

METHODOLOGICAL DOCUMENT AFOLU SECTOR. Quantification of GHG emission reduction and removal. Activities that avoid land-use change in continental wetlands.

Process: public consultation

Version: 27/10/2021

The methodological document Quantification of GHG Emission Reductions and Removals. Activities that avoid land use change in continental wetlands has been elaborated with the purpose of guiding actions towards the conservation and restoration of continental wetlands, providing methodological requirements for the project design and monitoring of GHG reduction/removal and biodiversity conservation.

The document was published on the ProClima website (www.proclima.net.co) on September 20, 2021, for comments from stakeholders with a deadline of October 8, 2021.

Additionally, it was sent by email to interested parties (on September 27, 2021), including all the organizations with which ProClima has an alliance or has some participation, such as IETA, the FAO Mountain Partnership, FEDEMADERAS and Asocarbono, among others. Below is the information on the addressees of the communication sent.

Name	Position	Organization	E-mail address
Abraham Korman	Senior Advisor Americas (mining and energy)	Conservacion Internacional	Akorman@conservation.org
Adriana Abondano	Geographic Information System Leader	CO2Cero SAS	sig@co2cero.co
Adriana Lucía Arcos		Corporación Biocomercio Sostenible	alarcos@biocomerciosostenible.org
Alejandra Ospitia M.	Executive Director	National Federation of Woodworking Industries - Fedemaderas	direccion@fedemaderas.org.co
Alexis L. Leroy	Executive Director	Allcot Group	all@allcot.com
Ana Celia Salinas Martín	Subdirector of Ecosystems and Environmental Information	IDEAM	asalinas@ideam.gov.co
Ana Gertrudis Herron	Sustainable Development Management Planning and Performance Professional	Empresas Públicas de Medellín - EPM	ana.herron@epm.com.co
Ana Milena Plata Fajardo	Executive Director	Biofix Consultoría	aplata@biofix.com.co
Andrea Jiménez		Optim Consult	ajimenez@optimconsult.com
Andrés Felipe García	Director of Sectoral Planning and Sustainable Development	Federación Nacional de cultivadores de palma de aceite – FEDEPALMA	afgarcia@fedepalma.org
Andrés Felipe Rodríguez Vásquez	Specialized Professional Directorate of Efficient Use of Soil and Land Adequacy Rural Agricultural and Livestock Planning Unit, UPRA	Ministerio de Agricultura y Desarrollo Rural	andres.rodriguez@upra.gov.co
Andrés Felipe Sierra Morales	Environmental Director	Aures Bajo S.A.S. E.S.P.	asierracpph@gmail.com
Anna Lehmann	Global Climate Policy Director	Wildlife Works	anna@wildlifeworks.com
Amparo Rodríguez León	Forestry Group	IDEAM	arodriguezl@ideam.gov.co
Antonella Sorrentino	Office Assistant	The Mountain Partnership Secretariat / FAO - Forestry Division	Antonella.Sorrentino@fao.org
Asocarbono	Communications	Asocarbono	comunicaciones@asocarbono.org
Astrid Gil Gallego	Forestry Planning Coordinator	Duratex Colombia	astrid.gil@duratex.com.co

METHODOLOGICAL DOCUMENT AFOLU SECTOR. Quantification of GHG emission reduction and removal. Activities that avoid land-use change in continental wetlands.

Process: public consultation

Version: 27/10/2021

Name	Position	Organization	E-mail address
Beatriz Zapata Arbeláez	Senior REDD+ Project Coordinator	South Pole Carbon Asset Management S.A.S.	b.zapata@southpole.com
Consultors Ambientals		Cando Bionergy	candobionergy@outlook.com
Carlos Trujillo	Director	Cercarbono	ctrujillo@cercarbono.com
Clara Ligia Solano	Director	Fundación Natura	csolano@natura.org.co
Cesar Garay	Structuring - Xaverian Water Institute	Universidad Javeriana	cegaray@gmail.com
Christian Dannecker	Colombia Director	South Pole Carbon Asset Management S.A.S.	c.dannecker@southpole.com
Christian Ehrat	Consultant		christian.ehrat@gmail.com
Constantino Hernández	Deputy Director of Environmental Studies	IDEAM	chernandez@ideam.gov.co
Daniel Sanín Llano	Manager	Empresa Reforestadora Pro-Oriente	dsanin@prooriente.com.co
Daniela Herrera Serna	Project Director for the carbon tax in Colombia	South Pole Carbon Asset Management S.A.S.	d.herrera@southpole.com
Diana Carolina Avella Ostos	Value Added Leader	Federación Nacional de cultivadores de palma de aceite – FEDEPALMA	davella@fedepalma.org
Diana Catalina Chaparro	Value Added Analyst	Corporación Centro de Investigación en Palma de Aceite, Cenipalma	dchaparrot@cenipalma.org
Dora Cecilia Robayo	Sectorial assistant	Organismo Nacional de Acreditación	dora.robayo@onac.org.co
Edna Julieth Villarraga Farfán	Research and Projects Coordinator	Organismo Nacional de Acreditación	julieth.villarraga@onac.org.co
Eduardo Uribe-Botero	Director	Optim consult	euribe@optimconsult.com
Eduwin Hincapié Peñaloza	Entrepreneurship Ecosystem Director	Fundación Cataruben	ecoemprende@cataruben.org
Erika Andrea Flórez	Carbon Operator	Terra Commodities S.A.S.	info@terracommodities.net
Erika Lucía Urrego	UT Validation and Verification Professional	Instituto Colombiano de Normas Técnicas y Certificación - Icontec	eurrego@icontec.org
Fabio Arjona Hincapié	Vice President	Consrvacion Internacional	farjona@conservation.org
Federico López	Commercial Director	CO2Cero SAS	federico@co2cero.co
Federico Ortiz Mejía	Director	Terra Commodities S.A.S.	fortiz@terracommodities.net
Fernando Henao Velasco	Sustainable Rural Development Director	Departamento Nacional de Planeación	fhenao@dnp.gov.co
Francisco Bejarano Rodríguez	President	Organización Pajonales S.A.S.	francisco.bejarano@pajonales.com
Francisco Quiroga Zea	Manager	MEDIAMOS F & M S.A.S.	mediamosfym@hotmail.com
Gerardo Ojeda	Professor and Research Associate	Universidad Abierta y a Distancia UNAD Centre de Recerca Ecològica i Aplicacions Forestals CREAF (España)	g.ojeda@creaf.uab.cat
Gustavo Andrade Reginato	Sustainable Development Management	ISA Interconexión Eléctrica S.A. E.S.P.	gandrade@isa.com.co

METHODOLOGICAL DOCUMENT AFOLU SECTOR. Quantification of GHG emission reduction and removal. Activities that avoid land-use change in continental wetlands.

Process: public consultation

Version: 27/10/2021

Name	Position	Organization	E-mail address
Harold Santana Rivera	Núcleo Forestal La Primavera – Kajú Corporation S.A.S.	Organización La Primavera	haroldsantana@proyectosforestales.com
Henry Garay	Director	Corporación Ambiental Empresarial CCB	henry.garay@ccb.org.co
Inés Adriana Pachón Ruiz	Professional Master Agricultural Risk Management Unit	Fondo para el Financiamiento del Sector Agropecuario - FINAGRO	ipachon@finagro.com.co
Inés Cavelier Franco	Deputy Technical Director	Patrimonio Natural	icavelier@patrimonionatural.org.co
Isabel Cristina Giraldo	Sustainable Development Management Planning and Performance Professional	Empresas Públicas de Medellín - EPM	Isabel.Giraldo.Ospina@epm.com.co
Ivette Liliana Ríos	Senior Professional	Fondo para el Financiamiento del Sector Agropecuario - FINAGRO	irios@finagro.com.co
Ivonne Maritza Casallas Martínez	Global Change Group	IDEAM	icasallas@ideam.gov.co
Jaime González Triana	Director of the Commercial and Strategic Management Unit	Federación Nacional de cultivadores de palma de aceite – FEDEPALMA	jgonzalez@fedepalma.org
Javier Darío Aristizábal	Climate Change and Risk Management Directorate	Ministerio de Ambiente y Desarrollo Sostenible	jaristizabal@minambiente.gov.co
Jessica Wade-Murphy de Jiménez	Manager	Atmosphere Alternative	jwm@atmospherealternative.com
Jesús Alberto García Núñez	Processing Program Coordinator - Cenipalma	Corporación Centro de Investigación en Palma de Aceite, Cenipalma	jpgarcia@cenipalma.org
Jesús Rivera	Director	Organización La Primavera	jesusrivera@proyectosforestales.com
Jhoanata Bolívar Cardona	Forestry and Land Use Project Manager - Global	South Pole Carbon Asset Management S.A.S.	j.bolivar@southpole.com
Jordi Cañas		Cando Bionergy	canassala@gmail.com
Jorge Girón Leuro	Director	Visso Consultores SAS	jgiron@vissoconsultores.com
José Francisco Charry Ruiz	Technical Director Climate Change and Risk Management Directorate	Ministerio de Ambiente y Desarrollo Sostenible	jcharry@minambiente.gov.co
José Luis Fuentes	Climate Change Manager	Asociación Española de Normalización y Certificación - AENOR	jfuentes@aenor.com
José Luis Rivera	Operations Director	CO2Cero SAS	jose.rivera@co2cero.co
Juan Andrés López Silva	Director	Carbo Sostenible	jlopezsilva@carbostenible.com
Juan Carlos Cuesta	Senior Partner	Cuesta & Asociados	juancuesta@cuestalawyers.com
Juan David Morales Barco	Project Director	Biofix Consultoría	Proyectos@biofix.com.co
Juan David Mira Martínez	Project Coordinator	South Pole Carbon Asset Management S.A.S.	j.mira@southpole.com
Juan Fernando Patiño Díez	Sustainability Specialist - Jaguar Connection Program Coordinator	ISA Interconexión Eléctrica S.A. E.S.P.	jpatino@isa.com.co
Juliana M. Correa Osorio	Project Coordinator	MGM Innova Consulting	jcorrea@mgminnova.com
Kim Myers		Forest Trends	kmyers@forest-trends.org
Laura María Pirela	Operations and Treasury Coordinator	Allcot Group	lmp@allcot.com

METHODOLOGICAL DOCUMENT AFOLU SECTOR. Quantification of GHG emission reduction and removal. Activities that avoid land-use change in continental wetlands.

Process: public consultation

Version: 27/10/2021

Name	Position	Organization	E-mail address
Leslie L. Durschinger	Founder, Director	Terra Global Capital	leslie.durschinger@terraglobalcapital.com
Lina Sofia Cuenca	Legal Director	Fondo para la Acción Ambiental y la Niñez - Fondo Acción	scuenca@fondoaccion.org
Lorena Franco	Deputy Director	Fundación Natura	Lfranco@natura.org.co
Luis Fernando Jara	Director	Programa Páramos y Bosques	ljara@paramosybosques.org
Luisa Fernanda López		Corporación Biocomercio Sostenible	lflopez@biocomerciosostenible.org
Margarita Pava Medina	Professional in climate change	ECOPETROL	Margarita.pava@ecopetrol.com.co
María Catalina Becerra	Director	CB Consulting	gerencia@cbconsulting.com.co
María Rivera	Forestry Projects	Organización La Primavera	proyectosforestales@proyectosforestales.com
Mauricio Rodríguez Castro	General Director	CO2Cero SAS	mauricio@co2cero.co
Miguel López Delgado	Auditor	Asociación Española de Normalización y Certificación - AENOR	mlopezd@aenor.com
Miguel Rodríguez Melo	Member/Councilor	Departamento Administrativo de Ciencia, Tecnología e Innovación - COLCIENCIAS/ Species Survival Commission UICN	mrodriguezmel@gmail.com
Minerva López	Environmental Scientist - GHG Verifier	Ruby Canyon México	mlopez@rubycanyoneng.com
Natalia Arango Vélez	Executive Director	Fondo para la Acción Ambiental y la Niñez - Fondo Acción	narango@fondoaccion.org
Olga Puentes	Sector Coordinator	Organismo Nacional de Acreditación	olga.puentes@onac.org.co
Paulo Hernández	Natural Capital Area Director	Forestry consulting Group S.A.S.	paulo.hernandez@fcsas.com
Poligrow Colombia SAS		Poligrow Colombia SAS	infocolombia@poligrow.com
Fundación Poligrow		Fundación Poligrow	info@fundacionpoligrow.org
Electrimapiri		Electrimapiri	electrimapiri@electrimapiri.com
Rainforest Alliance	Information	Rainforest Alliance	info@ra.org
Raúl González Mitre	President	Deutsche Certification Body	direccion@deutsche certificationbody.de
Raúl Jaime Hernández	Environment Program Coordinator	Federación Nacional de Cafeteros de Colombia	RaulJaime.Hernandez@cafedecolombia.com
Raúl Mitre		Tuv Nord	rmitre@tuv-nord.com
Ricardo Lopes	Executive Director Latin America	EARTHOOD Services Private Limited ESLP	ricardo.lopes@earthood.in
Ricardo Lopes		Verifit	ricardo@verifit.com.br
Rubén Darío Guerrero Useda	Coordinator of the Integrated Management of Forests and Forest Reserves Group Forest, Biodiversity and Ecosystem Services Division	Ministerio de Ambiente y Desarrollo Sostenible	rdguerrero@minambiente.gov.co

METHODOLOGICAL DOCUMENT AFOLU SECTOR. Quantification of GHG emission reduction and removal. Activities that avoid land-use change in continental wetlands.

Process: public consultation

Version: 27/10/2021

Name	Position	Organization	E-mail address
Sandra Duarte	Manager	Fundación Cataruben	gerencia@cataruben.org
Sandra Giovanna Galán	Project Officer	Fundación Natura	sgalan@natura.org.co
Samantha Abear	Knowledge and Information Consultant	Mountain Partnership Secretariat/FAO - Forestry Division	Samantha.Abear@fao.org
Santiago J. Arango	Technical Manager	Optim Consult	sarango@optimconsult.com
Stephen Scofield	Vice President Business Development	Mullion Group	stephen.socfield@mulliongroup.com
Stephen Donofrio	Director	Forest Trends' Supply Change & Ecosystem Marketplace Initiatives	sdonofrio@ecosystemmarketplace.com
Valeria Enciso Coaña	Project Manager	Mexico2	venciso@mexico2.com.mx
Valeria Hincapié Bohórquez	Sustainability Analyst	ISA Interconexión Eléctrica S.A. E.S.P.	vhincapie@isa.com.co
William Giovanni Laguado	Executive Director	Centro de Investigación en Ecosistemas y Cambio Global, Carbono & Bosques	williamlaguado@carbonoybosques.org
Xiomara Lucía Sanclemente	Leader in Biodiversity, Offsets and Investment 1%.	Ecopetrol	xiomara.sanclemente@ecopetrol.com.co

During the public consultation period, comments and suggestions were received from the South Pole Carbon Asset Management.

As a result of the public consultation process, version 1.0 of the document is presented. Annex A (below) presents the observations, comments or suggestions, and clarifications or adjustments resulting from the process.

ANNEX A. Public consultation

Name **Luis Daniel Hernandez Rodriguez**
 Position **Project Manager – Forestry and Land Use**
 Organization **South Pole Carbon Asset Management S.A.S.**
 E-mail address **l.hernandez@southpole.com**
 Date **File received by e-mail the October 8, 2021**

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
1	4. Scope	<p>“This methodology is applicable only for GHG mitigation projects that generate GHG emission reductions/removals, through activities that avoid land-use change, and those that opt for restoration activities that generate GHG removals, in ecosystems of continental wetlands.”</p>	
		<ul style="list-style-type: none"> The methodology for the delimitation of continental wetlands referenced in the document is based on wetland ecosystems in Colombia. In this sense, what would be the geographic range of applicability of this methodology, only for Colombia? 	<p>Adjusted The methodology is proposed to the Orinoquia Region.</p>
		<ul style="list-style-type: none"> Within the document the expected duration of the projects is not specified. Is there to be a baseline time period, or will such duration be set by the project owners without restriction? 	<p>According the ProClima Standard, section 10.3, the quantification periods of GHG emission reductions or removals are as follows: (a) for projects in the AFOLU sector, other than REDD, a minimum of 20 years and a maximum of 30 years; NOTE: For projects that propose to use a methodology developed by ProClima, they must comply with the ProClima Standard.</p>
		<ul style="list-style-type: none"> One of the greatest risks to wetlands worldwide is that their soils will be drained for agricultural or infrastructure uses. Such drainage generates large amounts of CH4 and CO2 emissions. However, the methodology only contemplates the assessment of methane emissions from combustion but not from water level alteration. Is there any reason why this issue is not addressed in the methodology considering that this is what could generate the greatest potential for emission reductions by protecting or restoring this type of ecosystem? 	<p>Adjusted Emissions of CH4 and CO2 due to alteration of the water regime (changes in the water level) are included.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
2	5. Applicability conditions	<p>“d) The causes of land-use change include: the expansion of the agricultural/livestock frontier, mining activity, extraction or loss of natural vegetation cover, infrastructure (roads and urban), and tourism exploitation (tourism activities that exceed the carrying capacity of the ecosystem);”.</p> <ul style="list-style-type: none"> ● Land use changes do not include the drainage of wetlands for irrigation or agricultural activities. Is this type of activity included in the expansion of the agricultural frontier? We suggest that it should be an explicit activity. ● Would areas with a clear decrease (or risk of decrease) in water level be applicable for the project? ● ¿ Does the removal or loss of natural vegetation cover include peat and soil extraction? <p>“e) Project activities do not lead to alteration of the water regime of the project area or hydrologically connected areas due to anthropic interventions (e.g. irrigation, and/or drainage systems)”.</p> <ul style="list-style-type: none"> ● Does this mean that a project would not be applicable if anthropogenic interventions in the project area are causing the land use change and activities are planned to control or reduce such interventions? Or does it mean that natural hydrological conditions and the natural water regime cannot be altered as a consequence of project activities? Some of the most common practices that degrade wetlands are drainage and attempts to transform aquatic or semi-aquatic ecosystems into areas suitable for agriculture. Therefore, we suggest explicitly stating that project activities cannot affect the natural system. 	<p>Clarification / Adjustment</p> <p>Adjusted Footnote: The expansion of the agricultural frontier may also include the draining of wetlands as a practice associated with land use change activities related to crop or livestock production.</p> <p>As long as the determinants of this "clear decline" or "risk of decline" are of anthropogenic origin. These losses associated with the ecosystem are what the project activities are proposed to reduce.</p> <p>Refers to the natural vegetation cover defined as described below: Natural vegetation cover, different from forests It comprises a group of plant covers of a natural type and product of natural succession, whose growth habit is shrubby and herbaceous, developed on different substrates and altitudinal floors, with little or no anthropic intervention. For the CORINE Land Cover legend adapted for Colombia, this class includes other types of cover such as areas covered by shrub vegetation with an irregular canopy and the presence of shrubs, palms, vines, and small growth vegetation.</p> <p>The applicability condition signals that: “Project activities do not lead to alteration [...]”. This refers to the fact that the project cannot propose activities that lead to the alteration of the water regime.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
		<p>“h) It does not apply to coastal-maritime and high mountain wetlands, or artificial territories”.</p> <ul style="list-style-type: none"> Does this mean that wetlands within the Andean Cordilleras macro-region are not eligible? What would be the justification for not including high-mountain inland wetlands, which could have large amounts of carbon stored in the soil? 	<p>The methodology is proposed for the Orinoquia region.</p>
3	10.2 Reference region for baseline estimation	<p>“d) The reference region may include all or part of the project area.”</p> <ul style="list-style-type: none"> Could there be scenarios where the reference region is the vast majority (e.g. 95%) of the project area if similar reference ecosystems are not found near the project area? No minimum area required for the reference region is defined. Most methodologies for the development of conservation projects establish the minimum area required for the establishment of reference regions, which is a criterion that can considerably affect the project's emissions results. 	<p>In accordance with the provisions of section 10.2 (Reference region for baseline estimation) of the methodological document:</p> <p>The geographic boundaries of the reference region must meet the following criteria:</p> <ol style="list-style-type: none"> The reference region and the project area are part of the same ecoregion; The causes and agents that generate changes in land-use, identified in the reference region, can access the project area; The land tenure and land-use rights figures in the reference region must be similar to the project areas, after excluding them; The reference region may include all or part of the project area <p>As can be seen, the reference region is not related to "similar reference ecosystems". This connects with the term ecoregion, which is a much broader term.</p> <p>It would not be appropriate to determine the reference area almost entirely by the project area. In such cases the reference region should be expanded to such an extent that similar ecosystems, which meet all the other criteria of the reference region, are found.</p> <p>While it is true that some methodologies consider a size-related condition with respect to the area of the reference region, in some cases this may not be a methodological requirement. For example, the above comment (on 95% of the project area in the reference region) implies the need to adjust the reference region with respect to the conditions of the area in which the project is located.</p>
4	10.3 Leakage areas	<p>“Areas with natural vegetation cover, to which activities that generate land-use change can be displaced and that are beyond the control of the project owner. That is, the areas</p>	<p>The natural vegetation covers referred to in this section of the methodological document are the covers present in areas classified as tropical inland wetlands.</p>

N°	Reference (Section and page in the document)	Comment, observation or suggestion	Clarification / Adjustment
		<p>to which the agents that generate land-use change can move, as a consequence of the project activities.”</p> <p>“The leakage area must include all areas with natural vegetation cover that are within the range of mobility of the agents identified in section 12 of this methodological document.”</p> <ul style="list-style-type: none"> ● According to the above, would the leakage area include any natural vegetation cover other than those found in the project area, i.e., could a native forest be considered within the leakage areas? 	<p>The scope of the methodological document states the following:</p> <p>“This document corresponds to a methodology for the establishment of a baseline, quantification of GHG reductions/removals, monitoring, leakage management, and conservation of biodiversity associated with continental wetlands ...”.</p>
5	14. Socio-environmental assessment	<ul style="list-style-type: none"> ● Should the analysis of the socio-environmental effects of project activities include primary data collection? 	<p>There is no restriction regarding the information related to the socio-environmental assessment. It can be primary and/or secondary information.</p>
6	16.2.2 Definition of sampling points	<p>“The delimitation of the project area give rise to the strata polygons. On these, the type of sampling to be carried out is defined: systematic, random or in transect”</p> <ul style="list-style-type: none"> ● Will the required plots in the different strata of the project area be permanent or temporary plots? 	<p>Although it is considered good practice to establish temporary plots, permanent plots can be used for sampling.</p>
7	16.2.3 Field measurements	<p>“Locate in the field the pre-established sampling points, according to the delimitation and the stratification of the wetland, considering the following guidelines:”</p> <p>The field measurement guidelines for herbaceous biomass and leaf litter do not specify the type of analysis to be performed. Only the form of collection is mentioned, different from soils and woody biomass, shrub and dead wood where the analysis to be performed is specified. We suggest that these sampling guidelines be more detailed.</p>	<p>The detail of the sampling should be defined by the project owners, always using valid sampling methods that demonstrate the necessary statistical rigor.</p>