The "METHODOLOGICAL DOCUMENT. AFOLU SECTOR. Quantification of GHG Emission Reductions or Removals from Sectoral Mitigation Projects. Forest crops and Oil palm crops. Version 01.0" provides holders of GHG mitigation initiatives (forest crops and oil palm crops), good practices related to procedures, equations, parameters and data to quantify GHG removals attributable to project activities.

The methodology includes aspects related to the identification of the baseline scenario, additionality considerations, stratification, GHG removal by sinks (including leakage) and the monitoring plan, with quality control and quality assurance procedures.

As described in the document, the holders of sectoral GHG mitigation projects will have complete and detailed guidance to design GHG emission reduction or removal projects.

The document was published on the ProClima website (www.proclima.net.co) on December 10, 2019, with a 30-working day deadline for stakeholder comments. Additionally, it was sent to the following stakeholders, via emails.

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Otros grupos de interés	Boletín Técnico Agroclimático de Magdalena, Cesar, Guajira (MCG) - A través de Finagro Mesa Agroclimática IDEAM - Through Finagro Asocarbono	

During the public consultation period, comments were received from various stakeholders. PROCLIMA thanks those who sent their comments, cooperating with the joint construction of the documents, and pursuing the quality of GHG mitigation initiatives through the application of appropriate procedures and concepts.

As a result of the public consultation process results the METHODOLOGICAL DOCUMENT. AFOLU SECTOR. Quantification of GHG Emission Reductions or Removals from Sectoral Mitigation Projects. GHG removal forestry activities and oil palm cultivation. Version 2.0. March 27, 2020.

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

Federación Nacional de cultivadores de palma de aceite – FEDEPALMA

Reference	Comment, remark or suggestion	Clarification/Adjustment
Definition of palm oil crop	The current definition refers to only one type of oil palm, *Eleais guineensis Jacq*. According to the National Council for Economic and Social Policy, the oil palm is a monocotyledonous plant, included in the order Palmales, family Palmaceae, genus Elaeis and species E. guineensis. In addition to the species *Eleais guineensis*, mention should be made of *E. oleifera*, commonly known as Noli or American oil palm, native to Colombia, Panama and Costa Rica. There are other species of *Elaeis oleifera* such as Coari and Manicore, native to the Brazilian Amazon. The oleifera species have been crossed with guineensis to produce hybrids in which the characteristics of both parents are improved. The oil palm is grown in the equatorial tropics and is the oil crop that produces the greatest amount of oil per unit area, which, with a 50% content in the fruit, can yield from 3,000 to more than 5,000 kg of pulp oil per hectare. We consider that this definition is more complete and covers the present types of oil palm in Colombia (Page 18 and 53).	Hedge composed of oil palm (Elaeis guineensis Jacq.), a perennial plant with a solitary trunk and pinnate leaves belonging to the Arecaceae family, which can reach heights of up to 12 meters. This is the CORINE Land Cover definition, adapted for Colombia. However, other oil palm species used in Colombia are also considered. The text has been expanded in section 7.
Starting date	It is defined with a retroactive period of five (5) years. However, it is proposed that this period should be extended because only 11% of the area planted with palm oil meets this condition for at least 10 years, taking into account that this crop has an unproductive stage of four years. (Page 29)	This requirement is aligned with the national legislation, specifically Resolution 1447/18.
Project location	According to the document, only projects located in municipalities of Development Programs with a Territorial Approach (PDET) are allowed. We believe that this requirement should be associated with the technical viability of the projects without affecting protected areas, which is why the classification of the	This requirement has been eliminated.

	Unidad de Planificación Rural Agropecuaria (UPRA) should be taken, specifically the high suitability areas. (Page 35 (a)).	
Identification of wetlands	It should be established what information will be taken into account to analyze the presence and/or existence of wetlands in the project area, since there is currently no official wetland classification map for Colombia.	First of all, through the multitemporal analysis of satellite images (within the geographical limits of the project), the coverages and classification categories used can be determined and include the wetland category, classified as: Inland wetlands, Coastal wetlands and Water surfaces. On the other hand, information on wetlands and Ramsar areas can be found in various national information sources, such as the MADS (RAMSAR Wetlands - MADS Map) and the IAvH (Interactive Map of Colombian Wetlands).
GHG sources	Table 2 of numeral 8.2 shows the sources of emissions and the associated GHG for woody biomass combustion. Within the shown justifications , the combustion of woody biomass is mentioned, due to site preparation. It is important to note that in Colombia any type of burning for soil preparation is prohibited. Therefore, the reference to burning for soil preparation should be eliminated or, alternatively, an explanatory note should be included in the methodology.	Reference is made to the fact that it is allowed by the methodology, however, the initiative holder must select and justify.
Tools	The Federation has elements that can serve as inputs for the development of this methodology. For example, Cenipalma developed a calculator to quantify GHG emissions during the CPO production cycle, as part of an agreement with the Federation. \WI/F from 2017 to 2019. - Therefore, the use of this tool is proposed within the development of the activities of this methodology corresponding to oil palm.	The mentioned tool allows the calculation of emissions during the production cycle. However, this methodology is proposed to calculate GHG removals through crop growth.

Ministerio de Ambiente y Desarrollo Sostenible - Dirección de Bosques, Biodiversidad y Servicios Ecosistémicos, Grupo Gestión Integral de Bosques y Reservas Forestales

Reference	Comment, remark or suggestion	Clarification/Adjustment
1. Introduction (p.5)	Although it is true the target audience is familiar with the subject matter, it is suggested that the respective GHG and LUCUCF be included.	Adjusted The Glossary of terms has been added.

	It is necessary to specify whether the excluded areas are "natural forest cover" or "cover of other natural ecosystems". Under this perspective, specific reference is made to wetlands. In addition to making reference to the exclusion of wetlands, the situation should be reviewed with respect to other natural ecosystem coverages that would be excluded, as would be the case of "paramos", as well as the natural coverages of "savannas".	Regarding the excluded areas, the texts state the following: This Methodology is applicable under the following conditions: (a) The areas within the geographical boundaries of the project do not correspond to the forest category (as defined by the Forest and Carbon Monitoring System), nor to natural vegetation covers other than forest at the beginning of project activities, nor five years prior to the project start date; Eligible areas: ... eligible areas must comply with the condition of absence of forest, or natural cover other than forest at the date of initiation of the project activity and five years prior and, additionally, this characteristic shall be demonstrated for each date of establishment of a new crop. The definition of "Natural vegetation cover, other than forest" is included in the terms and definitions section. Regarding the land use categories that classify these areas, the following has been added in section 9: "For the identification of natural vegetation cover other than forest, the holder of the GHG mitigation initiative shall use the categories defined by the CORINE Land Cover methodology adapted for Colombia. According to this classification, natural vegetation covers other than forest corresponds to areas with herbaceous and/or shrub vegetation including: (a) Herbazal, (b) Arbustal and, (c) secondary or transitional vegetation."

		This is consistent with the MADS comment related to "*paramos*" and "savannas".
5. Applicability conditions (p.7)	The comments for the conditions are as indicated for page 5 of the document. With regard to paragraph f) on the violation of any applicable law, it is necessary to identify aspects related to RENARE and the application of safeguards in general.	Everything related to RENARE is described in the Program document. Regarding safeguards, this issue is specifically considered in the methodology for REDD+, which is currently under review for adjustments.
6 Normative references (p.8)	Regarding paragraph b) on the national legislation in force, related to forest crops and permanent tree crops, or that which modifies or updates it, at the moment we have Decree 1532 of 2019 (Protective Plantations) and Decree 2398 of 2019 (Commercial Plantations).	Agreed, although the text does not refer to any particular legislation. The owner of the initiative must have a management system in place to ensure that he considers the legislation applicable to the project activity.
	Taking into account that the Forest and Carbon Monitoring System is referenced, it is suggested to include the reference Decree 1566 of 2017 "Whereby it is added to Book 2, Part 2, Title 8, Chapter 9 of Decree 1076 of 2015, five new sections in the sense of establishing the organization and operation of the National Forest Information System, the National Forest Inventory and the Forest and Carbon Monitoring System that are part of the Environmental Information System for Colombia, and other provisions are issued."	Adjusted. It is included in the listing.
7 Terms and definitions (p.9)	In the "eligible areas" item, it is recommended to review for an editing adjustment: "...That is, eligible areas must meet the condition of forest absence , or natural cover other than forest at the date of initiation of the project activity and five years prior and, additionally, this characteristic must be demonstrated for each date of establishment of new crop..."	Adjusted. The text has been reviewed and updated.
	In the item "Permanent tree crops in agricultural lands", it is necessary to analyze the palm trees in the sense that biologically, since they do not consist of lignin, there are some considerations for not considering them as permanent tree crops. Regarding the annotation that "...This Methodology is applicable to GHG mitigation initiatives that consider oil palm crops, developed in agricultural territories...", it is suggested to leave it in the section on "Oil Palm Crops".	The CORINE Land Cover definition states the following: "2.2.3 Permanent tree crops Cover mainly occupied by crops of tree habit, other than timber or salvage forest plantations, such as citrus, palm, mango, etc." Within the permanent tree crops, four types of cover crops were identified: oil palm, citrus, mango and other

		crops, which are described below: Hedge composed of oil palm (Elaeis guineensis Jacq.), a perennial plant with a solitary trunk and pinnate leaves belonging to the Arecaceae family, which can reach heights of up to 12 meters. It is grown preferably in flat to slightly undulating terrain, in lands located below 500 m above sea level, under warm climates.
7 Terms and definitions (p.10)	In the definition of forest, in the document that refers to Corine Land Cover -CLC Colombia-, it is suggested to include a bibliographic citation. Likewise, it is suggested that subsequent citations in this document should include a uniform text, since sometimes it appears as "CORINE Land ...", i.e., with a capital letter.	Adjusted CORINE Land Cover (Capital) The complete reference to the document can be found in a note: IDEAM, 2010. NATIONAL LAND COVER LEGEND. CORINE Land Cover methodology adapted for Colombia Scale 1:100.000. Institute of Hydrology, Meteorology and Environmental Studies. Bogotá, D.C., 72p. Available at : http://siatac.co/c/document_library/get_file?uuid=a64629ad-2dbe-4e1e-a561fc16b8037522&groupId=762
7 Terms and definitions (p.11)	In the palm cultivation item, biologically they do not have a trunk but a stipe.	Definition of CORINE Land Cover.
7 Terms and definitions (p.12)	In relation to the "Baseline or Reference Scenario", it is suggested to analyze the implications of mentioning the "Reference Level" that Colombia is developing within the framework of Warsaw REDD+.	This methodological document excludes GHG mitigation initiatives - REDD+ projects. The methodological document for REDD+ considers everything related to the Reference Level.
	Review the relevance of including a definition of "Holder" to clarify some basic aspects and roles.	Adjusted Definition included in terms and definitions.
8.1. Carbon pools (p.12)	It is suggested to make a form adjustment so that the first letters of the words are capitalized for "The Intergovernmental Panel on Climate Change (IPCC)".	Adjusted
9 Eligible areas for GHG mitigation initiatives in the land use, land-use change and forestry sector	In paragraph b) of ".... Field studies (permits or concessions..." it is convenient to specify the term "land use or management records", as it is not a used common language , since land use or land cover maps are usually made.	Adjusted This section has been removed from the document.

(p.14)		
10.2.1. Conditions demonstrating additionality, by means of a positive list (p.18)	In paragraph e), regarding the reference to UPRA, it is usually made in the following terms Unidad de Planificación Rural Agropecuaria- UPRA.	Adjusted
10.2.1. Conditions demonstrating additionality, by means of a positive list (p.19)	Regarding literal f) of oil palm crops where it is stated that "...where at least 30% is located outside the areas of high aptitude for commercial oil palm cultivation, according to the classification of the UPRA (Agricultural Rural Planning Unit)10....", it is suggested to review the environmental and economic viability of establishing oil palm crops outside the UPRA definition of such areas, it could generate unforeseen impacts in the sense that there are areas that are not suitable or have strong limitations that due to circumstances have been or are planned to be established.	According to UPRA, "the zoning of suitable areas for the establishment and development of commercial palm cultivation at a scale of 1:100,000, in a way that contributes to guide the development of this activity under environmentally sustainable, economically competitive and socially appropriate criteria. It responds to the priorities of the strategic plan for the palm sector". The requirement refers to the establishment of crops in suitable areas, although with areas in zones of medium or low suitability. Another requirement related to the suitability of the soil is indicated in the document, which contemplates what is indicated in the commentary.
Sub step 2c. (p.22)	Adjust editing in the last word, "....Option II (investment comparison analysis): if one of the other alternatives has the best indicator (e.g., a higher IRR), then the project cannot be considered as financially attractive ."	Adjusted
Sub step 3a. (p.24)	In addition to barriers due to local ecological conditions, it is suggested to consider other pressures such as illegal mineral extraction or illicit crops.	These do not correspond to ecological conditions.
	In the section on social barriers, it is suggested to review the relevance or the way in which aspects of public order, illicit crops, among others, would be included.	Adjusted Included in barriers due to social conditions.
12.1. GHG removals by sinks in the baseline scenario (p. 27)	This section refers to the methodological tool for calculating changes in carbon stocks of trees and shrubs in afforestation and reforestation project activities. Taking into account the above, regarding the biological difference between palms and trees, it is recommended to refer to the methodological tool for the case of palm crops.	The tool provides procedures and equations applicable to forest species and palm cultivation. Both timber volume (for forest species) and biomass (for forest species and palm) equations can be used.

Empresas Públicas de Medellín - EMP

Reference	Comment, remark or suggestion	Clarification/Adjustment
Title - Cover	Just as there is a methodological document for "forest crops", will there also be a methodological document for "REDD+ projects"?	METHODOLOGICAL DOCUMENT. AFOLU SECTOR. Quantification of GHG Emission Reductions from REDD+ PROJECTS. VERSION 01.1 (March 2020) has been submitted for public consultation and is currently under review for adjustments.
7. Terms and definitions – Eligibles areas (p.8)	What does it mean "the areas within the geographical limits of the project" do not correspond "to the beginning of the project activities, nor five years prior to the project start date"? This is confusing.	Areas that meet the condition of absence of forest, on the reference dates established by the Proclima Program. That is, the areas within the geographical limits of the project do not correspond to the forest category (according to the definition of the Forest and Carbon Monitoring System), nor at the beginning of the project activities, nor five years before the project start date.
7. Terms and definitions – Project starting date (p.10)	Since "start date" was a term also defined in the document entitled "Proclima program", the full title of the term to be defined in this document should be given here, i.e., "Start date of the forest crops and oil palm crops project".	Adjusted text For GHG removal forestry activities and palm cultivation, this starting date corresponds to the date on which site preparation, crop establishment, initiation of restoration activities or other actions related to the start of project activities .
7. Terms and definitions – Ecological restoration (p. 12)	How does the initiative holder guarantee that it is a self-sustaining system?	This definition is taken from the national restoration plan.
9. Eligible areas for GHG mitigation initiatives in the land use, land use change and forestry sector. (p.14-14)	How so "eligible areas for GHG mitigation initiatives" do not correspond "to the start of project activities, nor five years prior to the project start date"?...? The idea is not clear.	The holder of the GHG mitigation initiative must demonstrate that the areas within the geographical boundaries of the project do not correspond to the forest category (according to the definition of the Forest and Carbon Monitoring System), nor to natural vegetation cover other than forest, nor at the beginning of the project activities, nor five years prior to the project start date.

12.2.1 Soil organic carbon (p. 33)	This term has not been explained below. What is in the formula below should be included: SOCINITIAL,i = SOC reserve at the beginning of the Project in stratum i; t C ha[1]	Adjusted Explanations have been included.
12.2.1 Soil organic carbon (p. 34)	The explanation of this term of the equation must also be taken, as was done in the previous formula.	Adjusted Explanations have been included.
12.3 Leakage (p.42)	The formula for calculating the reserve should also be included.	The equation can be found at the end of this section.

South Pole Carbon Asset Management S.A.S.

Reference	Comment, remark or suggestion	Clarification/Adjustment
6. Normative references (d) (p.8)	Note that the use of IPCC 2006 BEF, root to shoot radio, etc. values should be accepted until a newer version of default values is released.	The literal has been deleted. The Program document indicates what applies to the use of default values.
7. Terms and definitions –Eligibles areas (p.8)	Missing addition of "or natural cover other than forest"	Adjusted
7. Terms and definitions –Eligibles areas (p.9)	"To demonstrate the eligibility of areas within the project boundaries, land covers must be identified for each planting lot, on each and every date on which activities in the forestry sector are established". It is suggested to indicate to use the IPCC land cover or to define own categories for Proclima. Corine Landcover definitions tend to be subjective in some cases and change from year to year. For example, in 2005 they may say that the area is grassland and in 2010 that the area is a shrub[1] (thinking of the country layers). Better to indicate, for example, that coverages should be classified into grass , crops, forests, settlements, water bodies, other natural coverages (grassland, páramo vegetation, etc.) and other non-natural coverages (bare soils, etc.). I consider that this is necessary for the start date, and for the other dates, simply show that no forest was cut (as long as the new areas are not in additional areas to those already evaluated at the start date and this can be mitigated by ensuring that from the validation,	Adjusted Included in section 9 eligible areas.

[1] Herbazal

	the extension area of the project is made clear for the inclusion of additional areas) because in theory the new areas do not have to be another natural cover because it would simply rectify that there was no forest after 5 years, which is the maximum time of retroactivity.	
7. Terms and definitions – Project starting date (p. 10)	Add that a support must be submitted and define what is accepted as support. Otherwise, it will depend on the OVV and this in some cases may or may not benefit the developer. Keep in mind that many "small" plantations have not been planted by large reforesters and therefore do not tend to have all their establishment documented. It is important for developers to know the level of detail needed to prove the start date, for example, to define if there are plantations that we should not finance because we do not have clear supports to prove the start date.	Adjusted "Documentary evidence may include contracts for the provision of services related to the establishment of forestry activities and/or crops, invoices for the purchase of plant material, records in activity execution spreadsheets, contracting of labor, among others."
	Here it would also be good to add more detail on how it can be demonstrated that there is no leakage. The CDM tool, in order to be fully applied, sometimes requires information that is difficult to obtain, because it implies having knowledge about the activities of the former owners, which I do not consider relevant because who is claiming the incentive is the new owner, which is the one who is making the land use change.	This aspect is defined in section 12.3 of the methodological document.
7. Terms and definitions – Ecological restoration (p. 12)	There are projects in which planting is carried out in areas that had natural cover with the objective of enriching the natural cover, can these activities not claim carbon? because in many cases it is not carried out as part of REDD, but rather as an improvement of the natural cover.	Adjusted. Including activities related to restoration
9 Eligible areas for GHG mitigation initiatives in land use, land use change and forestry sector (p. 15)	"Holders of GHG mitigation initiatives may add areas to the project, only during the two (2) years following registration in the Program and, demonstrating that both the eligibility condition of the areas as well as the additionality characteristics and what is related to the applicable legislation are met." We propose that it not be limited to two years. Some alternative options for restricting "bundled" projects may include: 1. The initiative holder must present the area in which it will include new areas (project expansion region). 2. New areas will be limited to the credit period of the validated initiative.	Although there are other rules for the addition of areas, the maximum period of 2 years is maintained.

11. Stratification (b) (p. 27)	This applies for ex-ante. In ex-post, the stratification may change, for example, by site index, differences in maintenance, seedling response to the site, etc.	This is precisely what the inventory responds to (differences by site index, maintenance, etc.), but the strata must be determined according to species and year of planting. Although other parameters can also be included for this purpose. This is defined by the owner of the initiative, justifying the strata identification .
13.1 Monitoring of the project boundaries (p. 45)	No mention of absence of natural cover.	This aspect is determined in the definition of eligible areas.
13.3.1.2 Sampling plots (p. 47)	Do they have to be temporary?	The purpose of the permanent plots is to establish the growth pattern of the species under the bioclimatic conditions of a region. With permanent plots in several regions, the most refined and accurate model can be obtained. With permanent plots, even demographic variables such as mortality can be estimated. On the other hand, temporary plots are inventory plots, with which the standing volume of a plantation is established at a given time. They are temporary because the randomization systems of the inventories mean that throughout the life of the plantation, it is very difficult to draw the same points. On the other hand, temporary plots which generate an estimation of standing volume, represent a greater number and require less area than permanent plots. The following note has been added. "If permanent plots are available in the project area, they can be used for sampling. However, it is considered good practice to establish temporary plots."