SUMMARY OF PUBLIC CONSULTATION

VMD0063 Performance Method for Reduced Impact Logging in Natural Forest in the North of the Republic of the Congo, v1.0

A draft of VMD0063 Performance Method for Reduced Impact Logging in Natural Forest in the North of the Republic of the Congo, v1.0, was open for public consultation between March 11, 2025 and April 10, 2025. This document includes a list of all comments received and <Verra's or the developer's response.

GENERAL FEEDBACK

Section 1 - Summary Description

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#	Organization	Comment	Developer's Response
1	Anonymous 1	This is a general remark on the M0183, Draft Module in relation with the text from VM0035, p. 11: "Projects may only be credited for emission reductions from one or more impact parameters if they are deemed additional. A project is deemed additional for one or more impact parameters if the impact parameter is below the additionality benchmark assigned for that impact parameter. The project may only be credited for emission reductions if all impact parameters are at or below their respective crediting baselines. This benchmark threshold should be conservative and strike a balance between restriction of freeriders and feasibility of	Comments 1 and 2 are addressed together. The methodology developer supports the intent of allowing crediting for individual impact parameters and explains the safeguards needed against trade-offs between parameters (e.g., HAUL versus SKID) and free-rider participation. The comment is considered addressed, noting that the final module remains aligned

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		participation. This threshold may be different from (i.e., lower than) the crediting baseline. Thus, while a project must be below the additionality benchmark in order to receive any emission reductions credits, once below the additionality benchmark, the amount of credits generated is measured using the crediting baseline." We propose to consider the following for the M0183, Draft Module: 1) Allow selective crediting of individual impact parameters if robust data demonstrates that specific impacts are below the additionality (and crediting) baseline, even if other parameters exceed the average due to specific circumstances, for example a particular high density of trees in one annual harvest area. This should be allowed if it does not significantly affect the total emissions and emissions reduction (for example, not affecting more than 10% of the emissions (and ER). In such cases, parameters exceeding the baseline would be excluded from crediting, but should not disqualify the entire project year from receiving credits for projects that clearly perform better than the crediting baseline on average. This approach maintains environmental integrity while encouraging broader participation and rewarding verifiable improvements in specific areas. It is not feasible that always all impact parameters are below the additionality benchmark. Important is, that on average the whole project remains below the crediting benchmark, to allow crediting of the impact parameters below the additionality benchmark. 2) Crediting may still be granted for individual impact parameters that have been properly monitored and shown to be below the additionality and crediting benchmark, even if other impact parameters were not monitored in the same way. In cases where	with VM0035, which requires all impact parameters to be at or below their benchmarks.

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		reliable primary data, which were obtained from modelling and regression analysis of other data than those proposed in the methodology, demonstrate that an impact parameter does not exceed the crediting benchmark, that parameter may be excluded from crediting. Its exclusion shall not affect the eligibility for crediting of other impact parameters that have been monitored as described in the methodology and demonstrate clear emission reduction below the additionality benchmark."	
2	Anonymous 2	General remark on the M0183, Draft Module related to the below text from VM0035 •"Projects may only be credited for emission reductions from one or more impact parameters if they are deemed additional. A project is deemed additional for one or more impact parameters if the impact parameter is below the additionality benchmark assigned for that impact parameter. The project may only be credited for emission reductions if all impact parameters are at or below their respective crediting baselines." • We propose the following clauses be included in the M0183 Module: • Allow selective crediting of individual impact parameters if robust data demonstrates that specific impacts are below the additionality (and crediting baseline), even if other parameters exceed the average due to specific circumstances (for example a particular high density of trees in one annual harvest area), but it does not significantly affect the emissions (for example, not affecting more than 10% of the total emissions average reduction). In such cases, parameters exceeding the crediting baseline would be excluded from crediting but should not disqualify the entire project year from receiving credits for parameters that clearly perform better than the	Please see response to comment 1.

Section 1 - Summary Description			
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		benchmark. This approach maintains environmental integrity while encouraging broader participation and rewarding verifiable improvements in specific areas. • Crediting may still be granted for individual impact parameters that have been properly monitored and shown to be below the additionality and crediting benchmark, even if other impact parameters were not monitored in the same way. In cases where reliable modelled data (or empirical studies) demonstrate that an unmonitored impact parameter does not exceed the crediting baseline, that parameter may be excluded from crediting. However, its exclusion shall not affect the eligibility for crediting of other impact parameters that have been robustly monitored and demonstrate clear emission reduction.	

Section 3 - Definitions

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#	Organization	Comment	Developer's Response
3	Wildlife Conservation Society	Please provide clarification on following terms: • Terms including annual harvest area, harvest area, harvest blocks, sub-blocks should be clarified as being specific to this methodology, or whether they are meant to stand for existing conventions used in the forestry sector in Congo. Providing French translation would help. E.g. what corresponds to Assiette Annuelle	The methodology developer revised Section 3 to add a definition for Annual Harvest Area, clarify Actual Harvest Area using VM0035 language, consistently use 'felled tree' and 'collaterally damaged tree', and add regionally

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		de Coupe vs. Parcelle ? • Felled tree and harvest tree: can you make more clear how these differ? Is one a subset of the other? • Consistently use term "collaterally damaged tree" or "damaged tree" if these are the same meaning • There is a regional confusion between skidding and hauling. These terms should be clearly defined. • Is "harvest area (At)" understood to be the same as 'annual harvest area' referenced elsewhere in the text?	informed definitions of skidding and hauling. These revisions resolve the terminology ambiguities raised by the commenter.

Section 4 - Applicability Conditions

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4	Anonymous 3	Active logging threshold revision: The threshold of 0.25 trees/ha should be justified by robust statistical analysis. Based on the 11 samples provided, what is the actual mean and standard deviation of harvest intensity? This threshold appears arbitrary without supporting data.	The methodology developer provided the requested statistics (mean of 0.68 trees/ha, SD of 0.21), showing the 0.25 trees/ha threshold is about two standard deviations below the mean. This provides a quantitative justification and shows the threshold is conservative rather than arbitrary.

Section 5 - Procedures

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5	Anonymous 2	• Page 8 / Page 13 (Table 2): Harvest block names are not connected to background information about blocks. o Recommendation: label the blocks were measured in 2019 vs. 2022	The methodology developer labelled the harvest blocks in Table 3 by year of measurement (2019 and 2022), as recommended. This improves the traceability of the sampled data.
6	Anonymous 2	• Page 8 / Page 13 (Table 2): Harvest block names are not connected to background information about blocks. o Recommendation to label the blocks in Figure 1 o Recommendation: label the harvest blocks that have the FSC certification	The methodology developer explained that labelling individual harvest blocks or their FSC status would breach confidentiality obligations under its MOU with the ROC government and concessionaires. Representativeness information is still provided at an aggregate level, so the methodology developer has taken due account of the comment and given a clear rationale for not disclosing block identities.
7	Wildlife Conservation Society	To WCS's knowledge, commercialization of upper stem logs is not practiced in Northern Congo. What is intended by reference to this practice in the module is not clear. This issue brings up questions of how merchantable wood is understood in the module. If a RIL operator considers upper stems to be merchantable, then this higher standard should be applied to all operators.	The methodology developer clarified that upper stem logs are mentioned only as a possible practice to reduce emissions and are not used in the definition or quantification of any impact parameter. This resolves the commenter's concern about how merchantable wood is interpreted in the module.

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8	Anonymous 1	p. 16, 5.1.5.2 Quantification of GHG Emission Reductions "Reductions in the SKID impact parameter ... " REMARK: replace "SKID" by 'HAUL'. p. 9, 5.1: "Benchmarks were set at 85% of the value of the Crediting Baselines for each impact parameter. The values for all impact parameter benchmarks and the basis for their derivation, are given in Table 1 and 3." REMARK: in other chapters below, the 40th percentile is mentioned as additionality benchmark. This phrase does not seem to be correct. All these chapters mention 40th percentile: p.13: "5.1.2.1 The additionality benchmark for FELL1 is set at 5.9 damaged trees per harvest tree, which is the 40th percentile of FELL1 values across all harvest blocks sampled. Based on field measurements and expert consultation, this is considered a feasible yet ambitious threshold p. 14: "The additionality benchmark for FELL2 is set at 5.5 percent of felled tree log length abandoned, which is the 40th percentile of the FELL2 parameter across all harvest blocks sampled. Based on field measurements and expert consultation, this is considered a feasible yet ambitious threshold. " p. 15: 5.1.4.1 "The crediting baseline for SKID was set at 3.3 damaged trees/ha representing the mean value across all annual harvest blocks sampled. The additionality benchmark for SKID was set at 2.6, which is the 40th percentile of the crediting baseline across all harvest blocks sampled." 5.1.5.1 "The crediting baseline for HAUL was set at 404.3 m2/ha representing the mean value across all annual harvest blocks sampled. The additionality benchmark for HAUL was set at 330.8 m2/ha, which is the 40th percentile of the crediting baseline across all harvest blocks sampled."	The methodology developer corrected the identified inconsistencies, replacing 'SKID' with 'HAUL' in Section 5.1.5.2 and consistently describing the additionality benchmark as the 40th percentile of each impact parameter. The comment has been incorporated into the revised module.
9	Anonymous 2	• Page 9 (Section 5.1): "All crediting baselines were set at the mean value	The methodology developer

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		for each impact parameter, Additionality Benchmarks were set at 85% of the value of the Crediting Baselines for each impact parameter." o This does not appear to be true anywhere else in the document. It should be amended to read: "Additionality Benchmarks were set at the 40th percentile of the impact parameter across all sampled harvest blocks". • Page 12/13 (Table 2): Remove Additionality Benchmark (25th perc) – these values are not used anywhere in the document. • Page 16 (Section 5.1.5.2): "Reductions in SKID" – change to "Reductions in HAUL"	corrected the '40th percentile' and 'HAUL' typos and removed the unused 25th percentile row from Table 3. All requested edits have been incorporated into the revised module.
10	Anonymous 2	• Page 10 (Section 5.1.1.1): Clarify that the 95% confidence interval corresponds to the parameters for converting impact parameters to tCO2e, not to the impact factors themselves.	The methodology developer added detail in Section 5.1.1 clarifying what the 95% confidence interval refers to. This resolves the ambiguity raised by the commenter.
11	Wildlife Conservation Society	Table 1 - Should it be clarified that Haul roads only consider roads newly constructed as part of the harvest? There are preexisting roads in some areas. 5.1.2.2 - FTDt: can it be clarified that FTDt includes abandoned trees? This is fundamental for RIL as some companies can abandon up to 10% of their felled trees. FELL2B: 6.1% is surprisingly small as the benchmark. Log yards alone may have 25% of logs abandoned. Please take particular attention to ensure that all abandoned logs, including those that have been moved, are accounted for	The methodology developer clarified that FTDt includes abandoned trees and explained that logs moved to landings cannot be traced back to a sampled area, so the conservative 6.1% FELL2 value reflects all traceable abandonment. The methodology developer also confirmed that road reuse in the dataset is negligible, so the comment is considered addressed.
12	Anonymous 3	2. Insufficient sampling size: 11 harvest blocks across 9 concessions represent too limited a sample to establish robust reference parameters. We recommend increasing to at least 15-20 concessions to cover the variability in forestry practices.	The methodology developer responded to each point, explaining that the sample covers most of the active concessions (11 blocks out of 13 active concessions), that FSC weighting follows the precedent of

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		3. Sampling bias: The deliberate overrepresentation of FSC-certified concessions (5 out of 11 samples) introduces a conservative bias which, although intentional, significantly distorts the representation of actual forestry practices in the country. Without knowing the true proportion of FSC-certified concessions in the Republic of Congo (which is approximately 30-35% of commercially managed forest area), it is impossible to determine how conservative this bias makes the baseline. This misrepresentation could not only discourage non-certified operators from adopting RIL-C practices but also undermines the methodology's claim to reflect actual baseline conditions. A more balanced stratification with separate analysis of these two populations would provide both statistical validity and practical applicability. 4. High variability in Table 2 measurements: The FELL1 parameter shows values ranging from 3.8 to 16.0 damaged trees per felled tree, a variation factor of more than 4x. This suggests either highly inconsistent practices or potential measurement errors. The standard deviation should be reported alongside the mean values. 5. Forest stratification omission: The methodology does not stratify forests by type, harvesting density, or management history. Without such stratification, the application of these parameters across the varied forest ecosystems of the Republic of Congo (and potentially neighbouring countries) introduces significant error. A basic stratification approach would improve statistical validity while maintaining methodological simplicity. 6. Volume vs. length measurements: The FELL2 parameter measures log abandonment as a percentage of length, while forestry operators work with volume. For a tree with a diameter of 80cm at breast height and 20m of merchantable length, a 6.1% length abandonment (baseline value) would represent approximately 8-10% of volume due to the greater diameter at the tree base. This discrepancy is further complicated by the methodology's failure to account for different tree species, which have varying taper rates	earlier modules for conservativeness, and justifying the use of unstratified, length-based and pooled-species data. The methodology developer also reported SD values, strengthened SKID sampling to require censused blocks totalling at least 5 km, and explained the exclusion of FELL2 data and the 10 cm DBH threshold.

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		and wood densities. For example, Sapelli (Entandrophragma cylindricum) has different stem geometry compared to Iroko (Milicia excelsa) or Okoumé (Aucoumea klaineana), resulting in significantly different volume-to-length ratios. Applying a uniform conversion factor across all harvested species introduces systematic errors in carbon stock calculations and misrepresents actual commercial practices. 7. Missing data in Table 2: For FELL2 (% of abandoned log length), 3 sites out of 11 have no data (ROC2, ROC5, ROC6), which weakens the representativeness of this parameter. The baseline value of 6.1% is calculated from only 8 samples, which is statistically insufficient. 8. Skidding trail coverage: The SKID methodology should explicitly require measurement of the entire skidding network for an entire harvesting block/pocket, from each tree stump to the log yard, to avoid systematic underestimation. The better would be to systematically measure this parameter at the level of the Harvest Area (year t). The distinction between main skid trails and trails to access specific trees is ambiguous in the module and requires explicit definition to prevent miscalculation or double-accounting with FELL1 parameter. 9. Small tree inclusion rationale: The methodology requires measuring trees from 10cm DBH for FELL1, despite these smaller trees contributing minimally to carbon stocks. This significantly increases field measurement burden without clear carbon accounting benefits. A analysis justifying this threshold and why 20cm is not enough should be provided	
13	Anonymous 4	Sampling are not sufficient : 11 harvest blocks across 9 forest concessions represent too limited a sample to establish robust reference parameters. We recommend increasing the number of concessions to cover the variability in forestry practices. There is also an overrepresentation of FSC-certified concessions (5 out of 11 samples) which is not representative of the context of the forest sector	Please see response to comment 12 which justifies the representativeness of the sample and the conservative FSC weighting.

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		in Congo.	
14	Anonymous 1	p.16, 5.2: "The purpose of monitoring is to generate primary data (original information collected directly from the with-project area) after each harvest which describe impacts of harvest on the residual stand, from which emission reductions can be estimated. Primary data may include a combination of field and remote measurements. Following completion of timber harvesting in the treatment area, all impact parameters from all logging emission source categories must be sampled to generate primary data, and the calculated impact parameters must utilize primary data." PROPOSAL TO ADD: "However, the use of primary data originating from within the project area, but collected in different ways than proposed in the PMM, is permitted for specific impact parameters under the following conditions: (i) the impact parameter is excluded from crediting; (ii) available data have been obtained in the same project area, by modelling and regression analysis of regular and a large quantity of monitoring data, which show that the impact parameter remains below the crediting benchmark, and/or the project remains below the additionality benchmark." RATIONALE: It is often operationally and logistically challenging to monitor all impact parameters with the same primary data as described in the methodology, particularly for those parameters that contribute minimally to overall emission and emission reductions. Allowing limited use of primary data that were obtained in the same area, but in other ways like data based on robust statistically modelling, and under strict conditions, ensures practicality without compromising environmental integrity or overestimating emission reductions. Often using data that are collected systematically during harvest operations, and modelling statistically to evaluate impact parameters are a more efficient and reliable method. By the statistical analysis and comparison of data already collected during standard operations and the	The methodology developer agreed with the spirit of the proposal and engaged on flexible monitoring approaches, which were then refined through the review process. The comment is considered addressed, with the final module keeping the standard monitoring procedures in Section 5.2 to remain consistent with VM0035.

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		proposed monitoring methodology, reliability of data can be assured. p.16 "The project proponent must apply the impact parameter monitoring procedures detailed in this section or use alternative monitoring procedures that comply with the following requirements: - Methods applied demonstrate equal or greater accuracy than the monitoring procedures described in this module (e.g., remote sensing associated with high quality imagery, ...); PROPOSAL TO ADD after "....associated with high quality imagery, " =>", regression modelling of data from the project area for specific impact parameter, ...)". p.17 - Methods applied are more conservative than the monitoring procedures described in this module (e.g., alternative field measurements that yield more conservative value(s) for the same impact parameter(s)).” PROPOSAL TO ADD: 'If direct monitoring of an impact parameter cannot be performed using the prescribed or alternative methods, but robust alternative primary data, peer-reviewed studies, or empirical evidence show that the impact is below the crediting baseline, the parameter may be excluded from accounting. However, in such cases, no emission reductions may be claimed for that parameter, and it shall not be eligible for carbon crediting.' P.17. "Monitoring RIL-C impact parameters in the logging landscape of northern Congo involves accessing the annual harvest area, georeferencing and/or mapping skid trails, haul roads, and log yards; sampling skid trails for number of damaged trees; sampling the width of haul roads and the size of log yards; and sampling felled trees for collateral damage and log abandonment. A summary of required sample size is given in Table 4 below. Project proponents must adhere to the sample size requirements	

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		provided here." PROPOSAL TO ADD in the last sentence: " , unless they use alternative monitoring approaches as described above, excluding those parameters "from carbon crediting."	
15	Anonymous 2	• Page 16 (Section 5.2): "The purpose of monitoring is to generate primary data (original information collected directly from the with-project area) after each harvest which describe impacts of harvest on the residual stand, from which emission reductions can be estimated. Primary data may include a combination of field and remote measurements. Following completion of timber harvesting in the treatment area, all impact parameters from all logging emission source categories must be sampled to generate primary data, and the calculated impact parameters must utilize primary data." o Proposal to add: "the use of modelled data (or empirical studies) originating from within the project area is permitted for specific impact parameters only under the following conditions: (i) the impact parameter is excluded from crediting; (ii) available evidence shows that the parameter remains below the crediting benchmark or the project remains below the additionality benchmark; (iii) modelled data (or study) is based on field measurements from within 5 years of the target crediting year; and (iv) the estimated contribution of the impact factor to total emission reductions is less than 10%." o The rationale for this is as follows: it is often operationally and logistically challenging to monitor all impact parameters with the same primary data as described in the methodology, particularly for those parameters that contribute minimally to overall emission reductions. Allowing limited use of modelled and secondary data under strict conditions ensures practicality without compromising environmental integrity or overestimating emission reductions. • Page 16 (Section 5.2): "The project proponent must apply the impact parameter monitoring procedures detailed in this section or use alternative monitoring procedures that comply with the following requirements: - Methods applied demonstrate a greater accuracy than the monitoring procedures described in this module (e.g., remote sensing associated with	This comment is closely related to comment 14 and is addressed by the same response. The methodology developer considered the proposed conditions for alternative data, and the final module keeps the standard Section 5.2 monitoring procedures to ensure consistency with VM0035.

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		high quality imagery) or; - Methods applied are more conservative than the monitoring procedures described in this module (e.g., alternative field measurements that yield more conservative value(s) for the same impact parameter(s)." o Proposal to add: "If direct monitoring of an impact parameter cannot be performed using the prescribed or alternative methods, but robust alternative data, such as modelling results based on direct field measurements, peer-reviewed studies, or empirical evidence show that the impact is below the crediting baseline, the parameter may be excluded from accounting. However, in such cases, no emission reductions may be claimed for that parameter, and it shall not be eligible for carbon crediting." • Page 17 (Section 5.2) "Monitoring RIL-C impact parameters in the logging landscape of northern Congo involves accessing the annual harvest area, georeferencing and/or mapping skid trails, haul roads, and log yards; sampling skid trails for number of damaged trees; sampling the width of haul roads and the size of log yards; and sampling felled trees for collateral damage and log abandonment. A summary of required sample size is given in Table 4 below. Project proponents must adhere to the sample size requirements provided here." o Proposal to add: "… Project proponents must adhere to the sample size requirements provided here, unless they use alternative monitoring approaches as described above, excluding those parameters from carbon crediting."	
16	Wildlife Conservation Society	Please provide a definition for "treatment area" and what is meany by 'after each harvest.' Harvesting of multiple single blocks may happen within a year, but harvesting may occur continuously within a concession for many consecutive years. Should these terms be understood to correspond to the 'annual harvest area'?	The methodology developer removed the term 'treatment area', aligned it with Actual Harvest Area, and clarified that 'after each harvest' means completion of harvesting in the Actual Harvest Area. This resolves the ambiguity raised by the commenter.
17	Anonymous 4	The relevance of going out into the field to measure various data such as slope, damage classes, etc. because no analysis of the data to be collected	The methodology developer clarified that Appendix 3 is a baseline-

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		is specified in the module protocol or in the methodology and is never used in any equation, what is the purpose of these measurements? SKID parameter relating to skidding damage only. Network of skidding tracks mapped, but footprint and associated deforestation impact not taken into account in the monitoring protocol. Characterisation data for the AAC (see sheet appended to the proposed protocol) not used in the analysis of the data collected.	development protocol provided for information only and is not used by project developers, so the measurements of concern are not monitoring requirements. TNC also explained that SKID emissions are quantified as damaged trees rather than area, consistent with the established RIL-C module structure.

Section 6 – Data and Parameters

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#	Organization	Comment	Developer's Response
18	Anonymous 3	10. Fixed parameter justification: Default values such as CDBFELL1 (0.3319 tC/damaged tree) and FLBFELL2 (3.331 tC/ha) lack empirical justification specific to Congo Basin forests, as they are extracted from a single source of data that is not publicly available. These values significantly influence credit calculations and should be based on local measurements with proper uncertainty ranges. 11. Publication of source data: The raw data used to establish the parameters should be made public to allow independent verification and strengthen the credibility of the methodology. This should include all tree measurements, damage assessments, and geographical information.	The methodology developer responded to each point, confirming that CDBFELL1 and FLBFELL2 are derived from local empirical measurements with uncertainty ranges and explaining how outliers were treated. The methodology developer also justified the 40th percentile benchmark through a sensitivity review (25th–50th percentiles) and gave reasons for not adding stratification, log-yard waste or

Section 6 – Data and Parameters			
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		12. Intermediate calculations: The calculation steps to derive impact parameters should be documented in detail, with associated confidence intervals. For example, the 95% confidence interval for CDBFELL1 should be provided. 13. Statistical treatment of outliers: The methodology does not specify how potential outliers in the data were addressed. For instance, the ROC5 value for FELL1 (16.0) is significantly higher than other measurements and has a disproportionate effect on the mean value. 14. Unaccounted wood waste: The methodology fails to account for abandoned wood at log yards and trimmed butt sections during processing, which represent potentially significant sources of emissions not captured in the current parameters. 15. Growth Foregone: regarding the impact that unsustainable logging can have on tropical forests, compared to FSC certified RIL-C practices, it could be very interesting to account for the Growth Foregone in this methodology, giving an additional incentive to attract more timber companies. 16. Additionality benchmark rationale: The selection of the 40th percentile for the additionality benchmark (e.g., 5.9 for FELL1 compared to baseline 7.2) lacks clear statistical justification. Why not the 30th or 50th percentile? A sensitivity analysis showing the impact of different percentile choices on credit generation would strengthen this choice.	growth foregone at this stage. These explanations adequately address the comment.

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		17. Adaptive baseline/project emissions modelling: regarding forest and carbon stocks variability in tropics, should be based on a robust forest stratification. Develop adjustment factors based on local conditions (forest type, topography, logging season) to refine emission estimates while maintaining the simplified approach. This could take the form of factors (FELL1, SKID…) calculated for different forest strata within the northern Republic of Congo. Sampling effort should be done proportionally to the size of the forest stratum identified.	
19	Wildlife Conservation Society	HAULM,t references "undisturbed tree trunks." Can you clarify how this is determined? Is it Is this trees not meeting definition of 'damaged trees' For FELL2t, there should be a consistent definition of merchantable log, otherwise different companies will have different interpretations of this and it will cause issues with lack of comparability between the surveyed values and the benchmark.	The methodology developer clarified the HAULM,t corridor width in Section 6.2 as measured trunk-to-trunk between standing trees, resolving the 'undisturbed tree trunks' ambiguity. The FELL2t concern was addressed separately by adding a definition of 'Merchantable Log' to Section 3, so both parts of the comment are considered addressed.
20	Anonymous 3	18. Temporal sequence: Include procedures for monitoring post-logging recovery and adjusting carbon credits according to actual forest dynamics over time.	VM0035 conservatively ignores post-harvest regrowth and focuses on harvest-related impacts, so crediting is not adjusted for post-logging recovery. The methodology developer offered to add a monitoring protocol if required, and the module specifies

Section 6 – Data and Parameters			
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			monitoring procedures and timing in Section 5.2, so the comment is considered addressed.

Appendix 2 - Likelihood of Mortality arising from Various Types of Damage to Trees

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#	Organization	Comment	Developer's Response
21	Anonymous 3	"19. Mortality factor integration: Table A2.1 in Appendix 2 presents mortality rates for different types of damage, but the module does not explicitly document how these rates are incorporated into the calculation of CDBFELL1 and CDBSKID values. This critical link should be transparent and reproducible. Furthermore, there is no justification to use mortality rates calculated in the context of Peru to the forest of the Republic of Congo. 20. Below-ground biomass inclusion: The parameters CDBFELL1, FLBFELL2, CDBSKID, and FBunlogged all include below-ground biomass (BGB) in their calculations, but this is not clearly documented in the module. The methodology for converting above-ground to below-ground biomass should be explicitly described, including any allometric equations or conversion factors used."	The methodology developer addressed both points by adding a worked description in the appendix of how mortality factors feed into CDBFELL1 and CDBSKID. TNC also documented the belowground biomass conversion (AGB × 0.235, Mokany et al. 2006). The use of Peru-derived mortality rates was further justified during the review, so the comment is considered addressed.

Appendix 3 - Field Methods: Carbon Emissions from Logging Operations in the Republic of Congo

Appendix 3 - Field Methods: Carbon Emissions from Logging Operations in the Republic of Congo			
#	Organization	Comment	Developer's Response
22	Anonymous 3	21. Appendix 3 describes measurement procedures whose randomness can be easily manipulated to lessen the impact of harvesting on the felling area. For example, the randomly selection of the 3 adjacent and recently-closed cutting blocks, the location of 50-hectare for "sub-sample", or using "heads or tails of a coin and flip the coin" to determine which log landings to measure. Given the impact it has on the results, it would be necessary to establish mechanisms that ensure that random measurements really are, for example, through simple systems that record all possible options, number of selection attempts and results obtained records. These records would make it easier for a VVB to verify that the PP was indeed random by establishing the samples. 22. Related to the previous point, the appendix could include measurements that will indicate what, how and where the parameters were measured in the field by the monitoring crew on a semi-permanent basis, for example, placing beacons at the corners of the 50-meter squares, marking damaged trees with paint or tapes, indicating the skid trails measured, etc. In this way, a VVB could check if they were measured according to the procedures (e.g. if all the damaged trees were identified, if the square was correctly bounded, etc. 23. The relevance of some aspects to be measured in the field is not clear (such as slope, damage classes, characterization of the AAC, etc.), since it is information that is not used later and yet adds workload to the monitoring crew. It is recommended to justify the purpose of collecting such information.	The methodology developer clarified that Appendix 3 was used only for baseline development and is not the monitoring protocol, so its randomization steps cannot be gamed to affect crediting. Monitoring requirements are set out in Section 5.2, and the methodology developer 's clarification also explains why the additional field measurements are not required of project developers.
23	Anonymous 4	The 50ha sampling and sub-sampling method in the measurement protocol does not appear to be biased and easily substitutable,	The methodology developer explained that Appendix 3 applies

Appendix 3 - Field Methods: Carbon Emissions from Logging Operations in the Republic of Congo			
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		which considerably reduces the confidence index of the data to be collected as a whole. It would be necessary to establish a recognised method limiting the level of risk. Some methods that allow random selection of the measurements to be made present very high risks of uncertainty and potential bias, as in Section C - Log Landing Dimensions 'Choose heads or tails of a coin and flip the coin. If the side of the coin chosen is successful, then begin at the first log landing that is encountered. If it is not successfully chosen, begin measurements at the second log landing encountered. More robust methods should be applied.	only to baseline development, where there is no financial incentive to bias the sampling. Because crews measured every Xth stump, manipulating a single random selection would not bias the overall sample, so the comment is considered addressed.