained in international standards that configure terms and definitions related to the subject.</p> <p>As described in ANNEX A of the document submitted for public consultation:</p> <p>Conformity Assessment Bodies (OEC): Body that carries out conformity assessment activities that can be accredited.</p> <p>Validation body: Body that performs validations of GHG claims under ISO 14064-3 and ISO 14065.</p> <p>Verification body: Body that performs verifications of GHG claims under ISO 14064- 3 and ISO 14065.</p> <p>As can be seen from the definitions, Validation and Verification Bodies are Conformity Assessment Bodies (CABs).</p>
2	Section 1.2 (page 10) and 3 (page 11)	In the Background section, it is stated that "the PROCLIMA Program is formed to certify and register initiatives." This statement does not consider that certification is an exclusive activity of the regulated market, being PROCLIMA an entity of the voluntary market and therefore without the power to certify. In this sense, the carbon standard issues are offset based on the validation and verification opinions provided by the OVV, such offsets being VERs and not CERS. The CERs come from the CDM. The same claim is outlined in section 3 (Scope). Throughout the document, there is talk of certification, which is not relevant in the	<p>The ProClima Program is NOT a "voluntary market entity."</p> <p>ProClima defines rules and procedures (contained in the certification program and standards) so that certified and registered projects can participate in both voluntary markets and regulated (or mandatory) markets. The destination of the Verified Carbon Credits (by type of market) is determined by specific conditions concerning retroactivity, for example. Additionally, the project owners are the ones who decide in which market niche they offer their CCV.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
		<p>voluntary market. Voluntary mechanisms generate verified GHG emission reductions and removals (VERs)</p> <p>Conceptual interpretation</p>	<p>Certification is NOT "an exclusive activity of the regulated market." According to the definitions established in international standards:</p> <p>Certification. third party attestation relating to a conformity assessment object, except for accreditation (ISO / IEC 17000: 2020 (en))</p> <p>Attestation. Based on a decision, the issuance of a statement that compliance with the specified requirements (ISO / IEC 17000: 2020 (en)) has been demonstrated.</p> <p>Certification body. Third-party conformity assessment body that operates certification schemes. Note 1 to entry: A certification body can be governmental or non-governmental (with or without regulatory authority). (ISO / IEC 17065: 2012 (en))</p> <p>Third-party conformity assessment activity. Conformity assessment activity carried out by a person or organization independent of the supplier of the conformity assessment object and has no interest as a user in the certification object.</p> <p>Certification scheme. The system applied to specific products, to which the exact specified requirements, specific rules, and procedures apply.</p> <p>Within the framework of the processes in the standard, ProClima DOES NOT "issue offsets." Under the ProClima registration system, Verified Carbon Credits (CCV) are issued. However, it does not issue VERs (Verified Emission Reductions), which correspond to the unit of carbon credits issued by the Verified Carbon Standard (<a href="https://verra.org/project/vcs-program/">https://verra.org/project/vcs-program/</a>). Nor CERs, Certified Emission Reductions of the Clean Development Mechanism (<a href="https://cdm.unfccc.int/">https://cdm.unfccc.int/</a>).</p> <p>Likewise, the statement "Voluntary mechanisms generate Verified GHG emission reductions and removals (VERs)" is unfounded.</p> <p>On the other hand, although ProClima is not the object of accreditation (or something similar), the National Accreditation Body (ONAC), after a complete and exhaustive review of our procedures; By email dated October 2, 2020 (signed by Julieth Villarraga Farfán. Research and Projects Coordinator) expresses the following: "Thank you for the detail of the information you provide us, this has allowed us to complete the suitability analysis for the ProClima Program. "</p> <p>Regarding "Conceptual interpretation." The terms and concepts are clear and precise, and they do not allow for a conceptual interpretation.</p> <p>Finally, the definition contained in Resolution 1447 of 2018 (Article 3. Definitions) is transcribed here: "GHG certification programs or carbon standards. They are voluntary or mandatory, international or national systems or schemes with a set of principles and requirements for the formulation, development, validation, and verification of the results regarding the design and implementation of GHG mitigation initiatives."</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
3	Section 3 (pg. 11)	It is indicated that the GHGs included as admissible in projects are CO <sub>2</sub> , CH <sub>4</sub> , and N <sub>2</sub> O. This prescribes that mitigation initiatives generating mitigation actions with other types of GHG (ex. HCFC, HF, SF <sub>6</sub> ) will not be admitted.	This is how ProClima defines it. Activities that generate reductions in emissions of other GHGs, other than those included in the scope of the Certification Program, cannot be certified by ProClima.
4	Section 3 (pg. 16)	An allusion is made to the 2019 versions of the NTC- ISO 14064-1, -2, and -3 standards; it is not clear if the previous versions of the document CERTIFICATION AND REGISTRATION PROGRAM OF GHG MITIGATION INITIATIVES AND OTHER EFFECT GAS PROJECTS GREENHOUSE refer to the same version and if the OVV's that have been accredited in the NT-ISO 14064-1, -2 and -3 2006 version is included, there is a transition plan. OVV's accredited by ONAC are accredited in the 2006 version of the 14064 standards.	<p>All previous versions have been submitted to public consultation. In addition, they have been published on the ProClima website. Finally, they have been sent by email to all interested parties, including MADS.</p> <p>In section 3 (pg. 11-12) of the document version in consultation, no reference is made to these standards.</p> <p>However, it is clarified that whenever the reference to a Standard appears, "or the one that updates it" is included. This means that the latest version of the normative references, which apply to each case, must always be complied with.</p> <p>Additionally, everything related to the requirements that Conformity Assessment Bodies must meet is defined in the Validation and Verification Manual.</p>
5		No mention is made of Resolution 0831 of 2020	<p>In Section 7 (Normative References):</p> <p>(d) Resolution 1447 of 2018. By which the system of monitoring, reporting, and verification of mitigation actions at the national level referred to in article 175 of Law 1753 of 2015 is regulated., and other provisions are issued (Ministry of the Environment and Sustainable Development), or the one that modifies or updates it, when applicable;</p> <p>Therefore, since Resolution 0831 of 2020, "By which Resolution 1447 of 2018 is modified, and other determinations are made" is contemplated and, with "the one that modifies or updates it," is "mentioned."</p>
6	Section 8 (pg. 17)	The first paragraph refers only to the AFOLU, transport, energy, and waste sectors. However, REDD + is not considered as a separate typology to mention.	The AFOLU Sector (Agriculture, Forestry and Other Land Uses) includes Reducing Emissions due to Deforestation, Degradation and forest conservation, sustainable management or improvement of carbon stocks in forests (REDD + ).
7	Section 9.1.1 – d (pg. 20)	It does not include other types of initiatives in the transport sector. It is limited only to NGV	For now, ProClima only considers GHG mitigation initiatives that include the conversion of cars to Natural Gas Vehicles (NGV).
8	Section 9.1.1 – e (pg. 20)	When referring to CDM methodologies, the tools that are part of them should also be applied.	<p>This is provided in section 10.4 (Use of appropriate methodologies):</p> <p>In the energy and waste sectors, the other greenhouse gas projects must apply methodologies approved by the Executive Board of the Clean Development Mechanism, including the rules and procedures, the concepts, definitions, methodological tools, etc., that apply to CDM projects.</p>



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9	Section 9.1.3 (pg. 22)	Energy projects (wind and solar) and energy efficiency are already among the listings in Section 9.1.1. The same happens with Sections d and e in that section 9.1.3. If they refer to the other projects being those implemented outside the national territory, this is not explicit in Section 9.1.3.	The title in this Section is 9.1.3 Other greenhouse gas projects
10	Section 9.1.3 (pg. 22)	From the list of other projects (9.1.3), the only one that is not eligible for Non-causation (Decree 926) are those implemented outside the national territory assuming compliance with the other requirements of Decrees 926 and 446 and Resolutions 1447 and 831. Therefore, from this way, the penultimate paragraph would be false because it would exclude projects of type b and f from that Section 9.1.3.	<p>The following statement is confusing: "the only ones that are not eligible for Non-causation (Decree 926) are those implemented outside the national territory assuming compliance with the other requirements of Decrees 926 and 446 and Resolutions 1447 and 831."</p> <p>Does this refer to the assumption for these projects' "compliance with the other requirements of Decree 926 and Resolutions 1447 and 831"? This is precisely the most significant difference between this type of project and GHG mitigation initiatives. The other GHG projects must not comply with the regulations outlined in Colombian legislation.</p> <p>Section 9.1.3 establishes the requirements that, in general terms, other greenhouse gas projects must meet to be certified with ProClima.</p> <p>On the other hand, claiming that "a paragraph is false" due to misinterpretation is inappropriate.</p>
11	Section 10.2. (pg. 23)	I suggest clarifying the second paragraph, since it refers to other GHG projects and, although it is clarified in parentheses, they may be referring to the typology referred to in Section 9.1.3, which, it seems, would only be for international projects (although this is not clear in writing either).	<p>Therefore, what is defined in the second paragraph of section 10.2 makes specific reference to this type of project:</p> <p><b>The other GHG projects (in sectors other than AFOLU) are subdivided into large-scale and small-scale, according to the Mechanism's definitions of Clean Development.</b></p>
12	Section: 10.2 (pg. 23)	Although clarity is given regarding the scale range regarding CDM, the classification is not punctually described. Additionally, it is not clear that following the CDM framework, it is implicitly prescribed that the methodological component of quantifying reductions must follow the logic of small and large-scale methodologies as appropriate. The general wording of section 10.2 is not precise. In addition, it is not aligned with the project types described in the previous Section.	<p>This is provided in section 10.4 (Use of appropriate methodologies):</p> <p>In the energy and waste sectors, the other greenhouse gas projects must apply methodologies approved by the Executive Board of the Clean Development Mechanism, including the rules and procedures, the concepts, definitions, methodological tools, etc., that apply to CDM projects.</p>

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13	Section 10.3 (pg. 23 and 24)	Sections c and d are repeated.	<p>Section 10.3 Quantification periods of GHG emission reductions or removals</p> <p>(c) for sectoral mitigation projects in the energy and waste sectors, the rules for the crediting period defined by the Clean Development Mechanism apply. That is, a maximum of seven years, renewable a maximum of two times or a maximum of ten years without the option of renewal,</p> <p>(d) for the other greenhouse gas projects, the rules for the crediting period defined by the Clean Development Mechanism apply in the energy and waste sectors. In other words, a maximum of seven years, renewable a maximum of two times or a maximum of ten years without the option of renewal.</p> <p>They are not "repeated." For example, letter (c) is the rule for sectoral mitigation projects, and Letter (d) is the rule for other greenhouse gas projects. Although they seem "repeated," it is preferred to differentiate between clarifying what both project types must comply with as it is the same rule.</p>
14	Section 10.4 (pg. 24)	In this Section, it is mentioned that it is possible to use methodologies approved by PROCLIMA; throughout the document, the criteria for the approval of the methodology or the procedure for this purpose are not described, and compliance with the methodology with the provisions of the normative.	<p>Section 10.4 (Use of appropriate methodologies) provides the following:</p> <p>Sectoral GHG mitigation projects and other GHG projects based on GHG removal activities, REDD + projects, and projects in the transportation sector must apply methodologies developed by PROCLIMA. These should be used in their entirety, including the complete application of the methodological guides referred to in the methodology, if any.</p> <p>To obtain the certification of GHG mitigation initiatives and other GHG projects under this Program, the holders of GHG initiatives and projects may also use another methodology and/or tool, as long as these apply to the GHG mitigation initiative and are approved by PROCLIMA.</p> <p>The procedure for the approval of methodologies by the ProClima Technical Committee is described in the document called Briefing Document.</p>
15		In the same way, the use of methodological tools such as additionality or baseline tools (for example) which are regularly used in the CDM environment and indicated in the methodologies, is not declared as mandatory.	<p>Section 10.4 Use of appropriate methodologies, paragraph 3 (page 24)</p> <p>In the energy and waste sectors, the other greenhouse gas projects must apply methodologies approved by the Executive Board of the Clean Development Mechanism, including the rules and procedures, the concepts, definitions, methodological tools, among others., that apply to CDM projects.</p> <p>In addition, sections 11.3.1 and 12 make specific references to the fulfillment of this requirement.</p> <p>The requirements related to the design, monitoring, validation, and verification that other GHG projects in the energy and waste sectors must meet those established by the Clean Development Mechanism, including definitions, methodologies, methodological tools.</p>

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			<p>Projects in the AFOLU sector must comply with what is described in this Program and with the national laws applicable to project activities.</p> <p>On the other hand, the other documents that complete the ProClima Standard present procedures related to this aspect.</p>
16	Section 10.4 (pg. 24)	What is understood by methodologies and/or tools approved by Proclima?	<p>Methodologies and tools that the ProClima technical committee has evaluated and that comply with all the provisions of the Certification Program and the other documents that make up the Proclima standard—always bearing in mind compliance with the principles of the Program and technical considerations that demonstrate rigor and transparency.</p> <p>Methodologies and/or tools approved by Proclima are publicly disclosed on the web page of ProClima.</p>
17	Section 10.6 (pg. 26)	The Section does not describe the guidelines of Resolution 1447 regarding the obligation to use methodological assumptions aligned with, for example, INGEI	<p>Section 10.6 Baseline or baseline scenario</p> <p>The holders of GHG mitigation initiatives and other GHG projects must establish a baseline or baseline scenario, that is, the scenario that represents the GHG emissions, which would occur in the absence of GHG mitigation activity, so that they comply with the provisions of the methodology applicable to the initiative or project.</p> <p>The specific requirements are described in the methodologies, for example:</p> <p>PROCLIMA. 2020. METHODOLOGICAL DOCUMENT SECTOR AFOLU. Quantification of GHG Emission Reductions from REDD + Projects. Version 2.2. February 5, 2021. 63 p. Bogota Colombia. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p> <p>PROCLIMA. 2020. METHODOLOGICAL DOCUMENT. AFOLU SECTOR. Quantification of GHG Emission Reductions or Removals from Sectoral Mitigation Projects. GHG removal activities. Version 2.2. October 19, 2020. Bogotá, Colombia. 61 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p> <p>However, in section 11.4.1 Sectoral GHG mitigation projects (and in other sections of the document), the following is stated:</p> <p>The owner of the sectoral mitigation project must build the baseline scenario of the initiative, keeping consistency with the emission factors, activity data, projection variables of GHG emissions, and the other parameters used for the construction of said scenario, under the applied methodology and ensuring that the identification of the baseline of the project does not lead to an overestimation of the mitigation results of the same, concerning the national information.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
18	Section 10.5 (pg. 26)	<p>Given that no uncertainty will be equal to zero, even when the data and parameters used to calculate mitigation results are consistent with the inGEI and reference scenarios, it is a requirement for all standard methodologies and programs that include forestry activities to count with mechanisms for managing the risk of leaks and non-permanence of GHG reductions or removals and for managing uncertainty. Otherwise, these results are not countable and cannot be eligible for payments for results or similar compensation from August 2019. The preceding, under paragraph 2 of article 34 of Resolution 1447 of 2018.</p> <p>This observation is made for the phrase "it will not be necessary to apply the percentages, defined for the discount factor in the guidelines for managing uncertainty," understanding these percentages as the untradable buffer in markets intended to leak risk management mechanism and not permanence.</p>	<p>Section 10.5 Conservative approach and management of uncertainty:</p> <p>According to the International Organization for Standardization (ISO), "uncertainty is the parameter associated with the result of the quantification, which characterizes the dispersion of the values that could reasonably be attributed to the quantified amount. Thus, uncertainty information generally specifies quantitative estimates of the likely dispersion of values, and a qualitative description of the probable causes of the dispersion" (Source: ISO 14064-2: 2019 (sp)).</p> <p>Consequently, it is imprecise to relate uncertainty to "having mechanisms for managing the risk of leaks and non-permanence of GHG reductions or removals and for managing uncertainty."</p> <p>For its part, MADS, in Article 34 of Resolution 1447 of 2018 (Paragraph 2), states the following:</p> <p>Sectoral mitigation projects that include forestry activities must use methodologies that define a mechanism for managing the risk of leaks and non-permanence of GHG emission reductions and removals and for the management of uncertainty in the quantification of the baseline and mitigation results; Likewise, it must evaluate and demonstrate the relevance of the activities to be carried out for the suitability of the soil in the project implementation area.</p> <p>Uncertainty is not related to leakage and non-permanence. It is a concept associated only with quantifying the reduction/removal of GHG emissions for eligible project activity.</p> <p>Regarding the phrase indicated by the MADS in its comment: "it will not be necessary to apply the percentages, defined for the discount factor in the guidelines for managing uncertainty," understanding these percentages as the untradeable buffer in markets that it is intended to be a mechanism for managing the risk of leaks and non-permanence, "it is necessary to confirm that the uncertainty is not addressed with the reserve considered in the ProClima registry system. This reserve is defined as a measure linked only to the risk of non-permanence.</p> <p>On the other hand, it is reaffirmed that the methodologies developed by ProClima (for the AFOLU sector) fully consider the aspects related to the management of uncertainty and leakage. See for example:</p> <p>PROCLIMA. 2020. METHODOLOGICAL DOCUMENT SECTOR AFOLU. Quantification of GHG Emission Reductions from REDD + Projects. Version 2.2. February 5, 2021. 63 p. Bogota Colombia. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p> <p>PROCLIMA. 2020. METHODOLOGICAL DOCUMENT. AFOLU SECTOR. Quantification of GHG Emission Reductions or Removals from Sectoral Mitigation Projects. GHG removal activities. Version 2.2. October 19, 2020. Bogotá, Colombia. 61 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p>

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19	Section 10.7 (pg. 27)	<p>The fundamental purpose of storing in differentiated accounts a percentage of the quantified removals is to ensure permanence. By releasing the retained credits in the following verification period, the purpose of the retention is wholly lost, generating a loss in the guarantee of permanence. Furthermore, different carbon standards only release the retained removals once the period of execution of the activities has concluded; the document's proposal undermines the capacity of the standard (and the methodology) to promote conditions of permanence.</p>	<p>The comment is confusing and incomplete. However, understanding its idea, the following is pointed out:</p> <p>Permanence is not ensured by "storing in differentiated accounts a percentage of quantified removals." Instead, permanence is ensured through instruments such as:</p> <ul style="list-style-type: none"> <li>. Compliance with current regulations</li> <li>. Ensuring an orderly assessment of carbon rights</li> <li>. A thorough and comprehensive evaluation of land use rights</li> <li>. Appropriate, rigorous, and accurate estimation of GHG reductions/removals, demonstrating that there is no room for over-estimation (through the appropriate use of relevant data and parameters)</li> <li>. Proper long-term risk management</li> <li>. The criteria determined to evaluate the quantification of GHG reductions/removals</li> <li>. Quality in the validation, verification, and certification processes</li> <li>. The rigor and exigency during the registration process and the issuance of Verified Carbon Credits</li> </ul> <p>The 15% reserve is a measure designed to address risk management.</p> <p>The critical aspect is precisely what the MADS indicates "Different carbon standards release the retained removals once the period of execution of the activities has concluded." This confirms that the permanence is not affected by the release of the CCV <b>in a subsequent verification</b> "as long as there has been no cancellation of such credits," as proposed by ProClima.</p> <p>In documents such as FCCC / SBSTA / 2003/5 and FCCC / SBSTA / 2003 / L.13, some of the options raised for the management of non-permanence can be examined. For example, the CDM adopted tCERs as a measure to manage this aspect.</p> <p>Taking into account the previous considerations, there is no basis, neither conceptual nor technical, to take into account the following statement: "the document's proposal undermines the capacity of the standard (and the methodology) to promote conditions of permanence and promotes." Accordingly, MADS is requested to avoid making such claims lightly and based on misinterpretations of the concepts and requirements associated with structural issues in carbon markets.</p>
20	Section 10.7 (pg. 27)	<ul style="list-style-type: none"> <li>• Under what criteria the VVBs will evaluate the permanence of the project activities?</li> <li>• The purpose of discounting and maintaining a reserve is precisely</li> </ul>	<p>As for "Under what criteria ...."? The activities to be carried out by the VVB must take into account what is described in the document: PROCLIMA. 2021. Validation and Verification</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
		intended to reduce the risk of leaks and non-permanence. However, they can be released in each verification period is nonsense, putting the initiative's very addition and results at risk. Therefore, it should be checked that the minimum is reserved for the credit period.	<p>Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p> <p>Additionally, the accredited validation and verification bodies demonstrate the suitability and competence for developing their validation and verification activities. This, employing its verification methods.</p> <p>For the comment about the reserve, please see the previous response.</p> <p>On the other hand, non-permanence is an entirely different concept and alien to the additionality considerations of GHG project activities. Therefore, the phrase "but the fact that they can be released in each verification period is an absurdity that puts at risk the very additionality of the initiative and its results. It should be checked that the minimum is reserved for the credit period" does not have technical validity.</p> <p>In the Certification Program and the ProClima standards framework, no "credit period" is defined; they are called quantification periods of GHG reductions/removals.</p> <p>In addition, it is worth clarifying that the issue of additionality is fully addressed, both by the certification program and ProClima methodologies. This despite the general definition of additionality contained in Resolution 1447 of 2018.</p> <p>To affirm that "it is nonsense" lacks any foundation.</p>
21	Section 10.8 (pg. 27 and 28)	The mitigation results must also be governed by Resolutions 1447 of 2018 and 831 of 2020, in addition to what is related in this Section.	<p>Section 10.8 Mitigation Results provides the following:</p> <p>GHG mitigation initiatives and other greenhouse gas projects must demonstrate their mitigation results within the framework of meeting national climate change goals established under the UNFCCC and/or the one that dictates binding norms in this regard.</p> <p>Likewise, they must guarantee that the GHG mitigation results obtained due to their implementation are verifiable within the framework of ISO 14064-3: 2019 or the one that updates it.</p> <p>Therefore, the mitigation results are "also governed by Resolutions 1447 of 2018 and 831 of 2020". Review the part in the text that indicates: within the framework of compliance with the national climate change goals established under the UNFCCC and/or the one that dictates binding regulations in this regard.</p>
22	Section 10.8 (pg. 28)	Resolution 1447 is not mentioned as the primary framework for mitigation results	See response to the previous comment

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
23	Section 10.10 (pg. 28)	Carbon is not for sale. Emission reduction certificates (or, in the case of Proclima, CCVs) are sold. (paragraph 1) The document must be explicit in terms of the process of "free, prior and informed consent" of the communities; it does not indicate who should give that consent and does not leave a possibility of distributing benefits (paragraph 2) and safeguards compliance.	<p>The text related to "carbon is not for sale" was adjusted. The text has been changed to "the sale of carbon credits."</p> <p>The Section mentioned above describes everything related to carbon rights and what the holders of GHG mitigation initiatives must comply with to ensure that everything related to this issue is met. As for not being explicit in terms of "the process of free, prior, and informed consent," the paragraphs that follow relate to these issues.</p> <p>It is not necessary to repeat in the standards everything that the law dictates or applies to the procedures with binding effect, as reference indicates what applies in each case.</p>
24	Section 10.10 (pg. 29)	The method or procedure for PROCLIMA to verify the exposed conditions is not precise. Similarly, it is not clear what the implications of non-compliance with the requirements have.	<p>In the framework of the certification and registration of GHG mitigation initiatives and other greenhouse gas projects, it is a condition that whoever carries out the conformity assessment is a validation and verification body. Therefore, it is not the responsibility of ProClima to "verify the conditions set forth." ProClima defines procedures (See, for example, the Validation and Verification Manual).</p> <p>It is evident that, as the Certification and Registration Program for GHG mitigation initiatives and other greenhouse gas projects, ProClima provides the requirements that must be met by the holders of the initiatives and projects, "non-compliance with the requirements" would lead in the first place that the validation and verification body does not issue a Validation and/or Verification Statement declaring that the owner of the initiative or project complies with all the requirements. Therefore, the project would not be certified by ProClima.</p>
25	Section 10.14 (pg. 33)	The description of the monitoring activities is not prescribed for the parameters to be monitored, such as the frequency of monitoring, the degree of precision of the measuring equipment, conditions usually described in the methodological component.	<p><b>Precisely</b>, these are "conditions normally described in the methodological component." Consequently, all these aspects are contemplated in the methodological documents developed and/or approved by ProClima.</p> <p>Additionally, section 10.4 defines requirements on the use of appropriate methodologies, which includes these elements.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
26		<p>In the same way, it is indicated that there may be modifications in the monitoring plan and that such modifications will be evaluated in the subsequent verification period; however, the consultation and approval procedure of PROCLIMA regarding modifications to the monitoring plan is not specified, which implies that projects can make modifications to their monitoring plans at will without the carbon standard having control over the relevance and implications of the plan changes in determining GHG reductions or removals.</p>	<p>Again, it is not ProClima who must evaluate the modifications to the monitoring plan. Therefore, it is entirely inappropriate to state that "projects can make modifications to their monitoring plans at will without the standard having control over the relevance and implications of the plan changes in determining GHG reductions or removals."</p> <p>In this sense, on pages 34 and 35 of the document (object of consultation), the following is stated:</p> <p>The GHG mitigation initiatives and other GHG projects must execute the monitoring plan validated by the OEC. Therefore, the execution of the validated monitoring plan and, if necessary, its modifications will be a requirement for verification. During the verification process, the initiative and project owners must submit the report following the monitoring plan. In addition, any revisions to the monitoring plan to increase its accuracy and/or the completeness of the information must be justified and submitted to the OEC.</p> <p>The OEC will determine that these have been calculated according to the methodology used by the holder of the GHG mitigation initiative, based on the execution of the monitoring plan and the evaluation of GHG reductions or removals and the baseline scenario.</p> <p>Consequently, the inconsistencies in the comment correspond to an incomplete interpretation of the concepts in the document being consulted.</p>
27	Section 10.14 (pg. 34)	Should it be validated again to proceed with the verifications to modify the validated monitoring plan?	<p>See comment # 26 (above). Additionally, the document may be consulted/ revised:</p> <p>PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p>
28	Section 10.16 (pg. 36)	<p>According to the Section, the inclusion of new areas does not require the validation of the baseline. However, it is not indicated what course of action should be followed if the new areas included are not eligible from the non-demonstration of additionality or baseline (10.16.1 -fy h-). In different standards where the grouping of projects is allowed, each added component is an object of validation and therefore registered as part of a project, including an additionality and baseline assessment. It is not prescribed that the entry of new projects must follow the logic of project scales according to the amount of reductions/removals expected.</p>	<p>The text in section 10.16 states that projects that can be expanded without a new validation of the project description can be expanded.</p> <p>This clarifies the fact that what should not be validated again is the description of the project. However, literals (a) to (j) in section 10.16 describe everything related to the project limits, the applied methodology, the quantification of reductions/removals, activities, baseline, starting date of the project, additionality, etc.</p> <p>Then, the suggestion of supposedly adopting "n different standards where the grouping of projects is allowed, each added component is capable of being validated and therefore registered as part of a project, including an additionality and baseline assessment" does not apply. ProClima has all the requirements defined for grouped projects.</p> <p>The last sentence in the comment, "It is not prescribed that the entry of new projects must follow the logic of project scales according to the amount of reductions/removals expected," is</p>



N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
			imprecise and inconsistent. First of all, "new projects" do not enter under the framework of grouped projects. The rest is a confusing and irrelevant idea.
29	Section 11.1 (pg. 38)	It is indicated that the CDM criteria will be used for the starting date. However, the criteria must be described in the document even though they are taken from a certification program. Furthermore, since it does not include, at least, a link to consult the criteria, these must be defined for the reader's consultation and not simply mention that they are from MDL. This consideration applies to any reference to CDM that is made within the framework of PROCLIMA's requirements.	Development Mechanism only refers to certain types of projects, not all of them. Regarding "Since at least one link is not included ...", the following link to the CDM page is included in a footnote: <a href="https://cdm.unfccc.int/">https://cdm.unfccc.int/</a>
30		It is not clear why five years before completing the validation is taken as a maximum period of the start date, especially what implications this 5-year period has in criteria such as additionality or eligibility in the AFOLU case. Consequently, it is indicated that the retroactivity of the start date compared to the validation date for sectoral mitigation projects is described in the methodological component. Does this mean that there are different retroactivity periods according to the type of mitigation initiative? What justification is there for having different retroactive periods?	<p>The certifiers or standards have the competence and power to decide on the retroactivity of the projects that intend to be certified and registered under the standard rules.</p> <p>Additionality or eligibility in the AFOLU case is effectively associated with these periods defined by the Program. What is the main idea of the MADS comment? Accordingly, additionality and eligibility are negatively affected by the definition of maximum retroactive periods?</p> <p>The technical justifications are clearly described throughout the document and the other documents that complement the ProClima Program.</p>
31	Section 11.3.1 (pg. 39)	It is not clear how the relevance of the activities to be carried out regarding the aptitude for land use should be evaluated and demonstrated (method) and what is the criterion to determine said aptitude for the use of the land	<p>It is not the responsibility of the Program to describe the complete methodology for all applicable criteria. It is assumed that the holders of mitigation initiatives and other GHG projects manage the models and methods to demonstrate compliance with the program requirements. On the other hand, there is the competence of the validation and verification bodies to determine if the requirement is met, applying appropriate methods and models.</p> <p>However, it is possible to foresee that the methods related to this are associated with regional and national zoning, linked to geographic information systems and official cartography.</p>
32	Section 11.4.2 (pg. 40)	The Section does not clarify the use of the PMM and NREF figures following Resolution 1447 and the date of validation. It also lacks a definition relevant to the validation date. There are no allusions throughout the document related to the PMM, only to the NREF	<p>In this regard, the text states the following:</p> <p>To verify GHG emission reductions and removals generated from January 2020 onwards, the REDD + Project holder who has previously validated its baseline must adjust and validate its baseline from the most updated NREF. The adjustment of the baseline consists of the methodological reconstruction of the most updated NREF applicable to the project on the geographical area of the project.</p> <p>Section 14.1 (e) stated that the VVB must evaluate what is related to the maximum mitigation potential.</p> <p>However, it is pertinent to clarify that NREF and PMM are contemplated in the ProClima methodological document for REDD + projects.</p>

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33	Section 11.5.1 (pg. 39)  Section 11.5.2 (pg. 41)	There is an explicit citation of Resolution 1447 without mentioning it.	Footnotes are included
34	Section 11.3.1 (pg. 40)	What information or criteria of the pertinence of the activities to be developed regarding the soil suitability of the project implementation area should be evaluated and demonstrated?	It is suggested to review the methodological document.
35	Section 11.5 (pg. 41)	The Section does not prescribe that the additionality criteria described in Resolution 1447 complement the additionality criteria described in different methodological components. Similarly, it does not prescribe that when the methodologies refer to, for example, specific additionality tools, they must be used as an integral part of the methodology.	<p>The text in section 11.5 indicates the following:</p> <p>Additionality considerations and details about its demonstration are detailed in PROCLIMA's methodological documents. In general terms, the description is presented below the sections of reference.</p> <p>Therefore, it is suggested to review the methodological documents of ProClima, where all the requirements related to additionality are thoroughly described.</p> <p>It is worth clarifying that these do not contemplate the definition of additionality in Resolution 1447. What is established in such a resolution is a generic definition of additionality.</p>
36	Section 11.5.1 (pg. 41)	If you prefer not to cite article 37 of resolution 1447, you should refer.	<p>The footnote is included.</p> <p>Take into account that at the beginning of section 11.5, it is stated: <u>in general terms</u>.</p>
37	Section 11.5.2 (pg. 41)	If you prefer not to cite article 43 of resolution 1447, you should refer.	<p>The footnote is included.</p> <p>Take into account that at the beginning of section 11.5, it is stated: in general terms.</p>
38	Section 11.6 (pg. 41 and 42)	The demonstration of safeguards is prescribed without providing elements of how the demonstration of compliance is made	It is suggested to review the methodological document.
39	Section 11.8 (pg. 39)	RENARE is ready to register GHG mitigation initiatives at present.	<p>According to the statement issued by the Ministry of Environment and Sustainable Development. MADS., Dated December 06, 2020. Signed by the Director of Climate Change and Risk Management, José Francisco Charry Ruiz:</p> <p><i>"Due to the above, we allow ourselves to clarify that the official communication addressed in the fourth article of Resolution 831 of 2020 and which refers to the commissioning of RENARE has not been issued. Therefore, three (3) months for reporting and updating the information of the initiatives in RENARE and the registration in RENARE of the cancellations provided for non-causation during the transition regime established in the paragraph of article four of Decree 926 of 2017 has not started."</i></p> <p>We understand that such "official communication" has not been issued. However, if ProClima is misinformed, MADS will be asked for clarification</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
40	Section 11.8 (pg. 45)	RENARE is available and in operation.	See response to comment # 39 (above).
41	Section 13.1 (pg. 47)	It should be clarified if the category (13.1.1 to 13.1.) It is obtained when all the components are demonstrated or when at least one of them is demonstrated.	In illustrations 1, 2, and 3 of the document, the conditions that must be met, as a minimum, to obtain each category are presented
42	Section 13.1.4 (pg. 49)	<p>Section a of the components to demonstrate for the adaptation category is very ambiguous and does not necessarily point to adaptation. Perhaps the most appropriate instrument could be the PNACC. Therefore, it is necessary to refer to the National Plan for adaptation to climate change, the goals of the NDC in the adaptation component.</p> <p>It should be mentioned that the initiative must aim at reducing vulnerability and/or increasing adaptive capacity to specific threats related to climate change scenarios.</p> <p>It cannot be said that activities such as silvopastoral systems or other types of measures respond to adaptation to climate change; these measures respond as long as they have been developed by identifying climate change scenarios, vulnerability analysis, and identifying what type of threat they respond to.</p>	<p>The Section indicates, "such as." These options are presented as a guide or reference. Clearly, during the validation and verification process, the conformity assessment body must assess the activity's relevance and justification.</p> <p>Silvopastoral systems or other types of measures can constitute adaptation measures to climate change appropriately and with activities related to adaptation. FAO, for example, provides information on this particular topic.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
43	Section 14 (pg. 54 to 58)	<p>It is not explicitly stated that VVBs (OEC in the document) must be accredited in standard 14065. In the same way, throughout the document, OEC is spoken of, while national regulations define them as VVB.</p> <p>It is prescribed that when evaluating the material discrepancy, the ISO standards should be taken into consideration; however, Resolution 1447 is evident in indicating that the material discrepancy should not be more significant than 5%.</p> <p>Section 14.1 indicates that the VVB may reject the mitigation initiative, which is imprecise. The VVB declares conformity or non-conformity (compliance or non-compliance), non-acceptance, or rejection of the initiative in the carbon standard. It is not the procedure and criteria for the renewal of the mitigation activities period (7 years renewable).</p> <p>Regarding the verification, section 14.2 indicates that the verification must account for "any significant change in the procedures or criteria of the project since the last reporting period or since the validation," if this is understood as a post- registry (standard in projects, for example in the CDM environment), it is not indicated that criteria and procedures are administered from PROCLIMA to make changes in the validated conditions of mitigation initiatives, which is why the VVB does not have a set of requirements / defined criteria to carry out the verification activity in scenarios where the mitigation initiatives present changes in the geographical, methodological or implementation components.</p> <p>It is not clearly defined that mitigation initiatives may not report for more than three consecutive periods that have not obtained mitigation results (Art. 14 and 15), prescribing the verification periods.</p> <p>It is not clear whether or not PROCLIMA can make observations request clarifications, or similar regarding the declaration of the VVB. This would imply that there is no internal review process or procedure to determine whether or not the declaration of the VVB is in line with the criteria. carbon standard</p>	<p>See response to comment # 1 (above).</p> <p>It is suggested to read both the methodological documents and the validation and verification manual. The aspects mentioned in the comment are detailed.</p>
44	Section 14 (pg. 54)	<p>It should be made explicit in the first paragraph that OECs (VVBs) must be accredited and reference the applicable standards. In addition, to align the timing for the verification periods with Resolution 1447 of 2018 (articles 14 and 15), these conformity assessment processes should be required at most every three years.</p>	<p>It is suggested to read the Validation and Verification Manual.</p> <p>PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a></p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
45	Section 14.1 (pg. 56) - Section b of the notification of the OVV to the holders	It should be clarified that the determination of conformity or rejection of an initiative in the validation process is not judged solely based on the documentation presented but also by field visits by the audit team.	It is suggested to read the Validation and Verification Manual. PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>
46	Section 14.1 (pg. 56)	It should be clarified that the validation will contain the quantification of the GHG emission reductions and/or removals projected for each accreditation period. Currently, the last paragraph of this Section only indicates that it will contain "the quantification of GHG emission reductions and/or removals."  It is not clear whether, in the renewal of credit periods (in the cases that it applies), validation processes must be carried out again.	It is suggested to read the Validation and Verification Manual. PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>
47	Section 14.2 (pg. 57)	Unlike the Validation section, the verification section only indicates the generality of the criteria against which the mitigation results will be verified. The communication procedure of the standard and the owner is not indicated; the possibilities of non-conformities and the solution of these are not indicated.	It is suggested to read the Validation and Verification Manual. PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>
48	Section 14.3.2 (pg. 58)	The Maximum Mitigation Potential criterion is missing as one of the fundamentals for verifying mitigation results of REDD + initiatives	A term associated with mitigation results. See section 10.8 in the document. There is no specific reference to the PMM, but it is included in the requirement.
49	Section 15 (pg. 60)	The accreditation related in Section a must also be in ISO 14064-2 to validate and verify at the project level. The above and what is clearly stated in terms of the sector to which the mitigation activity belongs in Section b.	ISO14064-1, 14064-2, and 14064-3 define the scope of accreditation. The standard for accreditation is ISO14065.  All the requirements related to conformity assessment bodies, and therefore, to validation and verification bodies are found in detail in the following document: PROCLIMA. 2021. Validation and Verification Manual for GHG Mitigation Initiatives and Other Greenhouse Gas Projects. Version 1.3. April 5, 2021. Bogotá, Colombia. 38 p. <a href="http://www.proclima.net.co">http://www.proclima.net.co</a>
50	Section: 15.1 (pg. 61-62)	The certification activity is exclusive to the Certification Programs, which are part of the well-known regulated market. PROCLIMA is in the sphere of voluntary markets and issues VERs, which are not certified but verified	See response to comment # 2, a complete description of the validity of the activity.  ProClima DOES NOT verify. Verification is the responsibility of the VALIDATION AND VERIFICATION BODIES, who act as Conformity Assessment Bodies.  Again, VERs are issued by the Verified Carbon Standard ( <a href="https://verra.org/project/vcs-program/">https://verra.org/project/vcs-program/</a> )

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51	Section 16 (pg. 62)	<p>Numerals a and b are contradictory</p> <p>It is unclear whether a mitigation initiative migrating from a GHG program (Certification Program or carbon standard) should be subject to a new validation.</p> <p>The condition that the starting date of the mitigation initiative can be more significant than five years is in itself a contradiction. This, given that the concept of the validation date replaces the starting date criterion. Therefore, the starting date should not be replaced by the validation date. This would allow initiatives older than five years (start date) to be registered in the carbon standard.</p>	<p>Numerals a and b are revised and literal (b) is adjusted.</p> <p>Paragraph (d) requires compliance with the rules and procedures established by ProClima. However, it is not intended to carry out a new validation.</p> <p>The starting date criterion is not "replaced by the concept of the validation date." Also, "the starting date is replaced by the validation date."</p> <p>MADS misinterprets what is described in this Section.</p>
52	Section 16 (pg. 62)	<p>Sections a and b may be understood as contradictory. However, it can be clarified by indicating that the mitigation results of an initiative from another standard will be accounted for in Proclima only if they have not been and will not be accounted for and/or traded under the standard from which it comes.</p> <p>If Section b refers to the fact that the initiative must demonstrate that it duly canceled its registration in the standard from which it came, there should be a means of verification (ex.: a letter from the previous standard that verifies it with minimum requirements, the certified results and how many of them were commercialized)</p>	<p>The text regarding the registry cancellation in the standard where it came from is adjusted.</p> <p>The reference to a procedure and/or evidence to demonstrate that it meets the requirement is included</p>
53	Section 16 (pages 62 and 63)	<p>It is not clear if standards transfers require revalidation and under what criteria it will be done.</p>	<p>See response to comment # 51 (above).</p>
54	Section 17 (pg. 63)	<p>Sections e and f are optional since initiatives that have not started activities may not have this documentation yet (until now, they would be in the formulation and validation phase). Therefore, they are only necessary if the initiative is in the implementation period (no longer than allowed).</p>	<p>The summary description on the registration platform does not refer to the phase in which the GHG initiatives or projects are. Instead, this Section lists what, in general, the holder must present to carry out the certification and registration.</p> <p>The relevant documentation will be related to validation or verification processes. Therefore, the documentation uploaded to the platform will be different.</p>
55	Section 17 (pg. 63)	<p>By stating that "they cannot be registered in some other Colombian registry system," this last part of the sentence is so broad that it would be advantageous to indicate how other registry systems the initiative cannot be registered.</p>	<p>Phrase deleted.</p>

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#	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1	10.7 Leaks and non-permanence for GHG removal activities and REDD + projects	<p>I identify with concern the final paragraph where it refers to: "The verified carbon credits placed in the reserve account may be released and placed on the market, in a subsequent verification."</p> <p>The reserves are used to maintain carbon fixation insurance if something happens in the future with the implementation of the GHG project. For this reason, such releases must have a future risk analysis on the plantation, and in general, a minimum reserve value must be kept the same. Therefore, eliminating the reserve may affect the future sustainability of the initiative.</p>	<p>The reserve on Verified Carbon Credits (CCV) corresponds only to a risk management measure.</p> <p>The Program for the certification and registration of GHG mitigation initiatives and other greenhouse gas projects (ProClima Program) considers determining aspects to guarantee permanence.</p> <p>For example, legal and institutional frameworks (and compliance with them) are instruments for minimizing risk.</p> <p>Issues such as project responsibilities, land ownership/tenure rights, carbon rights, and compliance with social and environmental safeguards are ensured.</p> <p>Likewise, a fundamental issue: the rigor, the exigency, and the quality assurance during registration and issuance of the Verified Carbon Credits.</p> <p>The proper development and management of these elements and processes, among others, ensures the viability of carbon projects in the long term.</p> <p>Finally, it is not at all clear that there is a relationship between the CCV reserve and the sustainability of the project. It would appear that such a statement is an ad-hoc statement and not a valid statement.</p>