

Methodology for Estimating Reductions of Greenhouse Gases Emissions from *Frontier Deforestation*

July 29, 2009

Dear VCS,

Please accept these comments regarding the Methodology for Estimating Reductions of Greenhouse Gases Emissions from *Frontier Deforestation*. If you have any questions, please contact me directly at: gthoumi@mgminter.com

Thank you,



Gabriel Thoumi
Sr. Business Development Manager
MGM International

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Under Step 1 definition of boundaries, please include point “1.5 Legal Boundaries”. A project’s strength lays on a foundation of the project’s legal boundaries which need to be considered under project protocol or project methodology.

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Under Step 0, please define “clear land ownership or tenure”.

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