REVISION TO VM0007: REDD+ METHODOLOGY FRAMEWORK

FIRST ASSESSMENT REPORT

Document Prepared By: Environmental Services, Inc.

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Summary:

Environmental Services Inc. was commissioned by Permian Global Research Ltd to perform the first methodology revision assessment of VM0007 REDD Methodology Modules in accordance with the VCS Methodology Approval Process, VCS Standard, VCS Program Guide, and the VCS AFOLU Requirements.

The VM0007 methodology provides a series of modules and tools which form the basic framework for a complete REDD baseline and monitoring methodology. The modules, when used together quantify GHG emission reductions and removals from REDD project scenarios including avoiding unplanned (AUDD) and planned deforestation (APD), and for activities to reduce emissions from forest degradation. It now includes modules for afforestation, reforestation and Revegetation activities (ARR) and for activities which occur on peatlands and are combined with peatland rewetting or conservation (WRC). Identification of the most plausible VCS eligible activity is guided by a decision tree located in the REDD+MF module which provides the overarching structure for implementation of the VM0007 Methodology.

The purpose and scope of the methodology element first assessment was to evaluate whether or not the revisions to the methodology element were prepared in line with VCS program requirements. ESI's assessment included a detailed review of eligibility criteria, baseline approach, additionality, project boundary, emissions, leakage, monitoring, data and parameters, and adherence to the project level principles of the VCS program (relevance, completeness, consistency, accuracy, transparency and conservativeness). ESI's assessment also included a detailed analysis of the methodology, literature reviews, technical reviews and Permian's responses to all non-conformity reports (NCR's), clarifications (CL's) and opportunities for improvement (OFI's).

The ESI assessment team identified 144 NCR's/CL's/OFI's. All were addressed satisfactorily by Permian during the methodology assessment process. These NCR's and CL's provided necessary clarity to ensure that the methodology was in compliance with VCS rules and requirements.

ESI confirms all methodology assessment activities, including objectives, scope and criteria, level of assurance and the methodology adherence to the VCS Program and VCS Standard Version 3, as

documented in this report, are complete. ESI concludes without any qualifications or limiting conditions that the revised methodology element (VM0007 REDD Methodology Modules) meets the requirements of the VCSA. ESI recommends that VCSA approve the revisions to the methodology element.

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1 Introduction

1.1 Objective

This methodology first assessment was performed to evaluate the likelihood that implementation of the methodology would result in accurate calculations and appropriate eligibility criteria for GHG emission reduction/removal (ISO 14064-3:2006). This report summarizes the findings of the first methodology assessment of the Verified Carbon Standard (VCS) double approval process for a methodology element framework, hereafter referred to as the "Methodology" and consisting of individual methodology components, hereafter referred to as "Modules". Permian Global Research Ltd., referred to as the "Methodology Developer", has commissioned Environmental Services Inc. (ESI), referred to as the "Assessment Team" to perform an assessment of revisions to VM0007 Methodology Modules.

This report presents the findings of a qualified assessment team of auditors and experts in methodologies for GHG emissions or who have assessed the methodology and modules for compliance under the applicable rules of the Verified Carbon Standard. Section 3 below provides the assessment methods and criteria. Section 2.5 presents summary findings of the methodology assessment and Appendix B provides details of individual findings.

1.2 Summary Description of the Methodology

The VM0007 methodology provides a series of modules and tools which form the basic framework for a complete REDD+ baseline and monitoring methodology. The modules and tools were developed to work together for the purpose of quantifying GHG emission reductions and removals from avoiding unplanned (AUDD) and planned deforestation (APD), as well as afforestation, reforestation and revegetation activities (ARR), and for activities which occur on peatlands and are combined with peatland rewetting or conservation (WRC). Identification of the most plausible VCS eligible activity is guided by a decision tree located in the REDD+MF module which provides the overarching structure for implementation of the VM0007 Methodology.

2 Assessment Approach

2.1 Method and Criteria

This assessment is based upon standard auditing techniques in line with VCS Requirements to assess the correctness of the information provided. In accordance with VCS rules, a methodology assessment encompasses applicability conditions, project boundary, procedure for demonstrating additionality, procedure for determining baseline scenario, baseline emissions, leakage, quantification of net GHG emission reduction and/or removals, monitoring, data and parameters, and relationships to approved or pending methodologies. Per section 6.2 of the Methodology Approval Process, the scope of this methodology revision assessment encompassed the revised modules as well as how they fit into the broader VCS VM0007 Methodology. Further, the assessment team evaluated whether any provisions of the methodology might have impacted by the proposed revisions.

The criteria will follow the VCS program documents located at *http://v-c-s.org/program-documents*. These documents include the following:

- VCS Program Guide (v3.5, October 2013)
- VCS Standard (v3.4, October 2013)
- Program Definitions (v3.5, October 2013)
- Agriculture, Forestry and Other Land Use (AFOLU) Requirements (v3.4, October 2013)
- Methodology Approval Process (v3.5, October 2013)
- Guidance for Standardized Methods (v3.3, October 2013)

2.2 Document Review

The VM0007 revised methodological modules were submitted to Environmental Services Inc. on July, 2013. The assessment team performed a detailed review of the modules against the criteria of the VCS guidance documents listed in Section 3.1. Other items the assessment team reviewed were completeness, logical coherence, and consistency with current best practices for quantification of emissions reductions.

Prior to the preparation of the Assessment Plan, the criterion determining the revised/extended methodology was outlined by the methodology developer and was reviewed against the requirements of VCS. The following table consists of modules that have been updated and/or added (*):

Name	First version assessed	Final version assessed
"REDD Methodology Framework" - REDD+MF	REDD+MF 20130703.docx	REDD+MF 20140904.docx
"Estimation of baseline carbon stock changes and greenhouse gas emissions in ARR project activities on peat and mineral soil" – BL-ARR*	BL-ARR 20130703.docx	BL-ARR 20140821.docx
"Estimation of baseline soil carbon stock changes and greenhouse gas emissions in peatland rewetting and conservation project activities" – BL-PEAT*	BL-WRC_20130703.docx	BL-PEAT 20140904.docx
"Estimation of emissions from activity shifting for avoided planned deforestation" – LK-ASP	LK-ASP 20130703.docx	LK-ASP 20140904.docx
"Estimation of emissions from activity shifting for avoided unplanned deforestation" –	LK-ASU 20130703.docx	LK-ASU 20140904.docx

LK-ASU		
"Estimation of emissions from market effects" – LK-ME	LK-ME 20130703.docx	LK-ME 20140904.docx
"Estimation of emissions from displacement of pre-project agricultural activities" – LK-ARR*	LK-ARR 20130703.docx	LK-ARR 20140904.docx
"Estimation of emissions from ecological leakage" – LK-ECO*	LK-ECO 20130628.docx	LK-ECO 20140904.docx
"Estimation of greenhouse gas emissions from biomass and peat burning" – E-BPB	E-BPB 20130703.docx	E-BPB 20140704.docx
"Methods for monitoring greenhouse gas emissions and removals in ARR project activities on peat and mineral soil" – M-ARR*	M-ARR 20130703.docx	M-ARR 20140704.docx
"Methods for monitoring of soil carbon stock changes and greenhouse gas emissions and removals in peatland rewetting and conservation project activities" – M-PEAT*	M-WRC_20130703.docx	M-PEAT_20150129.docx
"Methods for stratification of the project area" – X-STR	X-STR_20130703.docx	X-STR_20140819.docx
"Estimation of uncertainty for REDD+ project activities" – X-UNC	X_UNC 20130703.docx	X_UNC 20140904.docx

The methodology uses the external T-ADD "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". The tool was designed for A/R CDM activities and was previously adapted for use in this methodology because it is a robust method for determination of the most likely baseline scenario. Methodology developers indicate if there is a conflict between the CDM tool requirements and VCS rules that VCS rules are to be followed.

See Appendix A for a complete listing of documents received and reviewed.

2.3 Interviews

The objective of the interview process was to resolve requests for clarifications, corrective actions and other outstanding issues which were required as part of the methodology revision assessment. After issuance of a round of NCRs/CLs, conference calls between the assessment team and the authors were arranged to reconcile understanding of the issues. As a guarantee of

transparency in the resolution process, concerns raised and responses given were documented in greater detail, given in Section 3.5.

The official opening meeting was conducted on 15 August 2013 between representatives from the methodology developer with authority to approve the Methodology Assessment Plan; the Lead Validator and Forestry, Carbon, and GHG Services Director from ESI. The agenda of the meeting consisted of review and mutual understanding of the components in the Methodology Assessment Plan including potential revisions, project timeframes and the standardized processes to solicit feedback from parties.

After confirmation of the Assessment Plan, the methodology assessment audit process commenced and lead to a Round 1 of Non-conformance Reports (NCRs), Clarification Requests (CLs), and Opportunities for Improvement (OFIs). Additional interviews were arranged, as needed, after the authors addressed NCRs/CLs in subsequent versions of the methodology and reviewers required additional clarification on changes applied. The table below lists the individuals involved in the major meetings and their organizational affiliation for this first methodology assessment.

2.4 Assessment Team

The assessment team consisted of qualified individuals linked to the sectoral scope and technical areas of the methodology. The composition of the assessment team operated at several qualification levels:

- Lead Assessor (L)
- Assessment Team Member (TM)
- Assessment Expert (E)
- Assessment QA/QC (QA/QC)

Team Member	Expertise/Experience
Shawn McMahon (L)	Senior Project Manager, Lead Assessor. Approved to conduct third-party carbon sequestration validations and verifications under VCS. Specializes in third-party carbon offset validations and verifications, carbon sequestration project development, development and implementation of management plans for enhancement of carbon stocks, development of carbon and environmental asset tracking programs, and team management.
Dr. Guy Pinjuv (TM)	Senior Scientist, Lead GHG Validator/Verifier. Expertise lies in forest carbon growth modeling, carbon project development, forest offset project validation and/or verification and forestry related methodology assessments. Responsible for team management, client coordination, and performance of senior technical project management. Climate Action Reserve Forest

	and Urban Forest Project Lead Verifier.
Stewart McMorrow (TM)	Senior Scientist. Responsible for project management, client coordination and technical aspects; vegetative community characterizations, mitigation area monitoring studies, forest inventories and assessments, and GHG validations/verifications associated with agricultural, forestry and other land use sectors.
Richard Scharf (TM)	Senior Soil Scientist, NCLSS, SC Soil Classifier. Over twenty-two years of experience in a variety of soils-related projects. Duties include managing and conducting soils work for wastewater projects, stormwater projects and wetland delineation. Provides expertise and experience on carbon offset projects/methodologies associated with agricultural land management and/or soil carbon pools.
Caitlin Sellers (TM)	Senior Scientist. Responsible for project management and client coordination; technical services such as wetland delineation, wetlands and wildlife permitting, vegetative community characterizations, mitigation area monitoring studies, forest inventories and assessments, and GHG validations/verifications. Certifications: Climate Action Reserve – Forest and Urban Forest Project Lead Verifier, Climate Action Reserve – General Project Verification, California Air Resources Board – Lead Verifier, Executive Order H2-12-137.
Jonathan Pomp (TM)	Project Forester. Specializes in carbon offset consulting, design and implementation, quantification & analysis, marketing, strategy development, project development, and verification. Responsible for GHG forestry offset project validations/verifications, forest biometrics, and field assessments for projects around the world.
Matthew Perkowski (TM)	Project Forester and Forest Biometrician. Responsibilities include meeting the internal and external client objectives in the fields of forest inventory and sampling, growth and yield modeling, and directly in support of offset validation/verification projects. In addition, he is focusing on streamlining and developing quantitative tools for the GHG group to increase product service value for clients.
Eric Jaeschke (TM)	Project Forester and Remote Sensing Specialist. Duties include technical GIS and remote sensing support for carbon offsetting projects through validations/verifications under various rule sets, data analysis and field validations.
Dr. John Kimble (E)	VCS-AFOLU ALM Expert/Assessment Team Member. National and international responsibility with a broad research assignment with work related to global climate change and carbon sequestration and to the areas of soil survey. This work was related to conservation practices, reduced water and wind erosion, measurement, and verification of carbon fluxes. In this methodology assessment Dr. Kimble provided technical expertise for AFOLU-ALM and review for the methodology revision

	validation.
Dr. Carly Green (E)	VCS-AFOLU PRC Expert/Validation Team Member. Independent Expert for Peatland Rewetting and Conservation (PRC) component of methodology assessment. Conducted due diligence on VCS projects and has completed over 2500 hours of lead auditing against the Verified Carbon Standard across a diverse range of International forestry and agricultural projects. In this methodology assessment Dr. Green provided technical expertise for AFOLU-PRC related modules and review for the methodology revision validation.
Steve Ruddell (E)	VCS-AFOLU REDD Expert/Validation Team Member. Principal and founder of CarbonVerde, LLC. Approved VCS AFOLU Expert for conducting validations of IFM and REDD methodologies. Qualified VCS, ACR, and CCB validator and verifier. Works with project developers and private equity firms on the feasibility and development of Improved Forest Management, Avoided Conversion, Afforestation/Reforestation, and REDD forest carbon projects to the requirements of the VCS. In this methodology assessment Steve Ruddell provided technical expertise on REDD and review for the methodology revision validation.
Janice McMahon (QA/QC)	GHG Services Division Director for ESI. Specializes in natural resource management projects including carbon sequestration feasibility assessments, development/implementation of management plans for enhancement of ecosystem services, assessment of GHG emissions and reductions, development of environmental asset tracking programs, GHG validations and verifications, endangered/ threatened species assessments, habitat management plans, and integrated ecosystem services plans. Responsible for leading the Forestry, Carbon, and GHG Services Division, which includes client and team coordination, proposal preparation and review, marketing presentations, maintenance of ESI's ANSI accreditation and management System, and quality assurance and quality control for projects in the United States as well as the international market.

2.5 Resolution of Findings

The process of methodology revision assessment involved 3 formal rounds of evaluation by the assessment team and resulted in a methodology version which was in conformance to VCS rules. Findings related to corrective action, clarification requests or other findings were resolved during communication between the assessment team and the methodology developer. More specifically, where noted by the assessment team, the methodology developer implemented corrective actions by amending methodology modules and providing written clarification responses. Types of findings were characterized in the following manner:

Non-Conformance Reports (NCRs) were issued as a response to material discrepancies in a part of the methodology and generally fell into one of the following categories:

- Non-conformance to a VCS guiding document listed in Section 2.1
- Internal consistency among modules was lacking
- Mathematical formulae in modules were incorrect
- Additional information was required by the assessment team in order to confirm reasonable assurance for compliance

Clarifications (CL) were issued when language within a module needed extra clarification to avoid ambiguity.

Opportunities for Improvement (OFI) were issued to the methodology developer when an opportunity for improvement was identified.

During the course of the methodology revision assessment, 144 NCRs, CLs, and OFIs were identified. All NCRs/CLs were satisfactorily addressed. The NCRs/CLs provided necessary clarity to ensure the project was in compliance with the requirements of the VCS for GHG projects and the selected methodology. Detailed summaries of each finding, including the issue raised, responses and final conclusions are provided in Appendix B. Selected important findings and points of discussion from all components of the methodology assessment are presented in the table below.

Finding/Discrepancy	**Resolution**
Unclear on source of methods used to estimate uncertainty, "Methods used for estimating uncertainty shall be based on recognized statistical approaches such as those described in the IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. "	Methodology developer referred to the requirement (IPCC principles Section 4.1.4) during this methodology validation. This suffices to confirm that the principles in the IPCC guidance have been adopted per VCS Standard section 4.1.4.
Methodology developer did not identify default factors which may become out of date (i.e., those default factors that do not represent physical constants or otherwise would not be expected to change significantly over time). Such default factors are subject to periodic re-assessment, as set out in VCS document	Default factors established in the methodology (tools M-WRC, E-BRP, LK-ASP, LK-ASU, LK-ME, and X-STR) that may become out of date, and are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process were appropriately identified per VCS Standard section 4.1.7.

Methodology Approval Process.	
Methodology did not explicitly state which type of method was used to determine additionality and/or the crediting baseline (i.e., performance method, activity method, or project method).	The REDD+MF module section 2 now contains a table that clearly indicates the method of determining additionality and baseline in compliance to the VCS Standard section 4.1.9.
The frequency of monitoring and description of measurement for all parameters in module M-WRC and M-ARR was not provided.	The frequency of monitoring and description of measurement for all parameters are provided in formatted modules such as M-Peat, section 6.2 Data and Parameters Monitored. The criteria and procedures for establishment of frequency of monitoring now comply with the requirement contained in the VCS Standard section 4.8.5 (4).
The revised modules did not explicitly state that the standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality are publicly available and come from a reputable and recognized sources (i.e., IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry)	Language has been added to Chapter 7 of REDD+-MF and Chapter 5 of BL-PEAT to indicate that standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality are publicly available and come from reputable and recognized sources per AFOLU Requirements section 4.1.2.
The model for parameters Ratepeatloss-BSL,i,t and Ratepeatloss-WPS,i,t in Module X-STR was not well described in terms of calibration and measurement methods.	Module M-WRC section1.6 now describes monitoring soil subsidence (Rate_subs and P_burndepth). An appropriate addition has been made to Module X-STR section 3 to clarify that the Rate_peatloss constitutes the sum of Rate_subs and P_burndepth (from M-WRC) per AFOLU Requirements section 4.5.3.
Neither the REDD+MF framework nor the BL-ARR module specified that the project area shall not be cleared of native ecosystems within the 10 year period prior to the project start date.	The procedure outlined in WRC in REDD-MF is now in line with module ARR Section 5.1 per AFOLU Requirements section 4.2.1. An appropriate note was added to BL-ARR indicating that VCS rules supersede CDM rules.
A discussion of how microtopography will be considered in module BL-WRC was needed.	Microtopography was appropriately inserted as a possible proxy for baseline emissions (BL-Peat, section 5.3) and as an indicator for stratification (X-STR, section 5(3)) per AFOLU Requirements section 4.5.27.

A demonstration was needed of how the methodology describes the criteria and procedures, including relevant equations, for the quantification of GHG emissions and/or removals for the selected GHG sources, sinks and/or reservoirs for the project.	Text has been added to section 8.2 of VCS Methodology VM0007 addresses the VCS Methodology Template Requirement 8.2.
The X-STR module stated that the area of channels and ditches (Aditch-WPS for the project scenario and Aditch-BSL for the baseline scenario) must be quantified, but not explicitly mapped. It was not clear how the area of channels and ditches can be quantified without mapping them. It was also unclear how emissions from ditches and drains are to be monitored and accounted for in the baseline and project scenarios.	The correct reference to the wetlands supplement has been added. The guidance provided specifically states that the canals 'must be quantified and expressed as portion of the project area (cf. IPCC 2013 – Section 2.2.2.1), but not explicitly mapped. Further, methodology developers must demonstrate that no drainage has occurred (this could possibly be demonstrated via mapping, but the methodology is not prescriptive in what can be deemed as demonstration). General technical expert finding by Carly Green.
BL-WRC module section 5.5 stated that baseline fire frequency and impact can be assessed using historic data which should be gathered over 10-15 year period ending 2 year before the project start date and that procedures are provided in M-WRC. However, Section 1.4 of M-WRC refers the reader to E-BPB and there was no other reference in M-WRC regarding the historical data approach to assessing the impact of fire; only the FRP approach was described in detail. E-BPB did not provide any guidance on the historical data approach to defining the frequency and impact of fires and so this approach appeared not to be described in any modules.	Additional clarifying text was included to provide a maximum and minimum time period which bounds the historical reference period more clearly. The project developer indicated “if a period of 10 to 15 years needs to be analysed ending 2 years before the start date, these periods should begin 12 to 17 years before the start date.” In the absence of specific guidance from VCS it is consistent in the minimum with other VCS methodologies and current thinking in REL development and allows flexibility for cloud cover issues and emerging jurisdictional programs. General technical expert finding by Carly Green. In a related discussion, the project developer confirmed that the intention of the historical time frame for fire was not to develop a “trend”, but to assess the “actual percentage of area burnt” over the reference period (because it must exceed 10% to qualify).
In the REDD+MF framework module it is stated that "ARR activities shall not enhance peat oxidation and therefore this activity requires at least some degree of	Methodology developer added to Section 5.6: “The methodology developer must provide evidence that the applicability conditions of the methodology regarding the water table depth are

rewetting"; however, the procedures to capture the relationship of GHG emissions and water table depths in this case were not clear. It was unclear how the modules present a methodology that ensures ARR or REDD activities on peat will not lead to a lowering of the water table.	met by monitoring the water table depth, for which procedures are provided below." In M-PEAT module the following text was added, "The methodology developer must provide evidence that the applicability conditions of the methodology regarding the water table depth are met by monitoring the water table depth, for which procedures are provided below." The project developer response clearly shows that the project will not meet the applicability criterion if the water table is lowered, and that the monitoring requirements are sufficient to capture any lowering of the water table. General technical expert finding by Carly Green.
For unplanned deforestation (AUD), this applicability condition had been removed, "It shall be demonstrated that post-deforestation land use shall not constitute reforestation."	Project developer noted that due to a change in the AFOLU requirements this applicability condition is not relevant anymore and APD projects may have a baseline that constitutes deforestation (e.g. conversion to plantations). However as this requirement is intended only for AUD (avoided unplanned deforestation) project types, it is relevant to keep this applicability condition and as a result it was reinserted.

3 Assessment Findings

The proposed revisions to the VM0007 methodology element were found to be in full compliance with the principles set out in the VCS Standard and other VCS rules and requirements. The new modules and revisions enlarge the eligible environments and activities to be more broadly applicable for a variety of project types including activities on peat soils. New baseline, leakage, and monitoring modules are consistent with best practice and scientific consensus by following previously validated methods for determining emissions. The assessment team evaluated adherence of the methodology to the VCS Standard and further concluded that the methodology references specific VCS approved modules. Applicable VCS approved tools are appropriately invoked for determining project significance, baseline, additionality and risk.

The assessment addressed specific issues that arose in the methodology which are pertinent to the principles set forth by the VCS Standard, including relevance, completeness, consistency, accuracy, transparency, and conservativeness.

3.1 Relationship to Approved or Pending Methodologies

The methodology and revision and accompanying modules fit into the modular framework where modules are interchangeable among various approved VCS methodologies. The revision is directly related to previously approved versions of the methodology VM0007 v.1.3 and builds upon a strong modular structure.

3.2 Stakeholder Comments

No stakeholder comments were received for the revision of the VM0007 REDD Methodology. Modules were posted for public comments from 8 August to 7 September, 2013.

3.3 Structure and Clarity of Methodology

The VM0007 REDD Methodology Modules were reviewed by the assessment team for clarity and logical consistency in accordance with VCS rules for methodology assessments (Methodology Approval process v3.4 October 2012). Methodology developers have followed the VCS templates closely and have included the specific criteria and procedures in the appropriate sections. The terminology used in the revised methodology element is consistent with the VCS Program and GHG accounting and language chosen is precise. Definitions are defined at the beginning of modules to reference the reader. Specific key terms were used appropriately; must, should, and may to indicate a firm requirement and permissible or allowable options, respectively. Key words for outlining mandatory requirements are used consistently for permissible or allowable options. Criteria and procedures for the methodology were written by the methodology developers in a clear, concise and coherent manner to allow the project to be unambiguously audited by the assessment team. The notation of the methodology makes sufficient use of VCS rules and procedures. Overall, it is of the assessment team's opinion that the structure of the document meets the strict requirements of the VCS Program.

3.4 Definitions

The key terms defined in the methodology element modules are presented clearly and appropriately in a definition section at the beginning of the document for ease of use by methodology developers. The comprehensive list of terms relevant to the methodology is ordered alphabetically and definitions for acronyms are provided. Definitions of key terms are presented concisely and assist the reader in comprehension for effective implementation of the methodology.

3.5 Applicability Conditions

The methodology includes the following project category level applicability conditions to ensure adherence to VCS rules and requirements, and to address specific issues that arose in the methodology assessment process. This assessment determined that the applicability conditions contained within the methodology are appropriate, adequate and in compliance with the VCS rules. The following table summarizes applicability conditions as written, changes made during the revision of the methodology, and the final evaluation of those changes during the assessment.

Applicability Conditions (REDD+MF)	**Assessment Team Findings**
a. <u>All activity types</u>	
All land areas registered under the CDM or under any other carbon trading scheme (both voluntary and compliance-oriented) must be transparently reported and excluded from the project area.	The methodology ensures land areas are transparently reported in compliance of AFOLU Requirements and this applicability condition is sufficiently clear to determine if a project meets the condition.
b. <u>REDD activity types</u>	
Unplanned deforestation: Baseline agents of deforestation shall: (i) clear the land for settlements, crop production (agriculturalist) or ranching, where such clearing for crop production or ranching does not amount to large scale industrial agriculture activities (ii) have no documented and uncontested legal right to deforest the land for these purposes; and (iii) are either resident in the Reference Region for Deforestation (cf. section 1 below) or immigrants. Under any other condition this framework shall not be used.	This applicability condition is written in a clear and precise manner to ensure that projects are able to properly evaluate whether baseline agents for unplanned deforestation are appropriate for the methodology.
Planned deforestation/degradation: Conversion of forest lands to a deforested condition must be legally permitted.	This applicability condition addresses the practicality of project activities and is written in such a manner so as projects are not able to fall out of line of the condition.
Where, pre-project, unsustainable fuelwood collection is occurring within the project boundaries modules BL-DFW and LK-DFW shall be used to determine potential leakage	The applicability condition is practical to include in order to account for fuelwood carbon loss and is written sufficiently clear to determine if a project meets the condition.
Degradation (fuelwood/charcoal): Fuelwood	The applicability condition is practical to

collection and charcoal production must be "non-renewable" (as defined in Module BL-DFW) in the baseline period. If degradation is caused by either illegal or legal tree extraction for timber, this framework cannot be used.	include in order to account for carbon loss due to baseline forest degradation. The applicability condition allows for a demonstration of conformance at time of project validation and ensures projects are unable to fall out of line with the condition.
c. ARR	
Procedures for estimating carbon stock changes in ARR project activities are provided in BL-ARR and M-ARR. Where exclusion of project activities on wetlands exist in the applicability conditions of methodologies and tools, these can be neglected for the purpose of their use within this Methodology Framework, as accounting procedures for the peat soil are provided in BL-PEAT and M-PEAT. The with-project scenario does not involve the harvesting of trees. Therefore, procedures for the estimation of long-term average carbon stocks are not provided. The with-project scenario does not involve the application of nitrogen fertilizers.	This applicability condition is written in a sufficiently precise manner to direct projects to use of the appropriate modules for estimating carbon stock changes in ARR project activities. Further, AFOLU Requirements section 4.2.20.2 specifies ARR activities involving nitrogen fertilization are not eligible project activities.
d. WRC	
Fire reduction projects on peatland that exclude rewetting as part of the project activity are not eligible. Rewetting of drained peatland and conservation of undrained or partially drained peatland may be implemented in combination with REDD project activities. REDD project activities on peatland shall not increase drainage. Rewetting of drained peatland may be implemented as a separate activity or in combination with ARR project activities. ARR activities shall not enhance peat oxidation and therefore this activity requires at least some degree of rewetting.	This condition is consistent with and ensures that a project satisfies all the requirements in AFOLU sections 4.2.16 - 4.2.19. The methodology developer chose to address peatland rewetting exclusively and allows it to be combined with the ARR criteria. See also AFOLU Requirements v3.2 for specifics on subcategories for rewetting drained peatlands (RDP) and conservation of undrained and partially drained peatlands (CUPP). Per AFOLU-WRC section 4.6.20 there can be no significant hydrological effect on adjacent lands, either by using a large enough buffer or physical barriers. The water table depths in adjacent lands will be monitored to detect ecological leakage.

3.6 Applicability Condition Amendments

As a result of revisions to the methodology, the applicability conditions were amended among modules to ensure consistency and to evaluate potential implications to the existing methodology. The following applicability condition changes are presented.

Applicability Condition	Assessment Team Findings
Land in the project area has qualified as forest at least 10 years before the project start date.	This applicability condition was moved under a new heading b. REDD
Baseline deforestation and baseline forest degradation in the project area fall within one or more of the following categories: -Unplanned deforestation (VCS category AUDD); -Planned deforestation (VCS category APD); -Degradation through extraction of wood for fuel (fuelwood and charcoal production) (VCS category AUDD).	This applicability condition was moved under a new heading b. REDD
Methodology developers must be able to show the project area and ownership of carbon rights for the project area at the time of verification.	This applicability condition was removed as it is irrelevant for baseline and monitoring methodologies.
Baselines shall be renewed every 10 years from the project start date.	This applicability condition was moved under a new heading b. REDD
If land is not being converted to an alternative use but will be allowed to naturally regrow (i.e. temporarily unstocked), this framework shall not be used.	No requirement warrants this applicability condition, so it was removed from the methodology
Leakage avoidance activities shall not include: -Agricultural lands that are flooded to increase production (e.g. paddy rice); -Intensifying livestock production through use of “feed-lots” and/or manure lagoons.	This applicability condition was moved under a new heading b. REDD
It shall be demonstrated that post-deforestation land use shall not constitute reforestation.	This applicability condition was initially removed due to a change in the AFOLU requirements but subsequently reinserted during the assessment. APD projects may have a reforestation baseline and therefore

	suitable for the avoidance of conversion of natural forest to plantation forest. This requirement is intended for AUD (avoided unplanned deforestation) project types and it was deemed relevant to keep this applicability condition.
Documentation must be available to clearly demonstrate with credible evidence and documentation that indeed the land would have been converted to non-forest use if not for the REDD project.	Due to a change in the AFOLU requirements this applicability condition is no longer relevant and baseline assumptions are covered in module BL-PL.

3.7 Project Boundary

The VCS Standard requires that the methodology establish criteria and procedures for describing the project boundary and identifying and selecting optional carbon pools, i.e. sources, sinks, and reservoirs relevant to the baseline and project scenarios. Procedures to quantify emissions are appropriately included in all new and revised methodology modules for all relevant pools and sources.

The methodology appropriately addresses the establishment of spatial, temporal and gaseous boundaries to meet VCS AFOLU Requirements for REDD, ARR, and WRC project categories and applicable to AUDD, APD, Degradation (fuelwood/charcoal) project scenarios. Mandatory and optional pools in this methodology are confirmed suitable based on the choosing of appropriate modules for a project specific methodology.

The spatial boundaries in this methodology were assessed for conformance to VCS rules and found to be sufficiently detailed, appropriate, and adequate for project scenarios and in compliance with AFOLU Requirements section 4.2.14. Similarly, temporal boundaries were reviewed within the context of VCS rules and found to detailed and sufficient. The methodology further defines temporal boundaries according to project category for historical reference period, project crediting period, and monitoring period. Significant sources of gaseous emissions accounted for are in compliance with AFOLU Requirements sections 4.3.19, 4.3.20.

The methodology allows for flexibility in selecting carbon pools depending on project category and associated scenario or otherwise demonstrable conservative exclusion. The assessment team evaluated the appropriateness of mandatory or optional carbon pools and sources of GHG for project scenarios under the methodology and determined the project developers' choices were justified. The assessment team concludes that procedures outlined in the methodology for selection of pools, sources, sinks, and reservoirs are clearly specified and suitable for the project activities covered by the methodology.

3.8 Baseline Scenario

Determination of the most likely baseline scenario for all project activities eligible under this methodology is performed using the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities" (latest CDM-EB approved version). The tool contains steps to select the most conservative baseline scenario depending on the amount of information available to generate baseline estimations. Applying the CDM tool appropriately allows for transparent identification of baseline scenarios and encourages conservative baseline net greenhouse gas removals by reductions. The tool has been designed for A/R CDM project activities, and therefore a crosswalk is provided in the methodology to assist methodology developers for interpretation to VCS terms. Methodology developers clarified that in case of conflict between the CDM tool requirements and VCS rules, then VCS rules should be followed as outlined in AFOLU Guidance: "Additional guidance for VCS Afforestation, Reforestation and Revegetation projects using CDM Afforestation/Reforestation Methodologies."

During the course of assessment, methodology developers chose to eliminate the existing approved VCS "Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Activities" and instead switch to the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". Although the tool was developed by CDM specifically for use with only Afforestation/Reforestation activities, the tool is also appropriate for use with REDD and WRC activities. Methodology developers explained that the VCS tool lacks procedures for the selection of the most likely baseline scenario and in this respect the CDM tool is a more complete method.

Recent updates (8 October 2013) to the VCS program resulted in expansion of the decision tree for determining the baseline type to include the IFM components of certain baselines. As this methodology does not address the IFM project category, this particular update was not appropriate. The methodology appropriately recommends reassessment of the baseline scenario for all project activities every 10 years. A reassessment of the baseline scenario under each AFOLU category is designed to capture changes in the drivers and/or behaviour of agents that cause the change in land use and/or land management practices and thus changes in carbon stocks. For REDD and WRC project activities, *ex-ante* baseline projections beyond a 10-year period are appropriately not required. The methodology developers further establish that the historic reference period is extended to include the original reference period and all subsequent monitoring periods up to the beginning of the current monitoring period.

3.9 Additionality

The methodology satisfies VCS Requirements for providing a procedure to demonstrate additionality by requiring projects to use the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities" (latest CDM-EB approved version). The CDM tool provides steps to assess additionality through the evaluation of alternative and proposed project scenarios. Default factors and standards as stated in the methodology were critically evaluated within the scope of this assessment to ensure values used were from a publically available, recognized source such as the *IPCC 2006 Guidelines for National GHG Inventories* or the *IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and*

Forestry. In summary, the assessment team concludes that the procedures for demonstrating additionality are appropriate, adequate and conform to VCS rules.

3.10 Quantification of GHG Emission Reductions and Removals

3.10.1 Baseline Emissions

Procedures for quantifying the baseline emissions for REDD, ARR, and WRC project activities are determined by baseline type and selected carbon pools per AFOLU Requirements section 4.5.19. In the case of combined project types, the methodology appropriately requires development of a unique baseline to account for peat as a soil carbon pool. For instance, module BL-PEAT appropriately operates in combination with Modules M-PEAT and E-BPB to provide conservative procedures for quantification of the baseline. New and existing modules for quantification of baseline emissions encompass all GHG sources, sinks, and carbon pools as specified by the delineated project boundary. The following baseline modules BL-PL, BL-UP, BL-DFW, BL-PEAT, BL-ARR, contain procedures for calculating baseline GHG emissions. The methodology appropriately uses annual accounting procedures in all modules for determination of the baseline emissions.

Major findings related to the quantification of baseline emissions in the revised methodology are presented.

- As per AFOLU Requirements (General) section 4.5.1, Section 3 of VM0007 mentions IPCC good practice guidelines. Section 9.3 of VM0007 states "To help reduce uncertainties in the accounting of emissions and removals, this methodology uses whenever possible the proven methods from the latest available IPCC guidance documents (GPG-LULUCF and Reporting Guidelines) and peer-reviewed literature."

- As per AFOLU Requirements (General) section 4.5.3, no emissions are calculated in the baseline scenario as a result of Rate_peatloss in Module X-STR. Further, all parameters in equations for decay rates listed in section 6 of Module X-STR: such as Ratepeatloss-BSL,i,t were found to be sourced from scientific studies that use primary data or locally calibrated models, or methodologies.

- As per AFOLU Requirements (ARR) section 4.5.5 the methodology does not require that the maximum number of GHG credits available to projects exceed the long-term average GHG benefit. As harvesting is not a part of the project scenario ARR procedures are intended to support restoration and conservation initiatives.

- As per AFOLU Requirements (WRC) section 4.5.25 the PDT is considered part of the baseline and will be reassessed with the baseline in accordance with Section 3.1.10. Methodology developer appropriately added to Section 5.2, "Since the PDT is part of the baseline assessment, it must be reassessed every 10 years".

- As per AFOLU Requirements (WRC) section 4.5.27 micro-topography is specifically mentioned as a possible proxy for baseline emissions (BL-Peat, section 5.3) and as an indicator for stratification (X-STR, section 5(3)).

The procedures for calculating baseline emissions in the methodology are appropriate and adequate for estimating emissions in both mineral soil and peatland situations. The equations and formulas are used without error and parameters for quantification of baseline emissions are used appropriately in calculating all significant baseline emissions.

3.10.2 Project Emissions

Project emissions for monitoring periods are calculated according to REDD, ARR, and WRC project categories which are accompanied by specific monitoring modules. The modules contained within the methodology appropriately monitor for changes in project carbon stocks from natural or anthropogenic causes and accounts for gains or losses in the previously validated monitoring procedures per AFOLU Requirements section 4.5.20.

Major findings related to the quantification of baseline emissions in the revised methodology are presented.

- As per AFOLU Requirements (WRC) section 4.5.33, RWE projects on peatland that include an activity designed specifically to reduce incidence and severity of fires appropriately deduct the amount of peat assumed to burn when estimating peat depletion times. Module M-WRC, section 1.5 discusses fire-related peat losses and are addressed with the following deduction: "The 20% Fire Reduction Premium is a rapid and conservative approach to acknowledging fire emissions reductions as a result of rewetting without having to develop complex baseline scenarios for peat fires. "

The procedures for calculating project emissions in the monitoring modules are appropriate and adequate for estimating emissions. The equations and formulas are used without error and parameters for quantification of emissions are used appropriately in calculating all significant project emissions. The procedures for calculating project emissions using monitoring modules conform to VCS rules.

3.10.3 Leakage

Leakage is taken into account in the methodology and the revised methodology modules are in compliance with VCS rules for REDD, ARR, and WRC project activities. Significance of leakage and carbon pools is appropriately determined using the module T-SIG. In the case of significant market decrease in production of timber, fuelwood, or charcoal, leakage is determined using module LK-ME. Where leakage prevention leads to a significant increase in the use of fertilizers, module E-NA is appropriately used. In accordance with AFOLU Requirements section 4.6.6, leakage mitigation measures which can cause any significant increase in GHG emissions associated with these activities are appropriately accounted for, unless deemed *de minimis* (as set out in AFOLU Requirements section 4.3.3).

The methodology refers to specific modules for leakage calculations according to project category. The REDD methodology modules LK-ASP, LK-ASU, and LK-DFW account for leakage when planned, unplanned, and fuel-wood/charcoal collection baseline scenarios are employed. In the case of leakage due to displacement of pre-project agricultural activities, module LK-ARR is used. For WRC project activities that are not allowed by ARR, where pre-project activities may be displaced to undrained or partially drained peatland areas, the procedures provided for activity

shifting to peatland areas are provided in Module LK-ASP (planned drainage of peatland) or Module LK-ASU (unplanned drainage of peatland). In addition, WRC projects appropriately require the use of LK-ECO to determine ecological leakage.

The methodology has identified all possible leakage sources and used mathematically correct calculations to quantify their effect on GHG reductions of the project. Overall, the procedures chosen to calculate leakage for this methodology are appropriate and adequate.

3.10.4 Net GHG Emission Reductions and Removals

The revised methodology calls for quantifying net GHG emissions reductions and removals (NERs) according to project activity in each monitoring period by subtracting gross reductions and removals from the buffer amount allocation. Uncertainty is addressed through the use of weighted standard errors of estimates from the baseline emissions calculations and project case carbon stock measurements. The methods for calculation of emission reductions and removals from the methodology are appropriate, adequate and in compliance with the VCS Standard, section 4.7.1. The equation and formulas are used without error and parameters for quantification of emissions are used appropriately in calculating all significant emissions.

3.11 Monitoring

The methodology establishes criteria for monitoring by requiring methodology developers to develop a monitoring plan to guide monitoring efforts and the revision now includes variables pertaining to peatland soils. The scope of this assessment therefore includes new data and parameters available at validation and to be monitored (Tables 6 and 7). However, the general procedures for determining baseline emissions and emissions in the project scenario remain the same as validated and in accordance with the VCS Standard section 4.8. The methodology element notes appropriately that data and parameters for leakage, proxy areas, and project accounting areas must be measured at a minimum of every 5 years or after a significant event that changes carbon stocks. Measurement interval is cited correctly per AFOLU Requirements section 4.5.23. The methodology element identifies default factors used which may become out of date and properly identifies those which may require periodic re-assessment per the VCS Standard section 4.1.7.

Data and parameters for monitoring measure the success of project implementation as outlined and measured by module REDD+MF. Monitoring guidance within modules REDD+ MF module is appropriate for project activities applicable to this methodology. The methodology establishes criteria for monitoring by requiring methodology developers to develop a monitoring plan to guide monitoring efforts and the revision now includes variables pertaining to peatland soils.

A subset of monitored data and parameters that were evaluated for appropriateness as part of the methodology revision assessment is presented.

Data and parameters available at validation

Data parameter	Assessment team findings
$\Delta C_{BSL,degrad\text{-}FW/C}$	This data/parameter was included because it pertains to net GHG emissions in the baseline caused by degradation induced by

	fuelwood collection and charcoal production. This value is derived conservatively from approved module BL-DFW and is compliant with VCS rules for default values.
$\Delta C_{BSL,planned}$	This data/parameter was included because it pertains to net GHG emissions in the baseline from planned deforestation. This value is derived conservatively from approved module BL-PL and is compliant with VCS rules for default values.
$\Delta C_{BSL,unplanned}$	This data/parameter was included because it pertains to net GHG emissions in the baseline from unplanned deforestation. This value is derived conservatively from approved module BL-UP and is compliant with VCS rules for default values.
$\Delta C_{LK\text{-}AS,degrad\text{-}FW/C}$	This data/parameter was included because it pertains to net GHG emissions due to activity-shifting leakage caused by degradation induced by fuelwood collection and charcoal production. Calculating leakage from forest degradation caused by fuelwood/charcoal production was found to be a suitable way to account for leakage. This value is derived conservatively from approved module LK-DFW and is compliant with VCS rules for default values.
$\Delta C_{LK\text{-}AS,planned}$	This data/parameter was included because it pertains to net GHG emissions due to activity-shifting leakage from planned deforestation. Calculating leakage from the shifting of an identified deforestation agent was found to be a suitable way to account for leakage. This value is derived conservatively from approved module LK-ASP and is compliant with VCS rules for default values.
$\Delta C_{LK\text{-}AS,unplanned}$	This data/parameter was included because it pertains to net GHG emissions due to activity-shifting leakage from unplanned deforestation. Calculating leakage from displaced immigrant agents and local residents was found to be a suitable way to account for leakage. This value is derived conservatively from approved module LK-ASU and is compliant with VCS rules for default values.
$\Delta C_{LK\text{-}ME}$	This data/parameter was included because it pertains to net GHG emissions due to market-effects leakage. Calculating leakage from the limit of timber supply of fuelwood supplied to a market was found to be a suitable way to account for leakage. This value is derived conservatively from approved module LK-ME and is compliant with VCS rules for default values.

$\Delta C_{BSL-ARR}$	This data/parameter was included because it pertains to net GHG emissions in the ARR baseline scenario up to year *t**. This value is derived conservatively from approved module BL-ARR and is compliant with VCS rules for default values.
$\Delta C_{BSL-WRC}$	This data/parameter was included because it pertains to net GHG emissions in the WRC baseline scenario up to year *t**. This value is derived conservatively from approved module BL-PEAT and is compliant with VCS rules for default values.
$E_{FC,i\,t}$	This data/parameter was included because it pertains to net GHG emissions in the WRC baseline scenario up to year *t**. This value is derived conservatively from approved module E-FFC and is compliant with VCS rules for default values.
$N_2O_{direct\text{-}N,i,t}$	This data/parameter was included because it pertains to direct N_2O emissions as a result of nitrogen application on the later native land use within the project boundary in stratum *i* in year *t**. This value is derived conservatively from approved module E-NA and is compliant with VCS rules for default values.
GHG_{LK-ECO}	This data/parameter was included because it pertains to net GHG emissions due to ecological leakage from the WRC activity up to up to year *t**. This value is derived conservatively from approved module LK-ECO and is compliant with VCS rules for default values.

Data and parameters monitored

Data parameter	Assessment team findings
$\Delta C_{WPS-REDD}$	This data/parameter was included because it pertains to net GHG emissions in the REDD project scenario up to year *t**. Calculating net GHG emissions using this module is suitable because it has been previously assessed and validated (formerly known as M-MON). This value is derived conservatively from approved module M-REDD and is compliant with VCS rules for default values.
$\Delta C_{WPS-ARR}$	This data/parameter was included because it pertains to net GHG emissions in the ARR project scenario up to year *t**. Calculating net GHG emissions using this module is suitable because it is specific to ARR monitoring activities on peat and mineral soils. This value is derived conservatively from approved module M-ARR and is compliant with VCS rules for default values.

$GHG_{,WPS\text{-}WRC}$	This data/parameter was included because it pertains to net GHG emissions in the WRC project scenario up to year *t**. Calculating net GHG emissions using this module is suitable because it is specific to WRC monitoring activities on peat carbon pools due to drainage, rewetting, and fire. This value is derived conservatively from approved module M-PEAT and is compliant with VCS rules for default values.

The assessment team concludes that monitoring procedures for the methodology as appropriate, adequate and in compliance with VCS rules.

3.12 VCS WRC Focus Group

An added component of this methodology assessment was the evaluation of material specific to WRC AFOLU Requirements. These supplemental findings, performed by one of the general technical experts on the assessment team, Carly Green, are relevant for the new inclusion of project activities on peatland soils.

WRC Focus Areas VCS: Review of material specific to AFOLU Requirements	**Findings**
1. Rules and requirements set out for methodologies under section 4.2.16-4.2.22 and for WRC baseline determination (4.4.10-4.4.12) of the AFOLU Requirements.	4.2.16 – This requirement is specifically addressed in REDD-MF Section 4 and is consistent with module M-Peat section 2 and module BL-Peat section 2. In addition, the modules refer to the VCS definition of peatlands and more specifically are applicable to domed peatlands in tropical regions. 4.2.17 – The modules do not explicitly state "Activities that affect the hydrology of the project area are only eligible where changes in hydrology result in the accumulation or maintenance of soil carbon stock", however the project activities listed in the Table in Section 2 meet this criterion. 4.2.18 – The methodology modules clearly state that the VCS definition of peatlands apply. Section 4 of the BL-Peat module clearly defines the applicable activities are RDP and CUPP activities. The specific conditions are described in REDD-MF, Section 3.

	4.2.19 – See below (Item #2) 4.2.20 – See Resolution of Findings section for more details on this requirement. 4.2.21 – Not applicable 4.2.22 – Not applicable
2. As per requirement 4.2.19, the methodology must establish clear procedures to establish a relationship between GHG emissions and water table depths, so that restoration activities, in this case, based on rewetting, can be accurately credited. This also ties in with ensuring how the rate of soil subsidence due to oxidation can be measured -that is to show whether it decreases or rises within the project crediting period.	The methodology describes the procedures to establish a relationship between GHG emissions and various proxies in modules M-Peat and X-STR. These proxies include water table and subsidence rates. The approaches described are consistent with peer reviewed literature and provide clear procedures.
3. To guide the implementation of peatland restoration activities (such as rewetting), procedures must lead to ensuring that changes in hydrology result in the accumulation or maintenance of soil carbon stock - as per Section 4.2.17 of the AFOLU Requirements.	The applicability criteria and the procedures described are consistent with meeting AFOLU Requirements section 4.2.17. See Resolution of Findings section for more details on this requirement.
4. Ensure that procedures in the methodology can guide consideration of peatland hydrological connectivity so that this can be assessed at the project level. E.g. LK-ECO	The approach described in LK-ECO is practical and measurable if the Project Area has hydrological connectivity to other areas. Assuming significant water leakage, LK-ECO would be significantly greater than zero and therefore this module must explicitly state that if LK-ECO is found to be greater than zero then the Project is no longer eligible for crediting.
5. To ensure that approaches and methods contained for WRC will yield realistic rates of peatland recovery (restoring ecological conditions) every peatland site with its own local conditions, thus restoring or enhancing carbon sequestration.	Nothing in the methodology indicates that the approaches and methods will yield unrealistic rates of peatland recovery. The requirements in X-STR require the stratification of the Project Area for monitoring and accounting. The methodology allows the use of appropriate literature values or site specific measurements. The proxies for GHG emissions are consistent and relevant.

4 Assessment Conclusion

Environmental Services Inc. completed the first assessment of the revisions to methodology element "VM0007: REDD + Methodology Framework" modules. The assessment team confirms that the methodology and new revisions adhere to the criteria established for this assessment and are documented and complete. ESI approved changes to the methodology and concludes without any qualifications or limiting conditions that the methodology element documentation (VM0007: REDD + Methodology Framework, version 18 March 2014) meets the requirements of the: VCS Program Guide v3.5, VCS Standard v3.4, VCS AFLOU Requirements v3.4, and the VCS Methodology Approval Process v3.5. Therefore, ESI recommends that VCSA approve the revised methodology element (VM0007: REDD + Methodology Framework, version 20140904) as prepared by Permian Global, Wetlands International, Silvestrum, Greifswald, and CEIC.

5 Report Reconciliation

Report reconciliation was undertaken between 12 December 2014 and 4 February 2015. ESI issued questions to VCS on 12 January 2015. These included grammatical and formatting questions which were adequately addressed by VCS. One substantive clarification was identified by ESI:

- ESI requested clarification as to why the steady state requirement was removed. VCS clarified that this was an unnecessary requirement as it was equivalent to the VCS requirement for long term average GHG benefit which a project cannot credit beyond, and is only required for ARR and IFM project activities that include harvesting which are prohibited under this methodology. ESI considered the request adequately addressed.

A further methodology revision that resulted from VCS review was related to the fire reduction premium, requiring that project proponents must monitor subsidence for at least 3 years after the fire incident. ESI agrees with this addition.

The final approved versions of the revised methodology modules are:

- REDD+ Methodology Modules: REDD+ Methodology Framework (REDD-MF); version 20140904, issue date 20131104

- Estimation of baseline carbon stock changes and greenhouse gas emissions in ARR project activities on peat and mineral soil (BL-ARR); version 20140821, issue date 20131104

- Estimation of baseline carbon stock changes and greenhouse gas emissions in peatland rewetting and conservation project activities (BL-PEAT); version 20140904; issue date 20131104

- Estimation of greenhouse gas emissions from biomass burning (E-BPB); version 20140704; issue date 20131104

- Estimation of emissions from displacement of pre-project agricultural activities (LK-ARR); version 20140904; issue date 20131104

- Estimation of emissions from activity shifting for avoiding planned deforestation and planned degradation (LK-ASP); version 20140904; issue date 20131104

- Estimation of emissions from activity shifting from avoiding unplanned deforestation (LK-ASU); version 20140904; issue date 20131104

- Estimation of emissions from ecological leakage (LK-ECO); version 20140904; issue date 20131104

- Estimation of emissions from market effects (LK-ME); version 20140904; issue date 20131104

- Methods of monitoring greenhouse gas emissions and removals in ARR project activities on peat and mineral soil (M-ARR); version 20140704; issue date 20131104

- Methods for monitoring carbon stock changes and greenhouse gas emissions in WRC project activities (M-PEAT); version 20150129; issue date 20150129

- Estimation of uncertainty for REDD+ project activities (X-UNC); version 20140904; issue date 20131104

- Methods for stratification of REDD and WRC project areas (X-STR); version 20140819; issue date 20131104

6 Evidence Of Fulfilment Of VVB Eligibility Requirements

As set out in the VCS Methodology Approval Process for REDD, ARR, and WRC project categories for AFOLU:

1) Both validation/verification bodies shall be eligible under the VCS Program to perform validation for sectoral scope 14 (AFOLU); AND

2) At least one of the validation/verification bodies shall use an AFOLU expert in the assessment; AND

3) At least one of the validation/verification bodies shall have completed at least ten project validations in any sectoral scope. Project validations can be under the VCS Program or an approved GHG program, with the projects having been registered under the applicable program. A validation of a single project under more than one program (e.g., VCS and CDM) counts as one project validation. The validation/ verification body that meets this eligibility requirement may be the same validation/verification body that uses an AFOLU expert.

ESI fulfils the eligibility requirements in the following ways:

1) ESI is accredited by the American Standards Institute under ISO 14065:2007 for GHG Validation and Verification Bodied; including validation/verification of assertions related to GHG emission reductions and removals at the project level for Land Use and Forestry (Group 3). VCS accepts this accreditation.

2) ESI utilized Shawn McMahon, a WRC non-peatlands expert and Dr. Carly Green, an Independent Expert for Peatland Rewetting and Conservation (PRC), Steve Ruddel, an independent expert of AFOLU who participated in meetings and completed a comprehensive technical review.

3) To date, ESI has completed 25 VCS project validations under AFOLU. Please see Appendix C for the required evidence.

7 Signature

Signed for and on behalf of:

Name of entity: Environmental Services, Inc.

Signature: _____

Name of signatory: Janice McMahon
Sr. Vice President and Forestry, Carbon and GHG Division Technical Manager

Date: 09 February 2015

SMM/JPM/RMB/VO13011.00 Methodology Assessment Report_Final_20150209.doc
K pf 02/09/15f

Appendix A – List of Documents Received/Reviewed

Documents Received 3 July 2013

- VCS Methodology Approval Process Submission Form, VM0007 Permian 20130703.pdf

Documents Received 26 September 2013

- VCS Letter to SCS, WRC Program Updates, 19 JUN 2013.pdf

Documents Received 10 November 2013

- VM0007 Revision _VCS_3.3_Methodology_Validation_Checklist_Final NCR-CL-OFI Permian 20131104.xlsx
- VM0007 Revision _VCS_3 3_Methodology_Validation_Checklist_Final NCR-CL-OFI Permian 20131111.xlsx
- VM0007 modules.zip
    - X_UNC 20131104.docx
    - X-STR_20131104.docx
    - BL-ARR 20131104.docx
    - BL-PEAT 20131104.docx
    - E-BPB 20131104.docx
    - LK-ARR 20131104.docx
    - LK-ASP 20131104.docx
    - LK-ASU 20131104.docx
    - LK-ECO 20131104.docx
    - LK-ME 20131104.docx
    - M-ARR 20131104.docx
    - M-PEAT_20131104.doc
    - REDD+MF 20131104.docx

Documents Received 13 February 2014

- FW Adjustments to LK-ASP and LK-ME.msg
- LK-ASP 20140211 formatted.docx
- LK-ASP 20140211.docx
- LK-ME 20140211 formatted.docx
- LK-ME 20140211.docx
- VM0007 Revision _VCS_3 3_Methodology_Validation_Checklist_Final NCR-CL-OFI Permian 20131213_Round2_Final Permian 20140211.xlsx

Documents Received 20 February 2014

- VM0007 modules 2nd iteration.msg
- VM0007 Revision _VCS_3 3_Methodology_Validation_Checklist_Final NCR-CL-OFI Permian 20131213_Round2_Final Permian 20140211.xlsx
- VM0007 modules 2nd iteration
    - BL-ARR 20140211 formatted.docx
    - BL-ARR 20140211.docx
    - BL-PEAT 20140203.docx
    - BL-PEAT 20140211 formatted.docx
    - BL-PEAT 20140211.docx
    - E-BPB 20140211 formatted.docx
    - E-BPB 20140211.docx
    - LK-ARR 20140211 formatted.docx
    - LK-ARR 20140211.docx
    - LK-ASP 20140211 formatted.docx
    - LK-ASP 20140211.docx

- LK-ASU 20140211 formatted.docx
- LK-ASU 20140211.docx
- LK-ECO 20140211 formatted.docx
- LK-ECO 20140211.docx
- LK-ME 20140211 formatted.docx
- VM0007 modules 2nd iteration\LK-ME 20140211.docx
- M-ARR 20140211 formatted.docx"
- VM0007 modules 2nd iteration\M-ARR 20140211.docx
- VM0007 modules 2nd iteration\M-PEAT_20140211 formatted.docx
- VM0007 modules 2nd iteration\M-PEAT_20140211.doc
- VM0007 modules 2nd iteration\REDD+MF 20140203.docx
- VM0007 modules 2nd iteration\REDD+MF 20140206 formatted.docx
- VM0007 modules 2nd iteration\X_UNC 20140203.docx
- VM0007 modules 2nd iteration\X_UNC 20140211 formatted.docx
- VM0007 modules 2nd iteration\X_UNC 20140211.docx
- X-STR_20140211 formatted.docx
- VM0007 modules 2nd iteration\X-STR_20140211.docx

Documents received 24 March 2014

- VM0007 Submission Round 3
  - X-STR_20140318 formatted.docx
  - BL-ARR 20140318 formatted.docx
  - BL-PEAT 20140318 formatted.docx
  - E-BPB 20140318 formatted.docx
  - LK-ARR 20140318 formatted.docx
  - LK-ASP 20140318 formatted.docx
  - LK-ASU 20140318 formatted.docx
  - LK-ECO 20140318 formatted.docx
  - LK-ME 20140318 formatted.docx
  - M-ARR 20140318 formatted.docx
  - M-PEAT 20140318 formatted.docx
  - REDD+MF 20140318 formatted.docx
  - VM0007 Revision _VCS_3 3_Methodology_Validation_Checklist_NCR-CL-OFI Permian Final findings_03_13_2014 Permian 20140324.xlsx
  - X_UNC 20140318 formatted.docx

Documents received 31 March 2014

- 011-Permian-Methodology Assessment Report-draft v4_PGcomments.doc

Documents received 12 December 2014 (from VCS)

- X_UNC 20140904.docx
- X-STR_20140819.docx
- BL-ARR 20140821.docx
- BL-PEAT 20140904.docx
- E-BPB 20140704.docx
- LK-ARR 20140904.docx
- LK-ASP 20140904.docx
- LK-ASU 20140904.docx
- LK-ECO 20140904.docx
- LK-ME 20140904.docx
- M-ARR 20140704.docx
- M-PEAT 20141027.docx
- REDD-MF 20140904.docx
- Methodology Assessment Report_VM0007_3 3 _FVR_Clean_Approval.pdf

Documents received 06 January 2015

- BL-ARR 20140821.docx
- BL-PEAT 20141104 CH4.docx
- E-BPB 20140704.docx
- LK-ARR 20140904.docx
- LK-ASP 20140904.docx
- LK-ASU 20140904.docx
- LK-ECO 20140904.docx
- LK-ME 20140904.docx
- M-ARR 20140704.docx
- M-PEAT 20141027.docx
- REDD+MF 20140904.docx
- X_UNC 20140904.docx
- X-STR_20140819.docx

Documents received 29 January 2015

- M-PEAT 20141027_IE 20150129.docx

Appendix B – NCRs/CL/OFIs

Item Number	1
VCS Standard 3.4 Requirements (October 2013)	4.1.3 Methodologies may employ a modular approach in which a framework document provides the structure of the methodology and separate modules and/or tools are used to perform specific methodological tasks. Such methodologies shall use the VCS Methodology Template for the framework document and the VCS Module Template for the modules and tools. The framework document shall clearly state how the modules and/or tools are to be used within the context of the methodology.
Evidence Used to Assess	VCS webpage, Methodology V3.2 template, and Module V3.2 template
ESI Findings - Round 1 03 October 2013	It appears the methodology template V 2 which is not most current template. It also appears that some of the modules use the updated module template V3.2, while others do not.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please ensure the updated VCS templates are used for the methodology and all of the modules and tools.
Response from Methodology Developer 11 November 2013	We will make sure to apply the most recent template, however not by merging the text into a new template but by amending the old one. In some instances the footer with the previous version number was still indicated.
ESI Findings - Round 2 13 December 2013	There appears to be no changes to the Methodology or modules. They do not use the current templates or have not yet implemented changes indicated in response.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please ensure the updated VCS templates are used for the methodology and all of the modules and tools.
Response from Methodology Developer 20 February 2014	Formatted modules and tools provided
Final ESI Findings 11 March 2014	All modules and tools have been formatted and match the templates supplied at: VCS webpage, Methodology V3.3 (Issued: 8 October 2013) template, and Module V3.3 template (Issued: 8 October 2013). Please ensure that all version numbers and footers match the template or use the template provided. Details of the resolution of this finding can be found in the Resolution of Findings section. Finding closed.

Item Number	2
VCS Standard 3.4 Requirements (October 2013)	4.1.4 Methodology elements shall be guided by the principles set out in Section 2.4.1. They shall clearly state the assumptions, parameters and procedures that have significant uncertainty, and describe how such uncertainty shall be addressed. Where applicable, methodology elements shall provide a means to estimate a 90 or 95 percent confidence interval. Where a methodology applies a 90 percent confidence interval and the width of the confidence interval exceeds 20 percent of the estimated value or where a methodology applies a 95 percent confidence interval and the width of the confidence interval exceeds 30 percent of the estimated value, an appropriate confidence deduction shall be applied. Methods used for estimating uncertainty shall be based on recognized statistical approaches such as those described in the IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. Confidence deductions shall be applied using conservative factors such as those specified in the CDM Meth Panel guidance on addressing uncertainty in its Thirty Second Meeting Report, Annex 14.
Evidence Used to Assess	Module X-UNC
ESI Findings - Round 1 03 October 2013	Module X-UNC appears to meet all of the criteria. It describes how uncertainty is addressed, provides a means to estimate a 95% confidence interval, and applies appropriate deductions when confidence cannot be reached. However it is unclear what methods are based on recognized statistical approaches.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please be explicit on source of methods used to estimate uncertainty, "Methods used for estimating uncertainty shall be based on recognized statistical approaches such as those described in the IPCC Good Practice Guidance and Uncertainty Management in National Greenhouse Gas Inventories. "
Response from Methodology Developer 11 November 2013	Please explain why there is a need for a CL. We believe it is the task of the validator to assess whether the methods used meet the said requirements. We can only confirm that indeed the principles in the IPCC guidance have been adopted. 4.1.4 does not require the developer to refer to the said guidance. Perhaps we do not fully understand the CL.
ESI Findings - Round 2 13 December 2013	Referring to the requirement (that IPCC principles guidance were adopted) in this review is sufficient and the methodology does not need to be altered. The validator was looking for explicit statement from the methodology developer that recognized statistical approaches were used and is confirming their appropriateness through the rest of the validation. Finding closed.

Item Number	3
VCS Standard 3.4 Requirements (October 2013)	1) Where the methodology uses third party default factors and/or standards, such default factors and standards shall meet with the requirements for data set out in Section 4.5.6, mutatis mutandis. 2) Where the methodology itself establishes a default factor, the following applies: a) The data used to establish the default factor shall comply with the requirements for data set out in Section 4.5.6, mutatis mutandis. b) The methodology shall describe in detail the study or other method used to establish the default factor. c) The methodology developer shall identify default factors which may become out of date (i.e., those default factors that do not represent physical constants or otherwise would not be expected to change significantly over time). Such default factors are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process. 3) Where methodologies allow methodology developers to establish a project-specific factor, the methodology shall provide a procedure for establishing such factors.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	It appears that the methodology developer failed to identify default factors which may become out of date (i.e., those default factors that do not represent physical constants or otherwise would not be expected to change significantly over time). Such default factors are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please identify all default factors established in the methodology (tools M-WRC, E-BRP, LK-ASP, LK-ASU, LK-ME, and X-STR) that may become out of date, and are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process.
Response from Methodology Developer 11 November 2013	Please explain why there is non-conformity. We believe it is the task of the validator to identify where we do not meet the said requirement, if that is at all the case.
ESI Findings - Round 2 13 December 2013	Default factors that may become out of date or change significantly over time need to be identified in the methodology for periodic assessment (to make sure they are still appropriate). These are only factors established in the "methodology itself" (i.e. factors that may not be updated periodically by other bodies such as IPCC defaults. These are examples that would already be subject to periodic updating and would not be expected to change significantly over time). Please identify all factors that are established in the methodology.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please identify all default factors established in the methodology (tools M-WRC, E-BRP, LK-ASP, LK-ASU, LK-ME, and X-STR) that may become out of date, and are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process.

Response from Methodology Developer 20 February 2014	Default factors to be derived from IPCC or literature are not listed. REDD+-MF - None M-PEAT - Default factor for reduced emissions from peat fire (0.2) - CC, Carbon concentration in fibric/hemic peat of low ash content (< 5%) (default 55%) BL-ARR - None BL-PEAT - None E-BPB - CF, Carbon fraction of biomass; t C t-1 d.m. (default 0.47) LK-ASP - None LK-ASU - None LK-ECO - None LK-ME - CF, Carbon fraction of dry matter t C t d.m.-1 (default 0.47) - LDF, Logging damage factor; t C m-3 (default 0.53 for broadleaf and mixed forests; 0.25 for coniferous forests) - LIF, Logging infrastructure factor; t C m-3 (default 0.29) X-UNC - None X-STR - None
Final ESI Findings 11 March 2014	Response Identifies all default factors established in the methodology (tools M-WRC, E-BRP, LK-ASP, LK-ASU, LK-ME, and X-STR) that may become out of date, and are subject to periodic re-assessment, as set out in VCS document Methodology Approval Process. Finding closed. OFI: default factors are not required to be listed in the methodology, but including this list would be helpful to future assessments.

Item Number	4
VCS Standard 3.4 Requirements (October 2013)	4.1.9 Methodologies shall use a standardized method (i.e., performance method or activity method) or a project method to determine additionality and/or the crediting baseline, and shall state which type of method is used for each. A project method is a methodological approach that uses a project-specific approach for the determination of additionality and/or crediting baseline. Standardized methods are further described in Section 4.1.11 and additional guidance is available in VCS document Guidance for Standardized Methods. This guidance document provides additional information to aid the interpretation of the VCS rules on standardized methods and should be read before developing or assessing such methods. Although the guidance document does not form part of the VCS rules, interpretation of the rules shall be consistent with the guidance document.
Evidence Used to Assess	VCS Methodology VM0007
ESI Findings - Round 1 03 October 2013	Methodology does not appear to explicitly state which type of method was used to determine additionality and/or the crediting baseline (i.e., performance method, activity method, or project method).
Round 1 NCR /CL / OFI 03 October 2013	CL: Please add language to VCS Methodology VM0007 and relevant tools to explicitly state which type of method was used to determine additionality and/or the crediting baseline (i.e., performance method, activity method, or project method).
Response from Methodology Developer 11 November 2013	The required table has been added to REDD-MF
ESI Findings - Round 2 13 December 2013	REDD+MF 20131104.docx section 2 contains a table that clearly indicates the method of determining additionality and baseline. Finding closed.

Item Number	5
VCS Standard 3.4 Requirements (October 2013)	4.1.11 Standardized methods are methodological approaches that standardize the determination of additionality and/or the crediting baseline for a given class of project activity, with the objective of streamlining the development and assessment process for individual projects. Additionality and/or the crediting baseline are determined for the class of project activity, and qualifying conditions and criteria are set out in the methodology. Individual projects need only meet the conditions and apply the pre-defined criteria set out in the standardized method, obviating the need for each project to determine additionality and/or the crediting baseline via project-specific approaches and analyses.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	The validator did not include review of standardized methods in its contracted scope.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please clarify if the methodology developer has had any interaction with the VCS to determine if the scope of this methodology is to include an assessment of the new standardized methods requirements.
Response from Methodology Developer 11 November 2013	There has been a request from the VCS to propose standardized approaches for baseline and/or additionality. We found this to be unfeasible.

ESI Findings - Round 2 13 December 2013	REDD+MF 20131104.docx section 2 contains a table that clearly indicates the method of determining additionality and baseline, thus requirements for standardized methods (i.e., performance method or activity methods) do not apply. Finding closed.

Item Number	6
VCS Standard 3.4 Requirements (October 2013)	4.3.1 The methodology shall use applicability conditions to specify the project activities to which it applies and shall establish criteria that describe the conditions under which the methodology can (and cannot, if appropriate) be applied. Any applicability conditions set out in tools or modules used by the methodology shall also apply.
Evidence Used to Assess	Methodology VM0007 section 4
ESI Findings - Round 1 03 October 2013	Many of the original applicability conditions have been removed. Removal of some (such as those excluding peatlands) makes sense, however it is unclear why others, such as "• If land is not being converted to an alternative use but will be allowed to naturally regrow (i.e. temporarily unstocked), this framework shall not be used."
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please see "Applicability Deletions" tab and justify the removal of these applicability requirements.
Response from Methodology Developer 11 November 2013	See there
ESI Findings - Round 2 13 December 2013	Three NCR's remain on Applicability Conditions Sheet
Round 2 NCR /CL / OFI 13 December 2013	
Response from Methodology Developer 20 February 2014	
Final ESI Findings 11 March 2014	All NCR's addressed on Applicability Conditions Sheet. Finding closed.

Item Number	7
VCS Standard 3.4 Requirements (October 2013)	4.3.9 The applicability conditions shall establish the scope of validity of the methodology, including the geographic scope. In establishing the scope of validity of the methodology, the methodology shall clearly demonstrate that there is similarity across the sub-areas of the geographic scope in factors such as socio-economic conditions, climatic conditions, energy prices, raw material availability and electricity grid emission factors, as such factors relate to the baseline scenario and additionality, It may be necessary to limit the applicability of the methodology to comply with this requirement.
Evidence Used to Assess	Methodology VM0007 section 4, and section 8, BL-ARR, BL-WRC
ESI Findings - Round 1 03 October 2013	Neither the REDD +MF framework nor the methodology module BL-ARR appear to establish a geographic scope for ARR.

Round 1 NCR /CL / OFI 03 October 2013	NCR: Please provide applicability conditions within the REDD +MF framework and ARR module which specify a geographic scope and demonstrate there is similarity across the sub-areas of the geographic scope as required by 4.3.9 of the Standard 3.3.
Response from Methodology Developer 11 November 2013	There is no limitation with respect to the geographic scope of the ARR procedures and therefore we have not made any specific statement in REDD+-MF or BL-ARR. `demonstrating 'similarity' across sub-regions would be superfluous as all areas are on land and on this Globe.
ESI Findings - Round 2 13 December 2013	
Round 2 NCR /CL / OFI 13 December 2013	
Response from Methodology Developer 20 February 2014	
Final ESI Findings 11 March 2014	Response sufficient, this requirement is not applicable to the methodology as it does not use standardized methods. .

Item Number	8
VCS Standard 3.4 Requirements (October 2013)	3) Compare the GHG sources, sinks and reservoirs identified for the project with those identified in the baseline scenario, to ensure equivalency and consistency.
Evidence Used to Assess	Methodology VM0007 section 5.3 and 5.5
ESI Findings - Round 1 03 October 2013	Could not identify a comparison within the methodology of the GHG sources, sinks and reservoirs identified for the project with those identified in the baseline scenario, to ensure equivalency and consistency.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please demonstrate how the methodology compares the GHG sources, sinks and reservoirs identified for the project with those identified in the baseline scenario, to ensure equivalency and consistency.
Response from Methodology Developer 11 November 2013	The pools and GHGs that define the project boundary are presented in REDD+-MF in Sections 5.3 and 5.4 where the tables apply to both the baseline and with-project scenarios (i.e. no distinction is made between the scenarios).
ESI Findings - Round 2 13 December 2013	CL Closed, new NCR: Response sufficient CL closed.
Round 2 NCR /CL / OFI 13 December 2013	NCR: In the methodology please state that tables in sections 5.3. and 5.4 apply to both the baseline and with-project scenarios.
Response from Methodology Developer 20 February 2014	Done
Final ESI Findings 11 March 2014	The methodology states that tables in sections 5.3. and 5.4 apply to both the baseline and with-project scenarios. Finding closed.

Item Number	9
VCS Standard 3.4 Requirements (October 2013)	5) Data shall be publicly available or made publicly available. Proprietary data (eg, data pertaining to individual facilities) may be aggregated, and therefore not made publicly available, where there are demonstrable confidentiality considerations. However, sufficient data shall be publicly available to provide transparency and credibility to the dataset.
Evidence Used to Assess	Methodology VM0007
ESI Findings - Round 1 03 October 2013	Does not appear to address this requirement.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please provide evidence from the Methodology that sufficient data from each project shall be made publicly available to provide transparency and credibility to the dataset.
Response from Methodology Developer 11 November 2013	This requirement applies to performance methods, therefore not to our methodology.
ESI Findings - Round 2 13 December 2013	REDD+MF 20131104.docx section 2 contains a table that clearly indicates the method of determining additionality and baseline, thus requirements for standardized methods (i.e., performance method or activity methods) do not apply. Finding closed.

Item Number	10
VCS Standard 3.4 Requirements (October 2013)	6) All data shall be made available, under appropriate confidentiality agreements as necessary, to the VCSA and each of the validation/verification bodies assessing the proposed performance benchmark methodology, to allow them to reproduce the determination of the performance benchmark. Data shall be presented in a manner that enables them to independently assess the presented data.
Evidence Used to Assess	Methodology VM0007
ESI Findings - Round 1 03 October 2013	Does note appear to address this requirement.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please provide evidence from the Methodology that data shall be made available, under appropriate confidentiality agreements as necessary, to the VCSA and each of the validation/verification bodies assessing the proposed performance benchmark methodology, to allow them to reproduce the determination of the performance benchmark. Data shall be presented in a manner that enables them to independently assess the presented data.
Response from Methodology Developer 11 November 2013	This requirement applies to performance methods, therefore not to our methodology.
ESI Findings - Round 2 13 December 2013	REDD+MF 20131104.docx section 2 contains a table that clearly indicates the method of determining additionality and baseline, thus requirements for standardized methods (i.e., performance method or activity methods) do not apply. Finding closed.

Item Number	11
VCS Standard 3.4 Requirements (October 2013)	4.6.1 The methodology shall establish a procedure for the demonstration and assessment of additionality based upon the requirements set out below. Note that such requirements are for methodology development, and projects shall demonstrate and assess additionality in accordance with the requirements set out in the applied methodology.

Evidence Used to Assess	Methodology VM0007 section 3, Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Activities" and instead switch to the CDM, Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities
ESI Findings - Round 1 03 October 2013	The methodology developers have proposed changing the existing approved VCS "Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Activities" to the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities", however this was developed only with afforestation/reforestation in mind. Not clear why this change is necessary.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please describe why the methodology developers have chosen to eliminate the existing approved VCS "Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Activities" and instead switch to the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". In particular, please specify how this tool is appropriate for use with REDD and WRC activities when it was developed by CDM specifically for use with only Afforestation/Reforestation activities.
Response from Methodology Developer 11 November 2013	The VCS standard itself refers to the CDM tool. Moreover, the VCS tool is a 99% copy-paste from the VCS tool. However, it lacks procedures for the selection of the most likely baseline scenario. In this respect the CDM tool is a more complete method.
ESI Findings - Round 2 13 December 2013	Response sufficient, the response describes why the methodology developers have chosen to eliminate the existing approved VCS "Tool for the Demonstration and Assessment of Additionality in VCS Agriculture, Forestry and Other Land Use (AFOLU) Activities" and instead switch to the CDM "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". The response also specifies how this tool is appropriate for use with REDD and WRC activities when it was developed by CDM specifically for use with only Afforestation/Reforestation activities " However, it (the VCS tool) lacks procedures for the selection of the most likely baseline scenario. In this respect the CDM tool is a more complete method." Finding closed.

Item Number	12
VCS Standard 3.4 Requirements (October 2013)	4) Monitoring frequency and measurement procedures.
Evidence Used to Assess	M-WRC section 1.6, M-ARR section 5
ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please provide the frequency of monitoring and description of measurement for all parameters in module M-WRC and M-ARR.
Response from Methodology Developer 11 November 2013	This will be completed when finalizing the formatting according to the VCS template.
ESI Findings - Round 2 13 December 2013	Not yet completed.

Round 2 NCR /CL / OFI 13 December 2013	NCR: Please provide the frequency of monitoring and description of measurement for all parameters in module M-WRC and M-ARR.
Response from Methodology Developer 20 February 2014	Provided in newly formatted modules
Final ESI Findings 11 March 2014	Response Sufficient frequency of monitoring and description of measurement for all parameters are provided in formatted modules such as M-Peat, section 6.2 Data and Parameters Monitored. Finding closed.

Item Number	13
VCS AFOLU Requirements Version 3.4 (October 2013)	4.1.2 As set out in the VCS Standard, standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality shall be publicly available and come from a reputable and recognized source, such as *IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry*.
Evidence Used to Assess	Methodology VM0007 section 7, and CDM Tool T-ADD
ESI Findings - Round 1 03 October 2013	Pending response to 4.6.1, row 98 of Standard 3.3 tab
Round 1 NCR /CL / OFI 03 October 2013	
Response from Methodology Developer 11 November 2013	
ESI Findings - Round 2 13 December 2013	The pending requirement has been met, however it is not clear that standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality are publicly available and come from a reputable and recognized sources, such as IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please demonstrate that standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality are publicly available and come from reputable and recognized sources, such as IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry.
Response from Methodology Developer 20 February 2014	Language added to Chapter 7 of REDD+-MF and Chapter 5 of BL-PEAT.
Final ESI Findings 11 March 2014	Response sufficient, language has been added to Chapter 7 of REDD+-MF and Chapter 5 of BL-PEAT to indicate that standards and factors used to derive GHG emissions data as well as any supporting data for baseline scenarios and additionality are publicly available and come from a reputable and recognized sources, such as IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidelines for Land Use, Land-Use Change and Forestry. Finding closed.

Item Number	14
VCS AFOLU Requirements Version 3.4 (October 2013)	4.4.1 The determination and establishment of a baseline scenario shall follow an internationally accepted GHG inventory protocol, such as the IPCC 2006 Guidelines for National GHG Inventories.
Evidence Used to Assess	VCS Methodology VM0007 Section 6.1, BL-ARR, and BL-WRC
ESI Findings - Round 1 03 October 2013	Not specifically stated.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please clarify how the methodology and supporting Modules BL-ARR and BL-WRC follow an internationally accepted GHG inventory protocol, such as the IPCC 2006 Guidelines for National GHG Inventories for the determination and establishment of a baseline scenario.
Response from Methodology Developer 11 November 2013	This section of the AFOLU requirements is about the scenario in a qualitative sense. The quantification is dealt with in Section 4.5. The methodology in CH6 refers to the CDM combined tool, which is a VCS-approved tool. A reference to internationally accepted protocols in this context is therefore not necessary.
ESI Findings - Round 2 13 December 2013	Response sufficient, CL: Closed: The tool used to assess additionality and the baseline scenario is T-ADD (CDM combined tool). This is an internationally accepted GHG inventory protocol. Finding closed.

Item Number	15
VCS AFOLU Requirements Version 3.4 (October 2013)	4.5.1 Methodologies shall establish procedures to quantify the GHG emissions or removals for the project and baseline scenario. The *IPCC 2006 Guidelines for National GHG Inventories* or the *IPCC 2003 Good Practice Guidance for Land Use, Land-Use Change and Forestry* shall be used as guidance for quantifying increases or decreases in carbon stocks and GHG emissions. The IPCC Guidelines shall also be followed in terms of quality assurance/quality control (QA/QC) and uncertainty analysis.
Evidence Used to Assess	Sections 3, and 9.3 of VM0007.
ESI Findings - Round 1 03 October 2013	Section 3 of VM0007 mentions IPCC good practice guidelines and other parts of the methodology make reference as well, but none explicitly state how this guidance was used. Section 9.3 of VM0007 states "To help reduce uncertainties in the accounting of emissions and removals, this methodology uses whenever possible the proven methods from the latest available IPCC guidance documents (GPG-LULUCF and Reporting Guidelines) [JC2] and peer-reviewed literature."
Round 1 NCR /CL / OFI 03 October 2013	CL: Please confirm how the IPCC 2006 Guidelines for National GHG Inventories or the IPCC 2003 Good Practice Guidance for Land Use, Land-Use Change and Forestry were used as guidance for quantifying increases or decreases in carbon stocks and GHG emissions. Please also confirm how the IPCC Guidelines were followed in terms of quality assurance/quality control (QA/QC) and uncertainty analysis.
Response from Methodology Developer 11 November 2013	The IPCC guidelines suggest the use of proxies such as carbon stock change and others for the estimation of GHG emissions and removals. The methodology follows this approach. Moreover, much of the guidance provided by the IPCC is captured in the VCS standard, which ensures that methodologies are up to terms with IPCC when compliant with the standard. IPCC suggests various elements of QA/QC and uncertainty analysis that are used in the methodology.

ESI Findings - Round 2 13 December 2013	The response does not list various elements of QA/QC and uncertainty analysis that are used in the methodology. One example is section 9.3 of the methodology, which states "*Standard operating procedures (SOPs) and quality control/quality assurance (QA/QC) procedures for inventories including field data collection and data management shall be applied. Use or adaptation of SOPs already applied in national land use monitoring, or available from published handbooks, or from the latest IPCC guidance documents (GPG–LULUCF, Reporting Guidelines, is recommended;*" Response sufficient, finding closed.

Item Number	16
VCS AFOLU Requirements Version 3.4 (October 2013)	4.5.3 Where carbon would have been lost in the baseline scenario due to land use conversion or disturbance, GHG emissions from soil carbon, belowground biomass, wood products and dead wood carbon pools generally occur over a period of time following the event. It shall not be assumed that all GHG emissions from these carbon pools in the project categories specified below occur instantaneously or within a short period of time.
Evidence Used to Assess	Module X-STR, section 4
ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please restrict variables that depict GHG emissions due to land use conversion or disturbance from soil carbon, belowground biomass, wood products and dead wood carbon pools (e.g. $Rate_{peatloss-BSL}$) so they cannot occur instantaneously or within a short period of time.
Response from Methodology Developer 11 November 2013	We do not see how 4.5.3 would apply to Rate_peatloss as it is used in X-STR to fulfill PDT and permanence criteria.
ESI Findings - Round 2 13 December 2013	If any emissions are calculated in the baseline scenario as a result of Rate_peatloss, then it appears that these criteria must be met. Emissions due to disturbance or conversion rates must not instantaneously or within a short period of time.GP_11/18/13
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please restrict variables (or show that proper measurements) that depict GHG emissions due to land use conversion or disturbance from soil carbon, belowground biomass, wood products and dead wood carbon pools (e.g. Ratepeatloss-BSL) cannot occur instantaneously or within a short period of time.
Response from Methodology Developer 20 February 2014	This rate is not used to determine emissions in BSL. It is only used to estimate t_PDT.
Final ESI Findings 11 March 2014	Response sufficient, no emissions are calculated in the baseline scenario as a result of Rate_peatloss. Finding closed.

Item Number	17
VCS AFOLU Requirements Version 3.4 (October 2013)	Where appropriate, belowground biomass, soil carbon and dead wood decay models shall be calibrated. Where models are calibrated using measurement plots or data from research plots, sound and reliable measurement methods shall be applied as set out in Section 4.8.3.
Evidence Used to Assess	Module X-STR section 6

ESI Findings - Round 1 03 October 2013	Module X-STR section 6 does not describe the process for calibrating the model for $Rate_{peatloss\text{-}BSL,i,t}$ (Rate of peat loss due to subsidence and fire in the baseline scenario in stratum i at year t;) using measurement plots or data from research plots. Module X-STR section 7 references Module M-WRC to describe measurement and calibration procedures for $Rate_{peatloss\text{-}WPS,i,t}$, these procedures do not appear to be described in this module.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please describe how the model for the $Rate_{peatloss\text{-}BSL,i,t}$ (rate of peat loss due to subsidence and fire in the baseline scenario in stratum i at year t;) and $Rate_{peatloss\text{-}WPS,i,t}$ (Rate of peat loss due to subsidence and fire in the with-project scenario in stratum i in year t) in Module X-STR are calibrated using measurement plots or data from research plots, and how measurement methods are sound and reliable as set out in Section 4.8.3.
Response from Methodology Developer 11 November 2013	We added that Rate_peatloss constitutes the sum of Rate_subs and P_burndepth (from M-WRC). M-WRC is detailed on how to measure.
ESI Findings - Round 2 13 December 2013	Module M-WRC section1.6 describes monitoring soil subsidence (Rate_subs and P_burndepth). An addition has been made to Module X-STR section 3 to describe Rate_peatloss constitutes the sum of Rate_subs and P_burndepth (from M-WRC). Finding closed.

Item Number	18
VCS AFOLU Requirements Version 3.4 (October 2013)	4.6.2 Leakage that is determined, in accordance with Section 4.3.3, to be below de minimis (i.e., insignificant) does not need to be included in the GHG emissions accounting. The significance of leakage may also be determined using the CDM A/R methodological tool *Tool for testing significance of GHG Emissions in A/R CDM Project Activities.*
Evidence Used to Assess	VCS Methodology VM0007 section 8.3, and module: T-SIG
ESI Findings - Round 1 03 October 2013	Module T-SIG appears to be used to determine the significance of leakage effects though it is not clearly stated in the methodology.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please revise section 8.3 of the Methodology to describe clearly what Module T-SIG is used to determine the significance of.
Response from Methodology Developer 11 November 2013	We added 'The significance of leakage may be determined using T-SIG'.
ESI Findings - Round 2 13 December 2013	Section 8.3 of VCS Methodology VM0007version20131104 clearly states "The significance of leakage and the significance of carbon pools may be determined using T-SIG." Finding closed.

Item Number	19
VCS AFOLU Requirements Version 3.4 (October 2013)	4.6.6 Where leakage mitigation measures include tree planting, aquacultural intensification, agricultural intensification, fertilization, fodder production, other measures to enhance cropland and/or grazing land areas, leakage management zones or a combination of these, then any significant increase in GHG emissions associated with these activities shall be accounted for, unless deemed de minimis (as set out in Section 4.3.3) or can be conservatively excluded (as set out in Section 4.3.4).
Evidence Used to Assess	VCS Methodology VM0007 section 5.4, and leakage Modules: LK-ASU ,LK-DFW , LK-ARR, and LK-ASP

ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	CL: Please provide evidence where leakage mitigation measures that include tree planting, aquacultural intensification, agricultural intensification, fertilization, fodder production, other measures to enhance cropland and/or grazing land areas, leakage management zones or a combination of these, then any significant increase in GHG emissions associated with these activities shall be accounted for, unless deemed de minimis (as set out in Section 4.3.3) or can be conservatively excluded (as set out in Section 4.3.4)
Response from Methodology Developer 11 November 2013	Language in Section 8.3 in MF amended and made more general.
ESI Findings - Round 2 13 December 2013	Language added to section 8.3 of VCS Methodology VM0007version20131104 does not entirely meet the requirement and should be amended. The added language states "Where applicable, leakage due to market effects shall be considered using LK-ME. Market effects shall be considered where the project leads to a decrease in the production of timber, fuel wood, or charcoal. Leakage prevention activities may lead to the increase in combustion of fossil fuels, however, any increase in emissions is considered insignificant (see underlined language from requirement below). Where leakage prevention leads to a significant increase in the use of fertilizers, module E-NA shall be used. T-SIG can be used to determine significance (and shall be accounted for...see language below). As per the applicability conditions, leakage prevention may not include the flooding of agricultural lands (e.g. for new rice paddies) nor the creation of livestock feedlots and/or manure lagoons." Particularly, this language does not directly require that any significant increase in GHG emissions associated with these activities shall be accounted for, unless deemed de minimis (as set out in Section 4.3.3) or can be conservatively excluded (as set out in Section 4.3.4).
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please clarify language added to 8.3 of VCS Methodology VM0007version20131104 to fully meet the requirement 4.6.6, "Where leakage mitigation measures include tree planting, aquacultural intensification, agricultural intensification, fertilization, fodder production, other measures to enhance cropland and/or grazing land areas, leakage management zones or a combination of these, then any significant increase in GHG emissions associated with these activities shall be accounted for, unless deemed de minimis (as set out in Section 4.3.3) or can be conservatively excluded (as set out in Section 4.3.4)."
Response from Methodology Developer 20 February 2014	Additional language added to 8.3 of REDD+-MF. No need to add language to leakage modules.
Final ESI Findings 11 March 2014	Additional language added to 8.3 of REDD+-MF. Finding closed.

Item Number	20
VCS AFOLU Requirements Version 3.4 (October 2013)	4.6.7 Projects shall not account for positive leakage (i.e., where GHG emissions decrease or removals increase outside the project area due to project activities).
Evidence Used to Assess	VCS Methodology VM0007 section 8.3, and leakage Modules: LK-ASU ,LK-DFW , LK-ARR, and LK-ASP

ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	CL: Please provide evidence that positive leakage (i.e., where GHG emissions decrease or removals increase outside the project area due to project activities)is not accounted for.
Response from Methodology Developer 11 November 2013	Language added to Section 8.3 in MF
ESI Findings - Round 2 13 December 2013	The word positive leakage was found inserted within the document on page 24, however it did not appear to have any context.
Round 2 NCR /CL / OFI 13 December 2013	Please revise section 8.3 to clearly state that positive leakage is not accounted for.
Response from Methodology Developer 20 February 2014	Language added to 8.3 of REDD+-MF.
Final ESI Findings 11 March 2014	Additional language added to 8.3 of REDD+-MF. Finding closed.

Item Number	21
VCS AFOLU Requirements Version 3.4 (ARR) (October 2013)	4.2.1 Eligible ARR activities are those that increase carbon sequestration and/or reduce GHG emissions by establishing, increasing or restoring vegetative cover (forest or non-forest) through the planting, sowing or human-assisted natural regeneration of woody vegetation. Eligible ARR projects may include timber harvesting in their management plan. The project area shall not be cleared of native ecosystems within the 10 year period prior to the project start date, as set out in Section 3.1.5.
Evidence Used to Assess	REDD+MF, BL-ARR
ESI Findings - Round 1 03 October 2013	Neither the REDD+MF framework nor the BL-ARR module specifies that the project area shall not be cleared of native ecosystems within the 10 year period prior to the project start date.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Neither the REDD+MF framework nor the BL-ARR module specifies that the project area shall not be cleared of native ecosystems within the 10 year period prior to the project start date. Please address.
Response from Methodology Developer 11 November 2013	In line with the procedure provided for WRC in REDD-MF we added language for ARR to Section 5.1. We also added a note to BL-ARR saying that VCS rules supersede CDM rules.
ESI Findings - Round 2 13 December 2013	Please clarify language added to 5.1 of VCS Methodology VM0007version20131104 to fully meet the requirement 4.2.1 ,Language added to section 5.1 states "Land defined as “forest” shall meet the VCS definition of forest. The boundary of the REDD activity shall be clearly delineated and defined and include only land qualifying as “forest” for a minimum of 10 years prior to the project start date". A forest does not necessarily constitute a "native ecosystem".

Round 2 NCR /CL / OFI 13 December 2013	NCR: Please clarify language added to 5.1 of VCS Methodology VM0007version20131104 to fully meet the requirement as it does not specifically state the project areas shall not be cleared of native ecosystems within the 10 year period prior to the project start date. 4.2.1
Response from Methodology Developer 20 February 2014	"Cleared" replaced with "Cleared of native ecosystems"
Final ESI Findings 11 March 2014	Response adequate and language has been added to section 5.1.

Item Number	22
VCS AFOLU Requirements Version 3.4 (ARR) (October 2013)	4.5.5 Where ARR or IFM projects include harvesting, the loss of carbon due to harvesting shall be included in the quantification of project emissions. The maximum number of GHG credits available to projects shall not exceed the long-term average GHG benefit. The GHG benefit of a project is the difference between the project scenario and the baseline scenario of carbon stocks stored in the selected carbon pools and adjusted for any project emissions of N2O, CH4 and fossil-derived CO2, and leakage emissions. The long-term average GHG benefit shall be calculated using the following procedure:
Evidence Used to Assess	BI-ARR, AR-ACM0003
ESI Findings - Round 1 03 October 2013	This requirement does not appear to be addressed in either the methodology or AR-ACM0003
Round 1 NCR /CL / OFI 03 October 2013	CL: The methodology does not appear to require that the maximum number of GHG credits available to projects shall not exceed the long-term average GHG benefit. Please show where this is addressed/calculated, or review the methodology to address.
Response from Methodology Developer 11 November 2013	The ARR procedures are intended to support restoration and conservation initiatives. Harvesting will not be part of the project scenario. Therefore, requirement 4.5.5 is not relevant. We added an applicability condition to REDD-MF (and BL-ARR) to narrow down the scope. Please note that we removed the condition that ARR project areas do not meet the VCS forest definition. This is not a requirement, as per 4.2.1 (AFOLU).
ESI Findings - Round 2 13 December 2013	Response sufficient, Section 4 of VCS Methodology VM0007version20131104 states "The with-project scenario does not involve the harvesting of trees. Therefore, procedures for the estimation of long-term average carbon stocks are not provided." .

Item Number	23
VCS AFOLU Requirements Version 3.4 (ARR) (October 2013)	4.6.9 Where deforestation increases outside the project area due to leakage from project activities, the effects of this deforestation on all carbon pools shall be assessed and quantified, unless determined to be de minimis (as set out in Section 4.3.3) or conservatively excluded (as set out in Section 4.3.4).
Evidence Used to Assess	BL-ARR, LK-ARR, AR-ACM0003, Estimation of the increase in GHG emissions attributable to displacement of pre-project agricultural activities in A/R CDM project activity
ESI Findings - Round 1 03 October 2013	Not clear from the methodology or selected CDM tools.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please clarify where it is required that all carbon pools shall be assessed and quantified, unless determined to be de minimis, resulting from increases in deforestation outside the project area due to leakage from project activities.

Response from Methodology Developer 11 November 2013	Language added to existing sentence Section 8.3 in MF: "The significance of leakage and the significance of carbon pools may be determined using T-SIG."
ESI Findings - Round 2 13 December 2013	Response sufficient, section 8.3 in VCS Methodology VM0007version20131104 states, "The significance of leakage and the significance of carbon pools may be determined using T-SIG."

Item Number	24
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	ARR activities that involve nitrogen fertilization, active peatland drainage or lowering of the water table depth, such as draining in order to harvest, are not eligible project activities, as they are likely to enhance net GHG emissions.
Evidence Used to Assess	REDD+ MF Section 4,d. GEST Section 4, l.
ESI Findings - Round 1 03 October 2013	N fertilization not mentioned.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please explicitly state N fertilization is not allowed.
Response from Methodology Developer 11 November 2013	We added the sentence to the ARR applicability conditions in REDD-MF.
ESI Findings - Round 2 13 December 2013	Response sufficient, Section 4 of VCS Methodology VM0007version20131104 states "The with-project scenario does not involve the application of nitrogen fertilizers." Finding closed.

Item Number	25
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	4.3.25 For project activities implemented on coastal wetlands, methodologies shall establish criteria and procedures for establishing the geographic boundary that considers projections of expected relative sea level rise. The procedures shall account for the potential effect of sea level rise on the lateral movement of wetlands during the project crediting period and the potential that the wetlands will migrate beyond the project boundary.
Evidence Used to Assess	REDD+ MF
ESI Findings - Round 1 03 October 2013	Unclear what defines domed peatlands.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please provide a definition of domed peatlands.
Response from Methodology Developer 11 November 2013	Definition provided
ESI Findings - Round 2 13 December 2013	Definition of domed peatlands could not be located in the methodology.

Round 2 NCR /CL / OFI 13 December 2013	NCR: Please provide reference to definition of domed peatlands within the methodology. .
Response from Methodology Developer 20 February 2014	Definition was provided in BL-PEAT
Final ESI Findings 11 March 2014	The module BL-PEAT now includes this definition for domed peatland: "Dome shaped peat landform usually located between interfluvial divides," with references. This establishes the type of landscape where domed peatlands exist, and differentiates it from coastal peatlands. The inclusion of the definition and references for further information satisfies this NCR. Finding closed.

Item Number	26
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	2) The long-term average climate variables influencing water table depths and the timing and quantity of water flow. The long-term average climate variables shall be determined using data from climate stations that are representative of the project area and shall include at least 20 years of data.
Evidence Used to Assess	BL-WRC section 5.3
ESI Findings - Round 1 03 October 2013	Methodology calls for 10 years of data
Round 1 NCR /CL / OFI 03 October 2013	NCR: The VCS AFOLU requirements call for 20 years of data, not 10. Please address.
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	The correction to module BL-WRC section 5.3 could not be verified. The document file provided for the round 2 assessment did not include an updated module BL-WRC .
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please provide evidence that module BL-WRC section 5.3 has been corrected to include 20 of long term climate data (i.e. The long-term average climate variables shall be determined using data from climate stations that are representative of the project area and shall include at least 20 years of data.) .
Response from Methodology Developer 20 February 2014	New version of BL_PEAT provided. Definition was added to Chapter 3.
Final ESI Findings 11 March 2014	New version of BL_Peat includes the correction to 20 years in section 5.3. Finding closed.

Item Number	27
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	1) AUWD: The criteria and procedures for identifying the baseline scenario shall require the methodology developer to reference a period of at least 10 years for modeling a spatial trend in conversion, taking into account the long-term average climate variables, and the observed conversion practices (eg, drainage including canal width, depth, length and maintenance). The long-term average climate variable shall be determined using data from climate stations that are representative of the project area and shall include at least 20 years of data.
Evidence Used to Assess	BL-WRC section 5.3
ESI Findings - Round 1 03 October 2013	Methodology calls for 10 years of data
Round 1 NCR /CL / OFI 03 October 2013	NCR: The VCS AFOLU requirements call for 20 years of data, not 10. Please address.
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	The correction to module BL-WRC section 5.3 could not be verified. The document file provided for the round 2 assessment did not include an updated module BL-WRC .
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please provide evidence that module BL-WRC section 5.3 has been corrected to include 20 of long term climate data (i.e. The long-term average climate variables shall be determined using data from climate stations that are representative of the project area and shall include at least 20 years of data.) .
Response from Methodology Developer 20 February 2014	New version of BL_PEAT provided.
Final ESI Findings 11 March 2014	New version of BL_Peat includes the correction to 20 years in section 5.3. Finding closed.

Item Number	28
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	2) APWD: The criteria and procedures for identifying the baseline scenario shall require the methodology developer to provide verifiable evidence to demonstrate that, based on government plans (for publicly owned and managed wetland), community plans (for publicly owned and community-managed wetland), concessionary plans (for publicly owned and concession holder managed) or landowner plans (for privately owned wetland), the project area was intended to be drained or otherwise converted. The annual rate and depth of drainage or rate of other conversion shall be based on the common practice in the area—that is, how much wetland is typically drained or converted each year by similar baseline activities.
Evidence Used to Assess	Covered in "BL-PL" section 1.2
ESI Findings - Round 1 03 October 2013	Unclear where this is addressed.

Round 1 NCR /CL / OFI 03 October 2013	CL: Please clarify where the procedures for identifying the baseline scenario address this requirement.
Response from Methodology Developer 11 November 2013	In our interpretation the REDD procedures cover the situation where forest occurs on peatland. Only for peatland conservation on non-forest land would requirement 4.4.12 for CIW be relevant. The table in CH2 limits the combinations with undrained peatland to forested land.
ESI Findings - Round 2 13 December 2013	Response sufficient. Finding closed.

Item Number	29
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	4.4.14 Many land use activities on wetlands (eg, aquaculture and agriculture) involve the exposure of wetland soils to aerobic decomposition through piling, dredging (expansion of existing channels) or channelization (cutting through wetland plains). Where relevant, WRC baseline scenarios shall account for such processes as they expose disturbed carbon stocks to aerobic decomposition thus increasing the rate of organic matter decomposition and GHG emissions that may continue for years from the stockpiles. Methodologies shall include credible methods for quantifying and forecasting GHG emissions from such degradation.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Does not appear to address fate of C in peat removed from ditches and piled on landscape, etc.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please address fate of C in peat removed from ditches and piled on landscape, etc.
Response from Methodology Developer 11 November 2013	Text added to BL-PEAT Section 5.3
ESI Findings - Round 2 13 December 2013	Response sufficient, text added to BL-Peat Section 5.3 states "Emissions from peat exposed to aerobic decomposition by spreading or piling following the establishment or maintenance of ditches may be taken into account by applying emission values from appropriate literature or conservatively be omitted." Finding closed.

Item Number	30
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	4.4.18 Where relevant, the criteria and procedures for identifying alternative baseline scenarios shall require the methodology developer to take into account current and historic management activities outside the project area that have significantly impacted or may significantly impact the project area, including the following:
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	CL: Please specifically require baseline to take activities on neighboring lands into account.

Response from Methodology Developer 11 November 2013	This requirements states 'where relevant' and the relevance is intended to be limited to coastal/tidal wetlands, where upstream activities may significantly impact the project area.
ESI Findings - Round 2 13 December 2013	The methodology developers are correct. This applies to coastal/tidal wetlands, not peat domes. Finding closed.

Item Number	31
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	No GHG emission reductions may be claimed for a given area of peatland for longer than the PDT.
Evidence Used to Assess	BL-WRC section 5.2,
ESI Findings - Round 1 03 October 2013	No formula given.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please insert formula in BL-WRC section 5.2
Response from Methodology Developer 11 November 2013	This equation is present in the binder that VCS compiled.
ESI Findings - Round 2 13 December 2013	The equation is present in the PDF binder. Finding closed.

Item Number	32
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	The PDT is considered part of the baseline and thus shall be reassessed with the baseline in accordance with Section 3.1.10.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Cannot find reference to this item in the methodology.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please show where this is addressed within the methodology.
Response from Methodology Developer 11 November 2013	In Section 5.2. we added "Since the PDT is part of the baseline assessment, it must be reassessed every 10 years".
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	33
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	Where relevant, the micro-topography of the project area (eg, the proportion of hummocks and hollows and vegetation patterns in peatlands) shall be considered. Net GHG emissions reductions shall be calculated using the same methods that are used for the baseline estimates, but using monitored data.
Evidence Used to Assess	BL-WRC section 5.1, 5.3
ESI Findings - Round 1 03 October 2013	Micro-topography is not specifically mentioned.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please discuss how microtopography will be considered.
Response from Methodology Developer 11 November 2013	Microtopography is not relevant for the BSL
ESI Findings - Round 2 13 December 2013	Response should include an explanation. RS_12/12/13
Round 2 NCR /CL / OFI 13 December 2013	CL: Please explain why microtopography is not relevant to the baseline. Is it covered in stratification? RS 12/12/13
Response from Methodology Developer 20 February 2014	Micro-topography inserted as proxy in BL-PEAT and X-STR, in line with language for other proxies listed.
Final ESI Findings 11 March 2014	Microtopography was inserted as a possible proxy for baseline emissions (BL-Peat, section 5.3) and as an indicator for stratification (X-STR, section 5(3)). Finding closed.

Item Number	34
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	4.5.33 RWE projects on peatland that include an activity designed specifically to reduce incidence and severity of fires shall deduct the amount of peat assumed to burn when estimating peat depletion times.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Deduction not discussed.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please address RWE projects on peatland that include an activity designed specifically to reduce incidence and severity of fires shall deduct the amount of peat assumed to burn when estimating peat depletion times.
Response from Methodology Developer 11 November 2013	Fire-related peat losses are addressed in modules X-STR and M-WRC

ESI Findings - Round 2 13 December 2013	Response sufficient, module M-WRC, section 1.5 discusses fire-related peat losses and are addressed with the following deduction, "The 20% Fire Reduction Premium is a rapid and conservative approach to acknowledging fire emissions reductions as a result of rewetting without having to develop complex baseline scenarios for peat fires. " Finding closed.

Item Number	35
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	Where peat depletion times are estimated based only on oxidation rates due to drainage, the outcome would be a longer period than when first subtracting the amount of peat that is considered to burn in the baseline.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Not mentioned.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please address peat depletion times based only on oxidation rates due to drainage.
Response from Methodology Developer 11 November 2013	This is not a requirement, but an explanation of 4.5.33, which related to projects that address fires. In absence of fire, E_peatburn would be 0 and PDT indeed longer (Eq. 7 of X-STR)
ESI Findings - Round 2 13 December 2013	The methodology developers are correct. NCR withdrawn. Finding closed.

Item Number	36
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	RWE projects on peatland shall assume that the PDT of leakage activities occurs over the length of the project crediting period if the PDT is longer than the project crediting period.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Not addressed.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The methodology did not address RWE projects on peatland which shall assume that the PDT of leakage activities occurs over the length of the project crediting period if the PDT is longer than the project crediting period.
Response from Methodology Developer 11 November 2013	In LK-ASU equation 14, LK-ASP equation 10 and LK-ME equation 9, the C_PDT is based on the carbon lost at peat depletion time (which may be longer than the crediting period) and this entire amount is considered to be lost when activity shifting occurs. Therefore, implicitly, the requirement is met.
ESI Findings - Round 2 13 December 2013	The equations mentioned in the leakage modules are based on carbon lost at depletion time. "The emission factor from peat drainage in the Leakage Belt is determined as the total amount of carbon that would be lost at Peat Depletion Time (PDT) in the Leakage Belt divided by the total undrained peatland area found within the Leakage Belt..." Finding closed.

Item Number	37
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	The land conversion agent can be an entity that has ownership of, management of, or legally sanctioned rights to use, multiple parcels of wetland within the country, or can be the most-likely-class of land conversion agent.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Need definition of 'agent' within the modules.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please include this definition of 'agent' within the modules.
Response from Methodology Developer 11 November 2013	This can only apply to APWD and thus to modules LK-ASP and LK-ME, not to LK-ASU. What's more, requirement 4.6.21 defines the meaning of land conversion agent but does not require a methodology to provide a definition of land conversion agent.
ESI Findings - Round 2 13 December 2013	The methodology authors are correct, there is no requirement to define "agent" within the modules. Confusion arose during the methodology review with the term, among more than one reviewer. Finding closed.

Item Number	38
VCS AFOLU Requirements Version 3.4 (WRC) (October 2013)	4.6.22 Wetland restoration projects including fire reduction activities, shall follow the requirements for accounting for fire under REDD, where land use changes are identified as the cause (or one of the causes) of anthropogenic fires in the project region.
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Cannot find reference to this item in the methodology.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please show where this is addressed within the methodology.
Response from Methodology Developer 11 November 2013	We could not identify fire-relevant requirements for REDD in the AFOLU requirements, despite the reference to them in 4.6.22.

Item Number	39
VCS Methodology Approval Process Version 3.5 (October 2013)	3.2.1 The developer shall prepare the methodology element documentation that will be subject to a public stakeholder consultation and independent assessment by two validation/ verification bodies. This means the developer shall prepare, in accordance with all the applicable VCS rules, the new methodology, methodology revision, module or tool, as applicable. The methodology element documentation shall state clearly the date on which it was issued and its version number. Methodologies and methodology revisions shall be prepared using the VCS Methodology Template and modules and tools shall be prepared using the VCS Module Template.

Evidence Used to Assess	Methodology VM0007, VCS webpage, Methodology V3.2 template, and Module V3.2 template
ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please ensure the methodology element documentation states clearly the date on which it was issued and its version number. Methodologies and methodology revisions shall be prepared using the VCS Methodology Template and modules and tools shall be prepared using the VCS Module Template (see NCR 4.1.3. on Standard 3.3 tab).
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Methodology element documentation states clearly the date on which it was issued and its version number. Finding closed.

Item Number	40
VCS Methodology Template	2 SUMMARY DESCRIPTION OF THE <METHODOLOGY>/<METHODOLOGY REVISION> Provide a brief summary description of the methodology/revision, including the main methodological steps. Indicate in the table below whether the methodology uses a project, performance or activity method for determining additionality, and a project or performance method for determining the crediting baseline (see the VCS Standard for further information on these methods).
Evidence Used to Assess	VM0007 section 2
ESI Findings - Round 1 03 October 2013	It is not specified if the project uses a, performance, project or activity method for determining additionality and baseline.
Round 1 NCR /CL / OFI 03 October 2013	NCR: As required please indicate in the appropriate table in the template whether the methodology uses a project, performance or activity method for determining additionality, and a project or performance method for determining the crediting baseline
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	REDD+MF 20131104.docx section 2 contains a table that clearly indicates the method of determining additionality and baseline. Finding closed.

Item Number	41
VCS Methodology Template	5 PROJECT BOUNDARY Describe the project boundary and identify the GHG sources, sinks and reservoirs included or excluded from the project boundary.
Evidence Used to Assess	VM0007 section 5
ESI Findings - Round 1 03 October 2013	Methodology describes project boundary and identifies the GHG sources, sinks and reservoirs included or excluded from the project boundary.

Round 1 NCR /CL / OFI 03 October 2013	OFI: Revise sentence in the fourth category of boundaries that shall be defined (page 13):
Response from Methodology Developer 11 November 2013	"and" removed at end of sentence.
ESI Findings - Round 2 13 December 2013	Sentence revised. Finding closed.

Item Number	42
VCS Methodology Template	6 PROCEDURE FOR DETERMINING THE BASELINE SCENARIO Describe the criteria and procedures for identifying alternative baseline scenarios and determining the most plausible scenario.
Evidence Used to Assess	VM0007 section 6, T-ADD
ESI Findings - Round 1 03 October 2013	Section 6 of the revised Methodology VM0007 was difficult to follow to assess this requirement, though it refers to an unchanged Module T-ADD to identify alternative baseline scenarios.
Round 1 NCR /CL / OFI 03 October 2013	CL: Revise section 6.1 of the methodology so that this requirement can be assessed. In particular, revise second paragraph in section 6.1 there appears to be a formatting problem with the text. OFI: The third paragraph of section 6.1 refers footnotes 1-3, it was not clear what was referred to by this statement.
Response from Methodology Developer 11 November 2013	Please clarify what the problem is. We see no issues in Section 6.1. The procedure refers to T-ADD which is the CDM tool listed in CH3. This tool has footnotes and footnotes 1 to 3 can be omitted.
ESI Findings - Round 2 13 December 2013	Reviewed responses from the methodology developer and section 6.1 of the methodology.
Round 2 NCR /CL / OFI 13 December 2013	CL: What the reviewer had thought was the "second paragraph", is actually a table of differences between the CDM language and VCS language. This was not clear in the methodology. That table is very useful, though it seems like a few more words in the lead up to that table or re-formatting the table in a way to clearly spell out its purpose would be helpful. OFI: The sentence containing the footnote reference is also clear, but adding the information in your response would be helpful to readers, “The procedure refers to T-ADD which is the CDM tool listed in CH3. This tool has footnotes and footnotes 1 to 3 can be omitted."
Response from Methodology Developer 20 February 2014	Section 6.1 amended.
Final ESI Findings 11 March 2014	Section 6.1 amended. Finding closed.

Item Number	43
VCS Methodology Template	8.1 Baseline Emissions Describe the criteria and procedures, including relevant equations, for the quantification of GHG emissions and/or removals for the selected GHG sources, sinks and/or reservoirs for the baseline scenario.
Evidence Used to Assess	VM0007 section 8, Modules BL-WRC (sections 5.2 and 6), BL-ARR
ESI Findings - Round 1 03 October 2013	BL-WRC section 5.2, Equation 1 is missing from the document.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please insert equation for the net CO2-equivalent emissions from the peat soil in the baseline scenario om section 5.2 of Module BL-WRC. OFI: There is an empty table in section 6 (page 10) of BL-WRC
Response from Methodology Developer 11 November 2013	NCR: This equation is present in the binder that VCS compiled / OFI: Done
ESI Findings - Round 2 13 December 2013	An updated file of module BL-WRC was not included in the zip file VM0007 modules.zip provided on 10/11/2013.
Round 2 NCR /CL / OFI 13 December 2013	Please provide an updated version of BL-WRC that includes changes addressing two outstanding findings: **NCR:** Please insert equation for the net CO2-equivalent emissions from the peat soil in the baseline scenario om section 5.2 of Module BL-WRC. **OFI:** There is an empty table in section 6 (page 10) of BL-WRC
Response from Methodology Developer 20 February 2014	New version of BL-PEAT provided
Final ESI Findings 11 March 2014	Findings closed: New version of BL-PEAT provided, with equation added to section 5.2 and table filled out in section 6.

Item Number	44
VCS Methodology Template	8.2 Project Emissions Describe the criteria and procedures, including relevant equations, for the quantification of GHG emissions and/or removals for the selected GHG sources, sinks and/or reservoirs for the project.
Evidence Used to Assess	VM0007 section 8.2
ESI Findings - Round 1 03 October 2013	The methodology does not appear to meet this requirement.
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please demonstrate how methodology describes the criteria and procedures, including relevant equations, for the quantification of GHG emissions and/or removals for the selected GHG sources, sinks and/or reservoirs for the project.
Response from Methodology Developer	Text added

11 November 2013	
ESI Findings - Round 2 13 December 2013	Text added to section 8.2 of VCS Methodology VM0007version20131104 addresses this requirement. Finding closed.

Item Number	45
VCS Methodology Template	9.3 Description of the Monitoring Plan Describe the criteria and procedures for obtaining, recording, compiling and analyzing data and information important for quantifying and reporting GHG emissions and/or removals relevant for the project and baseline scenario.
Evidence Used to Assess	VM0007 section 9.3, M-WRC, M-ARR
ESI Findings - Round 1 03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	CL: There appears to have been a formatting error on page 38, under the heading of c. WRC, please revise.
Response from Methodology Developer 11 November 2013	Work in progress, and related to other comment regarding the use of sub headers.
ESI Findings - Round 2 13 December 2013	Issue appears to have been addressed (now on page 39 of VCS Methodology VM0007version20131104). Finding closed.

Item Number	46
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC section 5.2
ESI Findings - Round 1 03 October 2013	Missing equation in Module BL-WRC
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please include Equation 1, in BL-WRC section 5.2. (The net CO2-equivalent emissions from the peat soil in the baseline scenario) is missing
Response from Methodology Developer 11 November 2013	This equation is present in the binder that VCS compiled.
ESI Findings - Round 2 13 December 2013	On December 4, 2013, the client sent an email with a web link on the VCS website (http://v-c-s.org/sites/v-c-s.org/files/Updatedbinder.pdf) for PDF versions of BL-WRC and Equation 1 is present. Finding closed.

Item Number	47
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC
ESI Findings - Round 1 03 October 2013	The title of this module implies it is widely applicable to WRC activities, when it is narrowly focused on a specific type of wetland in a limited geographical location.
Round 1 NCR /CL / OFI 03 October 2013	OFI: A more accurate title will save project developers' time.
Response from Methodology Developer 11 November 2013	We replaced 'WRC project activities' with 'peatland rewetting and conservation project activities in the tropics'; module code renamed to 'BL-PEAT'
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	48
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP, LK ASU, many places.
ESI Findings - Round 1 03 October 2013	The word *agent* appears to be used with varying definitions, or is being used in a confusing manner.
Round 1 NCR /CL / OFI 03 October 2013	CL: In LK-ASP, section 4, agent appears to be a practice or activity, elsewhere it is clearly used to denote a land manager. Please define the word *agent.*
Response from Methodology Developer 11 November 2013	In Section 4 (chapter 4) 'agent' occurs twice and this refers to 'land manager'. Actually in Section 5 (chapter 5) all occurrences of 'agent' refer to 'land manager' too. We do not see the issue here.
ESI Findings - Round 2 13 December 2013	
Round 2 NCR /CL / OFI 13 December 2013	OFI: Why not use land manager, still confusing to me. Under 5 Procedures, step 1 it says "for the deforestation agent" would saying "by the deforestation agent be better? Agent still looks like a practice.
Response from Methodology Developer 20 February 2014	For' replaced with 'by'. Agent is term explicitly used by the VCS AFOLU requirements.
Final ESI Findings 11 March 2014	Use of the term "agent" is understood in VCS AFOLU projects. "For" was replaced with "by" in module LK-ASP. Finding closed.

Item Number	49
General Technical Expert Comments	
Evidence Used to Assess	LK-ASU, p10, step 5.
ESI Findings - Round 1 03 October 2013	What is meant by the term *national forest?*
Round 1 NCR /CL / OFI 03 October 2013	CL: Please define the term national forest, as used in LK-ASU, p10.
Response from Methodology Developer 11 November 2013	There is no national forest, there is only national forest area, which is the total forest area in the country. We added this explanation at the first occurrence.
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	50
General Technical Expert Comments	
Evidence Used to Assess	BL-ARR, page 1
ESI Findings - Round 1 03 October 2013	Peat and mineral soils: What about mineral soils with layers of peat, and vice versa?
Round 1 NCR /CL / OFI 03 October 2013	Please explain procedures in cases where peat and mineral materials are interlayered.
Response from Methodology Developer 11 November 2013	Text added to X-STR and BL-PEAT to discern these strata as having their own emission characteristics.
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	51
General Technical Expert Comments	
Evidence Used to Assess	BL-ARR, section 4
ESI Findings - Round 1 03 October 2013	The term *domed peatland* is not universally known.

Round 1 NCR /CL / OFI 03 October 2013	NCR: Please define *domed peatland,* differentiating it from other peatlands.
Response from Methodology Developer 11 November 2013	Rephrased
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	52
General Technical Expert Comments	
Evidence Used to Assess	BL-ARR section 5
ESI Findings - Round 1 03 October 2013	The term non-soil compartment is not clear
Round 1 NCR /CL / OFI 03 October 2013	NCR: Please define *non-soil compartment.*
Response from Methodology Developer 11 November 2013	Defined as '(aboveground biomass and wood products)'.
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	53
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC section 5.1, bullet 1
ESI Findings - Round 1 03 October 2013	The term peat soil and peat are both used. Is there a difference?
Round 1 NCR /CL / OFI 03 October 2013	CL: Please use consistent terms.
Response from Methodology Developer 11 November 2013	Deleted 'carbon loss and'
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	54
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC section 5.1, bullet 6
ESI Findings - Round 1 03 October 2013	Below ground biomass is included with the peat soil component. How are mineral layers dealt with?
Round 1 NCR /CL / OFI 03 October 2013	CL: Is this valid when peat soil includes layers of mineral material?
Response from Methodology Developer 11 November 2013	Not when forest occurs on shallow peat; text added
ESI Findings - Round 2 13 December 2013	OK for comments but still a problem as BL-WRC was changed to BL-Peat and M-WRC was changed to M-PEAT be sure changes are made in all text, at present not the case
Round 2 NCR /CL / OFI 13 December 2013	OFI: Please make sure changes are made in all text, at present not the case (BL-WRC was changed to BL-Peat and M-WRC was changed to M-PEAT).
Response from Methodology Developer 20 February 2014	All changed into M-PEAT and BL-PEAT
Final ESI Findings 11 March 2014	References to the original titles of the modules was changed to M-PEAT and BL-PEAT. Finding closed.

Item Number	55
General Technical Expert Comments	
Evidence Used to Assess	LK-ECO
ESI Findings - Round 1 03 October 2013	LK-ECO module states that the applicability condition is that there is no hydrological connectivity between the project area and surrounding areas. Where in the methodology is this applicability condition mentioned?
Round 1 NCR /CL / OFI 03 October 2013	CL:The origin of this applicability condition is unclear.
Response from Methodology Developer 11 November 2013	We do not understand this comment. LK-ECO has its own applicability conditions. REDD-MF does not repeat all appl conditions in all modules.
ESI Findings - Round 2 13 December 2013	Please reference where it can be found.

Round 2 NCR /CL / OFI 13 December 2013	CL: Please reference where it can be found
Response from Methodology Developer 20 February 2014	LK-ECO, CH4 mentions: "Leakage caused by hydrological connectivity is avoided by project design and site selection, as outlined in Chapter 5".
Final ESI Findings 11 March 2014	Clarification Closed: The applicability condition is stated in LK-ECO, section 4. The main methodology mentions that all applicability conditions found in all modules must be met (REDD+MF, section 4). Finding closed.

Item Number	56
General Technical Expert Comments	
Evidence Used to Assess	M-WRC p 11, item d
ESI Findings - Round 1 03 October 2013	What about excluding animals from the 0.5 meter zone around the soil subsidence poles/devices?
Round 1 NCR /CL / OFI 03 October 2013	CL: Should efforts be made to exclude animal disturbance? Please clarify.
Response from Methodology Developer 11 November 2013	Rephrased
ESI Findings - Round 2 13 December 2013	Response sufficient, finding closed.

Item Number	57
General Technical Expert Comments	
Evidence Used to Assess	REDD+-MF; page 29
ESI Findings - Round 1 03 October 2013	The cross reference to Equation is incorrect.
Round 1 NCR /CL / OFI 03 October 2013	NCR - Reference to Equation 8 on page 29 is incorrect. Cross-reference should be to Equation 13.
Response from Methodology Developer 11 November 2013	Due to different page numbering we do not know which table is referred to. Moreover, the references to equation 8 on and around p29 seems to be correct. There is no parameter in these tables that occurs in equation 13. Please clarify.
ESI Findings - Round 2 13 December 2013	The reference to Equation 8 is in the second line at the top of page 30 of the current version. Equation 8 does not have the parameter now listed as Adjusted_NERREDD to which the text is referring to.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please correct reference to Equation 8 on page 30 or explain how the parameter Adjusted_NERREDD relates to parameters listed in Equation 8.

Response from Methodology Developer 20 February 2014	Should refer to Equation 13. 'Equation 8' replaced with 'Equation13'.
Final ESI Findings 11 March 2014	Correction has been made. Finding closed.

Item Number	58
General Technical Expert Comments	
Evidence Used to Assess	REDD+-MF
ESI Findings - Round 1 03 October 2013	The formatting of the footnote leads to confusion.
Round 1 NCR /CL / OFI 03 October 2013	OFI - Footnote 16 crosses over multiple pages (i.e. 28 -29). This formatting issue should be corrected as it leads to confusion and is inconsistent with how other references between modules are handled.
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	Corrections to footnote 16 address the OFI. Finding closed.

Item Number	59
General Technical Expert Comments	
Evidence Used to Assess	
ESI Findings - Round 1 03 October 2013	Consistency in terminology is required throughout the modules.
Round 1 NCR /CL / OFI 03 October 2013	NCR - The writer has in some cases deleted 'VCS PD' in favor for PD(e.g.. page 15); in other cases the writer has left VCS PD (e.g.. page 35). This implies reference to difference documents and therefore should be made consistent throughout the REDD+MF module.
Response from Methodology Developer 11 November 2013	Replaced all 'VCS PD' with 'PD'.
ESI Findings - Round 2 13 December 2013	A search of the module determined that the reference to the VCS PD has been replaced with PD in all cases. This issue is closed.

Item Number	60
General Technical Expert Comments	
Evidence Used to Assess	REDD+-MF

ESI Findings - Round 1 03 October 2013	Review of Module required for spelling mistakes, formatting and comments.
Round 1 NCR /CL / OFI 03 October 2013	OFI - Review of section "Uncertainty and Quality Management' required as it appears it is a cut and paste of a comment by "JC1..JC2..JC3.." etc. in many locations of the text.
Response from Methodology Developer 11 November 2013	"JC"s removed
ESI Findings - Round 2 13 December 2013	Editorial changes have been made as described. Finding closed.

Item Number	61
General Technical Expert Comments	
Evidence Used to Assess	E-BPB; Section 5, page 4
ESI Findings - Round 1 03 October 2013	It is not clear the reasoning behind the use of 'controlled burning' and 'uncontrolled fire' in Procedures Section of the module.
Round 1 NCR /CL / OFI 03 October 2013	CL: It does not appear that uncontrolled fire in forest remaining forest is accounted for. The reviewer is assuming that uncontrolled fire is equivalent to fire from natural events. The use of controlled and uncontrolled in this section is confusing as it is not clear why the distinction is required. A controlled fire in drained pet swamp forest is possible and would lead to emissions, yet this module reads as though such a situation is excluded. More clarity around the intent of this item/issue is required and clarifying text is needed.
Response from Methodology Developer 11 November 2013	Uncontrolled fire is only accounted for peat swamp forest; controlled fire in peat swamp forest is covered as forest remaining forest. Uncontrolled fire in non-peat forest is not covered by the additions provided by our team.
ESI Findings - Round 2 13 December 2013	Additional clarification provided is sufficient. Finding closed.

Item Number	62
General Technical Expert Comments	
Evidence Used to Assess	LK-ECO; Section 1, page 3
ESI Findings - Round 1 03 October 2013	Acronyms should be spelt out fully in the first instance
Round 1 NCR /CL / OFI 03 October 2013	CL: For clarity the acronym GEST should be spelt out fully.
Response from Methodology Developer 11 November 2013	This is a reference to another methodology in which title GEST is not spelled out.

ESI Findings - Round 2 13 December 2013	Response accepted. Finding closed.

Item Number	63
General Technical Expert Comments	
Evidence Used to Assess	LK-ECO; Section 4, page 3
ESI Findings - Round 1 03 October 2013	Guidance for addressing applicability condition is lacking
Round 1 NCR /CL / OFI 03 October 2013	NCR: The applicability conditions requires that "leakage caused by hydrological connectivity is avoided by project design and site selection". Reference to where guidance is provided in the modular framework on how to address this criteria should be made here to be consistent with other modules and to provide guidance to the developer and the validator/verifier.
Response from Methodology Developer 11 November 2013	We added 'as outlined in Chapter 5'.
ESI Findings - Round 2 13 December 2013	Adding the cross reference clearly directs the user to the section where the requirements for project design and site election are detailed. This improved clarity and closed this item.

Item Number	64
General Technical Expert Comments	
Evidence Used to Assess	LK-ECO; Section 5, page 3
ESI Findings - Round 1 03 October 2013	Guidance on what to do with data collected during monitoring is not provided.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The Section for Procedures for monitoring describe a requirement to monitor water leakage using water level gauges. It describes the requirement to take readings at the project boundary and compare with the hydrological assessment used to establish the buffer zone. This section does not describe what to do after the comparison, in particular what steps are required if the monitoring determines that the buffer zone is not adequate. In addition this Section should also be formatted to be Section 6 -Procedures for Monitoring.
Response from Methodology Developer 11 November 2013	First point: we added that if the proponent cannot demonstrate adherence to the criteria, the project fails; The last point: section headers applied from module template.
ESI Findings - Round 2 13 December 2013	The text said to be added could not be found in the module.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please add the suggested text or direct the reviewer to the location of the added text to close this item. A search for 'fails', adherence to criteria' yielded no results.

Response from Methodology Developer 20 February 2014	Text has been added.
Final ESI Findings 11 March 2014	Text has been added to Section 6.2 and makes it clear that the Project will fail if the criteria are not adhered to. Finding closed.

Item Number	65
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP;Section 5: Step 1: Option 1.3b, page 7.
ESI Findings - Round 1 03 October 2013	Whilst text describing the calculation process is useful, the equation should be included as well.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The calculation described at the top of page 7 should include the actual Equation prior to commencement of Step 2.
Response from Methodology Developer 11 November 2013	Equation added.
ESI Findings - Round 2 13 December 2013	Equation was added .

Item Number	66
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP; Section 6: page 12
ESI Findings - Round 1 03 October 2013	Field Measurements of volumetric carbon content of peat in the baseline scenario
Round 1 NCR /CL / OFI 03 October 2013	CL: the use of the term 'original field measurements' is not clear. Does this refer to site specific field measurements or allow for measurements in neighboring relevant areas?
Response from Methodology Developer 11 November 2013	Changed to 'project-specific field measurements'
ESI Findings - Round 2 13 December 2013	Finding Closed: Text addition is adequate to close issue. Search of module confirmed the changes had been made.

Item Number	67
General Technical Expert Comments	
Evidence Used to Assess	X-STR

ESI Findings - Round 1 03 October 2013	Recent references to remote sensing techniques should be cited.
Round 1 NCR /CL / OFI 03 October 2013	CL: Throughout the module older references are used to direct the user to best practice approaches (e.g. Congalton 1991). The more recent GOFC-GOLD would be considered the most up to date reference for remote sensing techniques in REDD projects. Why does the module make reference to this older published work.
Response from Methodology Developer 11 November 2013	Updated Congalton, R.G. (1991) by Congalton, Russell G., and Kass Green: Assessing the accuracy of remotely sensed data: principles and practices. CRC press, 2008. We could cite GOFC-GOLD, but they cite Congalton. For Jaenicke J, Rieley JO, Mott C, Kimman P, Siegert F (2008) there is no other more recent paper available.
ESI Findings - Round 2 13 December 2013	Response accepted. Finding closed.

Item Number	68
General Technical Expert Comments	
Evidence Used to Assess	X-STR; Section 2, Section 4.
ESI Findings - Round 1 03 October 2013	Grammatical and spelling errors lead to confusion in some sections.
Round 1 NCR /CL / OFI 03 October 2013	CL: The following text requires reviewing for clarity of intent: Section 2: "Available maps, field observations, remote sensing data and other official documentation may be used to differentiate peatland from non-peatland and thus to estimate the total area op peat within the project area or a reference area (Ap)." Section 4: "Peat depth and shall be derived as described in this module. Depth of burn scars is assessed following procedures in Module M-WRC."
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	Spelling mistakes have been corrected as described. Finding closed.

Item Number	69
General Technical Expert Comments	
Evidence Used to Assess	X-STR; Section 3
ESI Findings - Round 1 03 October 2013	The treatment of drains within the Project area is not fully understood
Round 1 NCR /CL / OFI 03 October 2013	NCR: The module states that The area of channels and ditches (Aditch-WPS for the project scenario and Aditch-BSL for the baseline scenario) must be quantified, but not explicitly mapped. It is not clear how the area of channels and ditches can be quantified without mapping them. It is also unclear how emissions from ditches and drains are monitored and accounted for in the baseline and project scenarios. See NCRs for BL-WRC and M-WRC.

Response from Methodology Developer 11 November 2013	The area of ditches can be taken as a fraction of the total area. See IPCC 2013 Wetlands supplement, to which now reference is made in the procedure.
ESI Findings - Round 2 13 December 2013	Original Finding Closed, New CL Issued: Accept response and addition of reference, however the Section of the IPCC Wetlands report where the procedure is described should be provided in the module.
Round 2 NCR /CL / OFI 13 December 2013	CL: Please add the relevant Section number when referencing the IPCC 2013 procedures.
Response from Methodology Developer 20 February 2014	Section 2.2.2.1' added
Final ESI Findings 11 March 2014	'The correct reference to the wetlands supplement has been added. The guidance provided is specify to state that the canals 'must be quantified and expressed as portion of the project area (cf. IPCC 2013 – Section 2.2.2.1), but not explicitly mapped'. Is this strong intention not to have the canals mapped intended? Or can the canals be mapped at the project still meet the methodology requirements? The finding is closed but the language is noted as being unnecessarily restrictive. Finding closed.

Item Number	70
General Technical Expert Comments	
Evidence Used to Assess	X-STR; Section 4
ESI Findings - Round 1 03 October 2013	Specific requirements for the development of the peat depth map should be improved.
Round 1 NCR /CL / OFI 03 October 2013	CL: This section of the module states that "In highly inaccessible areas, the peat surface elevation provides a conservative estimate of peat thickness (cf. Jaenicke et al. 2008)." Does this mean that peat depth measurements are then not required and the peat surface elevation map will suffice? If this is the case then clearly stating this would increase transparency.
Response from Methodology Developer 11 November 2013	Text added
ESI Findings - Round 2 13 December 2013	Added text to section improves clarity and leads to documented conservative outcome. Finding closed.

Item Number	71
General Technical Expert Comments	
Evidence Used to Assess	X-STR; Section 4
ESI Findings - Round 1 03 October 2013	Elements of the peat quantification should not be included in the stratification module.

Round 1 NCR /CL / OFI 03 October 2013	NCR: The calculations for the total stock and stock loss approach would be better suited to the BL-WRC module.
Response from Methodology Developer 11 November 2013	These calculations are needed to stratify peat areas for which the permanence criterion is not met and therefore placed in X-STR
ESI Findings - Round 2 13 December 2013	Response justifies the inclusion of thee equations in X-STR. Finding closed.

Item Number	72
General Technical Expert Comments	
Evidence Used to Assess	X-STR; Section 5
ESI Findings - Round 1 03 October 2013	It is not clear how activities/disturbances are dealt with in the buffer zone described in the X-STR module
Round 1 NCR /CL / OFI 03 October 2013	NCR: Calculations in modules provided do not provide guidance on how to treat disturbances in buffer zone with the exception of its use in ecological leakage. Please provide more information relating to how activities with a defined buffer zone are to treated. Is this considered separate strata in the Project?
Response from Methodology Developer 11 November 2013	Text added
ESI Findings - Round 2 13 December 2013	Finding Closed: Text added is sufficient to close this item. Finding closed.

Item Number	73
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC; Section 5.2
ESI Findings - Round 1 03 October 2013	Equation 1 is missing
Round 1 NCR /CL / OFI 03 October 2013	NCR: Whilst the parameters are listed the actual equation is missing from the module.
Response from Methodology Developer 11 November 2013	See above
ESI Findings - Round 2 13 December 2013	The equation is now included in the module and the equation appears to be presented correctly. The addition of this equation to the now re-named module is sufficient to close this item. Finding closed.

Item Number	74
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC; Equation 2,3,4
ESI Findings - Round 1 03 October 2013	Definition of Peat Depletion Time (PDT) is not included in X-STR
Round 1 NCR /CL / OFI 03 October 2013	NCR: The parameter description suggests that the definition of Peat Depletion Time is described in X-STR however a full description is not presented there. It is clear why PDT should be included in the X-STR module so additional guidance on this would be expected to be in this module.
Response from Methodology Developer 11 November 2013	We intended to indicate that the quantification of PDT is provided in X-STR; we changed the parameter description accordingly: 'estimated in Module X-STR'.
ESI Findings - Round 2 13 December 2013	Corrected text is sufficient to correctly direct the reader to where the PDT is calculated. The corrections are sufficient to close this item. Finding closed.

Item Number	75
General Technical Expert Comments	
Evidence Used to Assess	BL-WRC; Section 5.3
ESI Findings - Round 1 03 October 2013	Guidance/Requirements in brackets
Round 1 NCR /CL / OFI 03 October 2013	NCR: It is not clear if the experts are required to be local or preferably be local. The intent of the bracketed words needs to be clear in other modules as well.
Response from Methodology Developer 11 November 2013	We intended preferably local and changed the text accordingly.
ESI Findings - Round 2 13 December 2013	The clarifying text is sufficient to close this items. Finding closed.

Item Number	76
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 5.5,
ESI Findings - Round 1 03 October 2013	Frequency and impact of fire

Round 1 NCR /CL / OFI 03 October 2013	NCR: This section states that baseline fire frequency and impact can be assessed using historic data which should be gathered over 10-15 year period ending 2 year before the project start date and that procedures are provided in M-WRC. However, Section 1.4 of M-WRC refers the reader to E-BPB and there is no other reference in M-WRC regarding the historical data approach to assessing the impact of fire; only the FRP approach is described in detail. E-BPB does not provide any guidance on the historical data approach to defining the frequency and impact of fires and so this approach appears not to be described in any modules at this stage.
Response from Methodology Developer 11 November 2013	The guidance was concealed in the fire premium procedure (bullet point 1). We copied relevant text into BL-WRC.
ESI Findings - Round 2 13 December 2013	The additional text in Section 5.5 is sufficient however, please explain why the period 10-15 years is suggested. Having a large range provides opportunities for cherry picking as well as present potential ambiguities in the validation of the approach. Some reasoning behind the historical period year range should be provided or the historical period set to a specific time period.
Round 2 NCR /CL / OFI 13 December 2013	CL: Please provide some reasoning behind the historical period year range or set a specific time period.
Response from Methodology Developer 20 February 2014	There must be a minimum (10) but also a maximum (15). So anything between 10 and 15 is in order. '10-15 year period' replaced with 'period of minimum 10 to maximum 15 year'. That said, 10 years as a minimum is a fairly standard period employed by other methodologies when dealing with historic assessment of partly undocumented disturbance events such as unplanned deforestation. The AFOLU requirements do not provide guidance for relevant historic time period to determine fire occurrence in the baseline (e.g. see section 4.4.13 in AFOLU requirements).
Final ESI Findings 11 March 2014	The additional clarifying text adds a maximum and minimum time period which bounds the historical reference period more clearly. In the absence of specific guidance from VCS it is consistent in the minimum with other VCS methodologies and current thinking in REL development and allows flexibility for cloud cover issues and emerging jurisdictional programs. Clarifying text is sufficient to close this issue. Finding closed.

Item Number	77
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 6,
ESI Findings - Round 1 03 October 2013	Parameter table for Aburnt-BSL,i,t does not have any supporting information.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The parameter Area Burnt table is incomplete. A description, source of data and justification of choice of data should be completed. This item also relates to other findings on determining the baseline fire frequency and impact using the historical data approach or the Fire Reduction Premium approach.
Response from Methodology Developer 11 November 2013	There is no equation with this parameter in BL-WCR, therefore we removed it from the table.
ESI Findings - Round 2	Removal of the parameter is warranted. This parameter is addressed in E-BPB. Finding closed.

13 December 2013	

Item Number	78
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 6, M-WRC; Section 6,
ESI Findings - Round 1 03 October 2013	Empty Parameter Tables
Round 1 NCR /CL / OFI 03 October 2013	NCR: There are empty parameter tables in these modules at the start of Section 6. these should be removed.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Removal of redundant text completed. Finding closed.

Item Number	79
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 5.3
ESI Findings - Round 1 03 October 2013	Mapping requirements of historic drainage seems inconsistent between project types.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The mapping of historic drainage layout and accounting for emissions is required for RDP projects, however it is not clear why this is not required for CUPP projects as well. Please explain or include the requirement to map and accounting for historic drainage in the Project Area for CUPP projects.
Response from Methodology Developer 11 November 2013	In CUPP projects the historic drainage (if any) does not have any predictive value for the drainage situation in the baseline of the CUPP project.
ESI Findings - Round 2 13 December 2013	Text added to Section 5.4 provides additional clarity on the treatment of existing open water, however it is still not clear how a project will demonstrate new drainage (open water) if the open water at the project start is not spatially mapped. Please explain how the methodology allows the project developer to track any new open water areas, compared with those existing at the project start if there is no requirement to spatially delineate them at the project start
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please explain how new canals will be differentiated from old canals if the pre-project drainage is not spatially mapped.
Response from Methodology Developer 20 February 2014	Mapping is still not strictly required but the area must be assessed. Added: 'and therefore the area of these new channels and ditches must be determined.' We follow the language in IPCC wetlands supplement.

Final ESI Findings 11 March 2014	Response sufficient, the methodology developer must demonstrate that no drainage has occurred (this could possibly be demonstrated via mapping , but the methodology is not prescriptive in what can be deemed as demonstration). Finding closed.

Item Number	80
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 5.4
ESI Findings - Round 1 03 October 2013	The definition of open water bodies is not clear
Round 1 NCR /CL / OFI 03 October 2013	NCR: The use of the term 'open water' bodies is found to be confusing here. Is an open water body a manmade area? Please define this term and explain when an 'open water' body must be included in the accounting.
Response from Methodology Developer 11 November 2013	Open water bodies include canals and ditches, but also fish ponds and natural lakes. Text has been added to point out that accounting is necessary if open water bodies were created after the project start date (see below).
ESI Findings - Round 2 13 December 2013	Text added to the modules adds the requested clarity and is sufficient to close this item. Finding closed.

Item Number	81
General Technical Expert Comments	
Evidence Used to Assess	BL:WRC; Section 5.4
ESI Findings - Round 1 03 October 2013	Treatment of existing channels ad ditches in the baseline and project scenario
Round 1 NCR /CL / OFI 03 October 2013	NCR: This section states that 'GHG emissions fro channels and ditches will not be higher in the with-project scenario compared with the baseline scenario and therefore, GHG emissions from channels and ditches may be conservatively omitted from the GHG accounting". It is understood that the intent here relates to channels and ditches already existing at the project start date. Therefore this should be made clear that GHG emissions fro channels and ditches will not be higher in the with-project scenario compared with the baseline scenario and therefore, GHG emissions from channels and ditches existing at the project start date may be conservatively omitted from the GHG accounting. CL: What happens if in a CUPP project for example, these channels and ditches are expanded by a secondary agent of deforestation/degradation? Are these emissions not accounted for?
Response from Methodology Developer 11 November 2013	NCR: Additional language included. CL: With the above insertion the new channels and ditches will automatically be accounted for as per the provided procedures but we added 'GHG emissions from channels and ditches that are created after the Project Start Date need to be accounted using Equation 7'.
ESI Findings - Round 2 13 December 2013	Additional text provides the requested clarification. However it is still unclear how new disturbances will be reported if the existing drainage is not spatially mapped. See row 43 above.
Round 2 NCR /CL / OFI 13 December 2013	NCR: Please explain how new canals will be differentiated from old canals if the pre-project drainage is not spatially mapped.

Response from Methodology Developer 20 February 2014	See row 42
Final ESI Findings 11 March 2014	Response sufficient, the methodology developer must demonstrate that no drainage has occurred (this could possibly be demonstrated via mapping, but the methodology is not prescriptive in what can be deemed as demonstration). Finding closed.

Item Number	82
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 4, page 3
ESI Findings - Round 1 03 October 2013	Definition of peatland.
Round 1 NCR /CL / OFI 03 October 2013	NCR: For clarity suggest revising sentence to read 'The project area must meet the VCS definition of peatland.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Correction has been made. This improves clarity and closes the item. Finding closed.

Item Number	83
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 4, item d, page 4
ESI Findings - Round 1 03 October 2013	Reference within and between modules should be consistent
Round 1 NCR /CL / OFI 03 October 2013	OFI: Suggest making reference to LK-ECO at this point to be consistent with cross-referencing to other modules.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Correction has been made. This improves clarity and closes the item. Finding closed.

Item Number	84
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5,

ESI Findings - Round 1 03 October 2013	Equation 1 is missing from the module
Round 1 NCR /CL / OFI 03 October 2013	NCR: Whilst the parameters are listed the actual equation is missing from the module.
Response from Methodology Developer 11 November 2013	This equation is present in the binder that VCS compiled.
ESI Findings - Round 2 13 December 2013	The response is confusing, however the revised module does report Equation 1 in full. This equation appears to be reported correctly. Finding closed.

Item Number	85
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5,
ESI Findings - Round 1 03 October 2013	Heading formatting is incorrect
Round 1 NCR /CL / OFI 03 October 2013	NCR: The third level headings need to be updated to reflect Section 5 rather than Section 1.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Headings have been adjusted and therefore close this issue. Finding closed.

Item Number	86
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.3, page 6
ESI Findings - Round 1 03 October 2013	Definition of the Area of ditch and open water in the with project scenario should be clearer
Round 1 NCR /CL / OFI 03 October 2013	It is not clear if the parameter Aditch-WPS,I,t refers to the area defined in remote sensing or if it refers to the actual area of impact from the drainage defied in the hydrological modelling or by expert opinion. It is believed the latter is correct, however this should clearly described here to avoid confusion and under estimating the emissions from drainage.
Response from Methodology Developer 11 November 2013	A_ditch,i,t refers to the area of open water, i.e. the ditches themselves, which have their specific emission factors (see e.g. Jauhiainen & Silvennoinen 2012, Suo 63, 93-105) -- not to the area of hydrological impact of the drainage. A_ditch,i,t will result from the documented project measures (ditch blocking/infilling). This approach follows the IPCC 2013 Wetlands supplement

ESI Findings - Round 2 13 December 2013	The response provides sufficient explanation and clarifies the parameter. Finding closed.

Item Number	87
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.3, page 7
ESI Findings - Round 1 03 October 2013	Treatment of existing channels ad ditches in the baseline and project scenario
Round 1 NCR /CL / OFI 03 October 2013	NCR: this refers to other NCRS already issued in BL-WRC. It is not clear how the establishment of new canals in the project area is treated. Are they mapped and monitored through time? This may be required in the case of CUPP projects where the ex-post activities are not 100% successful. Some more detail or discussion on how this type of scenario is treated by the modules is required.
Response from Methodology Developer 11 November 2013	Text added to M-WRC Section 5.6 -- note that projects in which drainage occurs in the WPS are not eligible under VCS-PRC. Do we need stronger language?
ESI Findings - Round 2 13 December 2013	Text and language in Section 5.6 is sufficient. Finding closed.

Item Number	88
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.5, page 7
ESI Findings - Round 1 03 October 2013	Redundant text in Box related to Fore Reduction Premium
Round 1 NCR /CL / OFI 03 October 2013	CL: The text in the last sentence '.Because a shorter period would introduce too much chance in accounting' does not add value and raises more questions than answers so would suggest deleting. It is assumed that the requirement is to set the fire reference period to 10 years prior to the project start, however this section does not explicitly state this. Suggest text be revised to explicitly state requirement.
Response from Methodology Developer 11 November 2013	This box was added for the purpose of justification. We can also remove it entirely, although it does provide relevant background. We anyway removed the last 2 sentences.
ESI Findings - Round 2 13 December 2013	The removal of the last sentence is accepted, however, it is recommended that more guidance is provided regarding the timeframe over which the historical fire should be determined (see issue line 40 above). Why not just have 10 years over which the baseline is determined. Why have a range?
Round 2 NCR /CL / OFI 13 December 2013	CL: Please be more specific on the temporal period for determining the historical fire rate. When is it ok to use just 10 years ad why/when do you apply 15 years?

Response from Methodology Developer 20 February 2014	There must be a minimum (10) but also a maximum (15). So anything between 10 and 15 is in order. '10-15 year period' replaced with 'period of minimum 10 to maximum 15 year'
Final ESI Findings 11 March 2014	The response provided does not address the finding. Why is the temporal period for determining the historical fire rate inconsistent with the other modules (avoided deforestation module BL-UP requires 3 time slices, must be no less than 3 years apart covering no more than 12 years)? Please include more guidance and specificity, in defining these time periods as is done in other modules, or define it the same as other modules. For consistency between modules it is suggested the historical baseline temporal requirements should be consistent with those required by the BL-UP module, or an explanation should be provided as to why the BL-UP baseline temporal requirements are not appropriate to the Peat module. Finding closed. More details of this finding are found in the Resolution of Findings section.

Item Number	89
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.5, page 10
ESI Findings - Round 1 03 October 2013	Cancellation of the fire Reduction Premium
Round 1 NCR /CL / OFI 03 October 2013	NCR: This section states that if non-catastrophic fires occur in the with-project scenario then the premium is cancelled for the entire project or individual sub-project. It is assumed that this means cancelled for the year the fire occurred only and not the 'entire project credit period'. Some clarifying text should be added here as to the intent/duration of the cancellation of the Fire Premium.
Response from Methodology Developer 11 November 2013	The statement is correct: the fire premium is cancelled for the entire project if anthropogenic fires occur during the project
ESI Findings - Round 2 13 December 2013	Clear and accepted. Item is closed.

Item Number	90
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.5, page 10
ESI Findings - Round 1 03 October 2013	How are adjustments from non-catastrophic fires made.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The methodology states that 'in the case of non-catastrophic fires' adjustments shall be made for subsequent changes in carbon store and GHG fluxes'. However there is no guidance on how these adjustments are made. Text should be added to guide the user through the equations/approach as to how these adjustments are made.

Response from Methodology Developer 11 November 2013	The adjustments pertain to stratification and reference has been added to X-STR
ESI Findings - Round 2 13 December 2013	Adding the cross referencing assist in directing the user to the relevant module and is consistent with the treatment of cross referencing between modules. Finding closed.

Item Number	91
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.5, page 10
ESI Findings - Round 1 03 October 2013	Definition of bi-monthly monitoring of water table should be made clear.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The term bi-monthly can mean both twice a month or once every two months. The intent of the methodology in terms of bi-monthly monitoring should be more specifically defined.
Response from Methodology Developer 11 November 2013	Rephrased
ESI Findings - Round 2 13 December 2013	The edits to the text lead to explicit monitoring reporting in any language reducing ambiguity. Finding closed.

Item Number	92
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.6, page 10,11
ESI Findings - Round 1 03 October 2013	Linking monitoring parameters to equations should be made clearer.
Round 1 NCR /CL / OFI 03 October 2013	OFI: For transparency the parameters monitored and associated equations for which the monitoring is related could be better linked in this section.
Response from Methodology Developer 11 November 2013	Not clear what exactly is meant here. But perhaps the new version of W-WRC meets the request.
ESI Findings - Round 2 13 December 2013	Corrections made to the new M-Peat module are sufficient. Finding closed.

Item Number	93
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.6, page 11

ESI Findings - Round 1 03 October 2013	Prescriptive advice for monitoring is out of place with the rest of the module
Round 1 NCR /CL / OFI 03 October 2013	CL: The advice provided in section d: Monitoring soil subsidence is very prescriptive and somewhat out of place compared with advice on other parameters. Section of this advice appears to be problematic. In particular how i=to install poles/dipwells. How can one install a dipwell if '..a perimeter of 0.5m around the pole should not be entered by people before, during or after installation'? This text appears more appropriate for SOPs rather than methodology modules.
Response from Methodology Developer 11 November 2013	Rewritten to make more in line with the other monitoring procedures
ESI Findings - Round 2 13 December 2013	Corrections to the text make this section more inline with methodology procedures rather than fieldwork SOPs. Finding closed.

Item Number	94
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.6, page 12
ESI Findings - Round 1 03 October 2013	Duration of subsidence monitoring requires clarity
Round 1 NCR /CL / OFI 03 October 2013	CL: The requirements for monitoring of subsidence states '.shall be carried out over a period of at least 24 months to cover intra-and inter annual variability'. Does this mean that monitoring of subsidence does not need to continue if 24 months of data have been collected? What data are used in the period 1-24 months in the calculations?
Response from Methodology Developer 11 November 2013	Text added; this requirement only applies if subsidence measurements are used to establish emission factors to be associated with other proxies.
ESI Findings - Round 2 13 December 2013	Clarifying text added is sufficient to address the ambiguity and link the measurements with the calculations. Finding closed.

Item Number	95
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 5.6, page 14
ESI Findings - Round 1 03 October 2013	Is the consistent use of bulk density figures required ex-ante and ex-post.
Round 1 NCR /CL / OFI 03 October 2013	NCR: It is clear that the project can apply either literature or site specific figures for bulk density, however it is not clear if the figures for bulk density have to be the same in ex-ante and ex-post calculations. As this is a critical parameter for peat emissions guidance on this should be made explicit in the module.

Response from Methodology Developer 11 November 2013	Requirement added that CC and BD shall be re-assessed at least every 10 years.
ESI Findings - Round 2 13 December 2013	Addition of the last sentence in Section 5.6 is clear of the intent and use of CC and BD. Finding closed.

Item Number	96
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 6
ESI Findings - Round 1 03 October 2013	Parameter Fox could not be traced back to an Equation.
Round 1 NCR /CL / OFI 03 October 2013	NCR: The parameter Fox in the parameter tables could not be traced back to an equation in the M-WRC module. Please remove or add the required equation.
Response from Methodology Developer 11 November 2013	Removed from table.
ESI Findings - Round 2 13 December 2013	Correction/deletion sufficient to close this NCR. Finding closed.

Item Number	97
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 6
ESI Findings - Round 1 03 October 2013	On site peat measurement of burn depth
Round 1 NCR /CL / OFI 03 October 2013	CL: There appears in this module no option for the project to measure and apply in the calculations on site burn depth and that a reliance on literature values is all that is required. Is this intended?
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	Clarifying text is sufficient to increase clarity on how fire burn depth can be determined. This approach is consistent with best practice at this time. Finding closed.

Item Number	98
General Technical Expert Comments	
Evidence Used to Assess	M-WRC; Section 6

ESI Findings - Round 1 03 October 2013	The Eproxy-CO2,i,t parameter table appears to be incomplete
Round 1 NCR /CL / OFI 03 October 2013	NCR: The Eproxy-CO2,i,t parameter table should include information consistent with Eproxy-CH4,i,t, particularly in relation to the source of data.
Response from Methodology Developer 11 November 2013	Text added
ESI Findings - Round 2 13 December 2013	Clarifying text added is sufficient. Finding closed.

Item Number	99
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP; Section 5, Option 1.3b, page 7
ESI Findings - Round 1 03 October 2013	Supporting Equations should be defined in the module along side descriptive text.
Round 1 NCR /CL / OFI 03 October 2013	NCR: This section provides sufficient description of the approach, however the calculation described should be presented as an Equation for calculating NewR,it.
Response from Methodology Developer 11 November 2013	See row 28
ESI Findings - Round 2 13 December 2013	Equation added. Finding closed.

Item Number	100
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP; Section 5, Part 3: The special case of peatlands. Step 3
ESI Findings - Round 1 03 October 2013	Supporting Equations should be defined in the module alongside descriptive text.
Round 1 NCR /CL / OFI 03 October 2013	NCR: This section provides sufficient description of the approach, however the calculation described should be presented as an Equation for calculating Lkpeat if the agent has been identified.
Response from Methodology Developer 11 November 2013	Equation added
ESI Findings - Round 2 13 December 2013	The equation added is sufficient . Finding closed.

Item Number	101
General Technical Expert Comments	
Evidence Used to Assess	LK-ASP; Section 6, term VCpeat
ESI Findings - Round 1 03 October 2013	The term 'original field measurements' is unusual terminology
Round 1 NCR /CL / OFI 03 October 2013	CL: Is the term 'original field measurements' equivalent to project specific field measurements?
Response from Methodology Developer 11 November 2013	See row 29
ESI Findings - Round 2 13 December 2013	Clarification provided is sufficient. Finding closed.

Item Number	102
General Technical Expert Comments	
Evidence Used to Assess	X-UNC; Section 2 and Section 4.
ESI Findings - Round 1 03 October 2013	Repetitive text regarding treatment of uncertainty in ARR activities should be addressed
Round 1 NCR /CL / OFI 03 October 2013	OFI: The following text is repeated in Section 2 and Section 4. Suggest the text in Section 4 is redundant. "Uncertainty in the estimation of emissions and removals from ARR project activities are treated by applying deduction rates assigned using the Clean Development Mechanism Methodological Tool “AR-TOOL 14 Estimation of carbon stocks and change in carbon stocks of trees and shrubs in A/R CDM project activities.”
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Edits have been made as described. Finding closed.

Item Number	103
General Technical Expert Comments	
Evidence Used to Assess	X-UNC; page 6
ESI Findings - Round 1	Consistency in terminology of REDD or REDD+ is required throughout the modules.

03 October 2013	
Round 1 NCR /CL / OFI 03 October 2013	NCR: In some modules the terminology is REDD in others REDD+. The acronyms need to be consistently reported in all modules.
Response from Methodology Developer 11 November 2013	Note that the general methodology is for REDD+ but the activity can be REDD in combination with WRC and ARR. In such instances we use 'REDD' without the plus.
ESI Findings - Round 2 13 December 2013	Response accepted. Finding closed.

Item Number	104
General Technical Expert Comments	
Evidence Used to Assess	Section 1 - Sources
ESI Findings - Round 1 03 October 2013	The methodology states that it is using: VM00xx: Baseline and monitoring methodology for the rewetting of drained peat lands used for peat extraction, forestry or agriculture based on GEST (under validation)
Round 1 NCR /CL / OFI 03 October 2013	CL- ensure that this new methodology has been validated before completing the revision to REDD+MF.
Response from Methodology Developer 11 November 2013	No response from Methodology Developer provided
ESI Findings - Round 2 13 December 2013	
Round 2 NCR /CL / OFI 13 December 2013	CL- ensure that this new methodology has been validated before completing the revision to REDD+MF.
Response from Methodology Developer 20 February 2014	Validation of that methodology is underway and we expect its approval before the approval of REDD+MF. 1st and 2nd validator can review towards the end of the validation period.
Final ESI Findings 11 March 2014	Response sufficient. Finding closed.

Item Number	105
General Technical Expert Comments	
Evidence Used to Assess	Section 3 - Definitions, Table 1 of REDD+MF
ESI Findings - Round 1 03 October 2013	Table 1 of REDD+MF states that Modules marked with an X are excluded, but go on to reference other Modules that include procedures that must be followed. For example Module X-STR is excluded from use for ARR projects and is indicated with X*** in Table 1 indicating that required procedures are found in Modules BL-ARR and M-ARR. No procedures for following X-STR are included in BL-ARR and M-ARR.

Round 1 NCR /CL / OFI 03 October 2013	NCR - please remove references to required procedures in Table 1, or include these procedures in the referenced Modules.
Response from Methodology Developer 11 November 2013	Modules BL-ARR and M-ARR refer to the A/R CDM methodology AR-ACM0003. AR-ACM0003 includes procedures for uncertainty assessment. To avoid the apparent confusion we added to Chapter 5: 'Procedures for the estimation of uncertainty for ARR project activities are provided in AR-ACM0003'.
ESI Findings - Round 2 13 December 2013	Satisfied the NCR. This change provides clarity in the referenced modules. Finding closed.

Item Number	106
General Technical Expert Comments	
Evidence Used to Assess	Section 4 - Applicability Conditions. C-ARR
ESI Findings - Round 1 03 October 2013	C-ARR states that: Procedures for estimating carbon stock changes in ARR project activities are provided in BL-ARR and M-ARR. Where exclusion of project activities on wetlands exist in the applicability conditions of methodologies and tools, these can be neglected for the purpose of their use within this Methodology Framework, as accounting procedures for the peat soil are provided in BL-WRC and M-WRC.
Round 1 NCR /CL / OFI 03 October 2013	CL - please clarify the underlined portion of this applicability condition. To the validator, this is stating that exclusions in applicability conditions can be neglected.
Response from Methodology Developer 11 November 2013	Indeed this applicability condition outlines that if a methodology or tool states that it cannot be applied by project activities on wetlands, that this exclusion can be ignored.
ESI Findings - Round 2 13 December 2013	Just wanted to make sure that this was not ambiguous to the developer of this methodology. Finding closed.

Item Number	107
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Project Boundary
ESI Findings - Round 1 03 October 2013	The title of Section 5 in the revised module is "Project Boundary". The title of Section 5 in the current version of the module is "Procedures" but is not a tracked change.
Round 1 NCR /CL / OFI 03 October 2013	CL - please track this change from the current version of this methodology.
Response from Methodology Developer 11 November 2013	This is because we were to apply the new VCS template for modules. We felt that the change was obvious and did not need to be tracked.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	108
General Technical Expert Comments	
Evidence Used to Assess	Section 3 - Definitions, Section 5.1 - Geographical boundaries b. REDD
ESI Findings - Round 1 03 October 2013	The term "dereference region" is not found in the VCS Program Definitions or the VM007 methodology. A new term "Reference Region for Deforestation" is used in Section 5 of the revised module.
Round 1 NCR /CL / OFI 03 October 2013	CL - please define Reference Region for Deforestation in Section 3. See CL under X-UNC.
Response from Methodology Developer 11 November 2013	The procedure in Section 5.1 refers to module BL-UP for detailed procedures and this module also provides the definition. We added that the term is defined in BL-UP. We had added 'for deforestation' because module BL-PEAT also uses a reference region and provides a definition of the term.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	109
General Technical Expert Comments	
Evidence Used to Assess	Section 5.2 - Temporal boundaries, a. General
ESI Findings - Round 1 03 October 2013	A statement is made that is not correct, that the project crediting period is equivalent to the project lifetime. "which under the VCS is equivalent to the project lifetime". The project lifetime is not defined in the VCS Program Definitions. Project Crediting Period is defined by the methodology developer as 20-200 years and included in the PD, and can be renewed.
Round 1 NCR /CL / OFI 03 October 2013	NCR - this section of the revised methodology creates new definitions that must be consistent with the VCS Program Definitions.
Response from Methodology Developer 11 November 2013	Removed
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	110
General Technical Expert Comments	
Evidence Used to Assess	Section 5.3 - Carbon pools b. REDD
ESI Findings - Round 1 03 October 2013	This section states. "The carbon pools (and corresponding methodology modules) included in or excluded from the project boundary of REDD project activities are shown in Table 1". Table 1 is the "List of modules/tools and determination of when module/tool use is mandatory (M) or optional (O)", found in Section 3 of the revised methodology, and does not include carbon pools for REDD activities.

Round 1 NCR /CL / OFI 03 October 2013	NCR - no Table was found that includes the carbon pools for REDD activities.
Response from Methodology Developer 11 November 2013	The section 'Pools' in this table does however refer to pools, albeit via the modules (C-AB, C-D, etc) relevant for these pools.
ESI Findings - Round 2 13 December 2013	Accepted this NCR. This was a misunderstanding. Finding closed.

Item Number	111
General Technical Expert Comments	
Evidence Used to Assess	Section 6. - determining the most likely baseline scenario
ESI Findings - Round 1 03 October 2013	The revised methodology states, "Footnote No 1-3 can be omitted" but no document is referenced. No such footnote was found in T-ADD. No date was listed for the referenced AFOLU Guidance document.
Round 1 NCR /CL / OFI 03 October 2013	CL - please provide the name of the document where this footnote can be found. Also, please provide the date for the following document - "AFOLU Guidance: Additional guidance for VCS Afforestation, Reforestation and Revegetation projects using CDM Afforestation/Reforestation Methodologies"
Response from Methodology Developer 11 November 2013	In the tool T-ADD' was added to make clear where the footnotes are located. Note that in this revision T-ADD is the "Combined tool to identify the baseline scenario and demonstrate additionality in A/R CDM project activities". Not the VCS approved tool.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	112
General Technical Expert Comments	
Evidence Used to Assess	Section 8.4 - Summary of GHG Emissions and Removals a. General
ESI Findings - Round 1 03 October 2013	This is the first place where REDD+ (not just REDD) show up in the module. The variable REDD+ is used throughout this section of the revised module.
Round 1 NCR /CL / OFI 03 October 2013	CL - Define REDD+ and ensure it is used consistent with this definition throughout the revised methodology.
Response from Methodology Developer 11 November 2013	REDD+ is first used in CH2 and in CH3 it is described just above Table 1.
ESI Findings - Round 2 13 December 2013	Accepted. All now reference REDD+. Finding closed.

Item Number	113
General Technical Expert Comments	
Evidence Used to Assess	Section 8.4 - Summary of GHG Emissions and Removals b. REDD
ESI Findings - Round 1 03 October 2013	Formula (2) is not clear. Variables are included that are not defined, and the reference to the M-MON is not clear.
Round 1 NCR /CL / OFI 03 October 2013	NCR - please correct/clarify formula (2)
Response from Methodology Developer 11 November 2013	We do not understand this NCR. All parameters are defined and M-MON is renamed to M-REDD (the latter has been approved by the VCS).
ESI Findings - Round 2 13 December 2013	The changes made to this formula create the requested clarity. Finding closed.

Item Number	114
General Technical Expert Comments	
Evidence Used to Assess	Section 8.4 - Summary of GHG Emissions and Removals. E. Calculation of VCS Buffer.
ESI Findings - Round 1 03 October 2013	This section includes a new formula variable "NGR" that defines this as NET GHG REMOVALS in ARR projects, but then uses this variable to reference Net GHG Emission Reductions and Removals in e. calculation of VCS buffer. NERREDD+ should be emission removals and emission reductions. Anytime REDD+ is used should include emission reductions and removals. REDD and WCR activities are emission reductions only, and ARR activities are emission removals only.
Round 1 NCR /CL / OFI 03 October 2013	NCR - Ensure that the use and description of the variable NGR is consistent in the revised methodology.
Response from Methodology Developer 11 November 2013	We removed 'net' from the sentence 'net GHG emissions reductions and removals '. Note that ARR projects are not necessarily removals only, because emissions sources may exist. The balance between removals and emissions should be a net removal though.
ESI Findings - Round 2 13 December 2013	Removing "net" provides clarity and consistency. Finding closed.

Item Number	115
General Technical Expert Comments	
Evidence Used to Assess	Section 8.4 - Summary of GHG Emissions and Removals
ESI Findings - Round 1 03 October 2013	"b. uncertainty analysis" is out of sequence in this section.

Round 1 NCR /CL / OFI 03 October 2013	CL - ensure the lettering of new sections is sequenced correctly.
Response from Methodology Developer 11 November 2013	Corrected
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	116
General Technical Expert Comments	
Evidence Used to Assess	Section 9.3 Description of Monitoring Plan - Task 1 c. WRC
ESI Findings - Round 1 03 October 2013	Symbols are used that make this section unclear.
Round 1 NCR /CL / OFI 03 October 2013	CL - ensure that this section is clear. The validator is not sure why symbols are used.
Response from Methodology Developer 11 November 2013	Problem with funny symbols resolved.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	117
General Technical Expert Comments	
Evidence Used to Assess	REDD+MF Methodology
ESI Findings - Round 1 03 October 2013	Throughout the revised REDD+MF module, when LK-ASP is referred to, it is only defined as planned deforestation, and does not include planned degradation.
Round 1 NCR /CL / OFI 03 October 2013	CL - ensure that when LK-ASP is used, that it includes planned deforestation and planned degradation - like the title of module LK-ASP indicates.
Response from Methodology Developer 11 November 2013	REDD-MF on p3 mentions: "Hereafter in this module and all other modules in methodology VM0007 applied to Avoiding Planned Deforestation projects, “planned deforestation” refers to both planned deforestation and planned degradation.", but nevertheless we added '/degradation' in a couple of places.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	118
General Technical Expert Comments	
Evidence Used to Assess	Title of LK-ASP VM0009
ESI Findings - Round 1 03 October 2013	The title of this module has been changed to include planned deforestation and planned degradation, but nowhere in the revised methodology is the term "planned degradation" used.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please change the title of this methodology or explain in the Summary Description of the Module how planned degradation is being used in the revised module.
Response from Methodology Developer 11 November 2013	The original title of the module included both planned deforestation and planned degradation and we did not change this. See further row 81. We added to LK-ASP chapter 2 that “planned deforestation” refers to both planned deforestation and planned degradation."
ESI Findings - Round 2 13 December 2013	Change made to the Summary Section of this module. Also noted change referenced on row 81 and section 2. Finding closed.

Item Number	119
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures Part 2, Step 2
ESI Findings - Round 1 03 October 2013	"Alternative lands" is defined in Part 2, Step 2 then the term "alternative lands" is used in Part 2, Step 4 without defining this new term.
Round 1 NCR /CL / OFI 03 October 2013	CL: Please ensure that the term "alternative lands" is used consistently throughout the revised module, and define "alternative lands".
Response from Methodology Developer 11 November 2013	The module LK-ASP now consistently uses the term 'alternative area', for which a definition is provided.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	120
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures Part 3, Step 1

ESI Findings - Round 1 03 October 2013	The revised module states "Where the deforestation agent has been identified, the total carbon lost at Peat Depletion Time (Cpeatloss,tPDT) in the undrained peat land in all of the agent´s concessions, as well as the PDT itself, shall be estimated using the principles in Equations (1) to (13), as applicable, in Module X-STR. Note that this option may only be applied if the identified agent is not expected to obtain any new concessions during the baseline period, or if information on all such new concessions is available at project start, in which case it shall be used in this Step. Otherwise, the procedure applied in cases where only the agent class is identified (described below) shall be used assuming that those areas under management of the identified agent at project start are part of the alternative areas in Part 2, Step 2, above. If only the agent class has been identified, the estimation of Cpeatloss,tPDT shall be carried out in the forested alternative areas in the country where the production of the identified commodity is feasible according to Step 1 of Part 2 above. "
Round 1 NCR /CL / OFI 03 October 2013	CL - To the validator, this part of the procedure is poorly worded and ambiguous. Please rewrite.
Response from Methodology Developer 11 November 2013	Text has been amended and hopefully sufficiently improved.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	121
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Definition of the boundary of the Leakage Belt, and through Section 5 and 6 of the revised methodology
ESI Findings - Round 1 03 October 2013	The revised module requires to, "Follow instructions and guidance in Module M-REDD." The validator is only aware of existence of module M-MON.
Round 1 NCR /CL / OFI 03 October 2013	CL - please provide clarity on the module that must be used. The validator is not aware of a module titled M-REDD. VMD0015 is M-MON.
Response from Methodology Developer 11 November 2013	M-MON will be renamed to M-REDD by the VCS.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	122
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedure, Step 5

ESI Findings - Round 1 03 October 2013	The revised module states, "In cases where the total available national forest area for unplanned deforestation (AVFOR) identified in Step 2 contains undrained peat land, methodology developers shall account for possible emissions from peat land drainage linked to activity shifting activities to the Leakage Belt and outside the Leakage Belt and project area. Note that as activity shifting to peat land areas may happen regardless of whether the project area contains peat land or not, all projects located in countries with peat land shall carry out the estimations presented in this step, unless it can be demonstrated that peat lands are not suitable for the baseline deforestation activities or that baseline deforestation agents do not usually drain peat lands in the country in order to carry out their activities. "
Round 1 NCR /CL / OFI 03 October 2013	CL - this statement is long and wordy, and difficult to understand. Please rewrite.
Response from Methodology Developer 11 November 2013	Text has been amended and hopefully sufficiently improved.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	123
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedure, Step 5
ESI Findings - Round 1 03 October 2013	The proportion of undrained peat land areas vis à vis the total area of the Leakage Belt represents the probability of leakage affecting such areas and is estimated as follows:
Round 1 NCR /CL / OFI 03 October 2013	CL - The revised module makes reference to the Leakage Belt, in the Leakage Belt, and outside of the Leakage Belt. The underlined part of this statement is not clear. Please rewrite.
Response from Methodology Developer 11 November 2013	Text has been amended and hopefully sufficiently improved.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	124
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures 3. Market Effects Leakage ….. Peat land Drainage
ESI Findings - Round 1 03 October 2013	The term "market leakage forest" is used in this section for the first time but has not been defined in Section 3 - Definitions. This seems to be the same as a Leakage Belt on drained peat land?
Round 1 NCR /CL / OFI 03 October 2013	NCR - please define the term "market leakage forest"

Response from Methodology Developer 11 November 2013	Definition added
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	125
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures 3. Market Effects Leakage ….. Peat land Drainage
ESI Findings - Round 1 03 October 2013	CMLF is used in EQs 9, 11, and 12 and defined as carbon in commercial species in 'market leakage forests'. Commercial species vary depending on operability and proximity to commercial markets, e.g. mills and ports. Commercial wood products, e.g. sawlogs and pulpwood have different merchantability and commercial markets and may have different operability due to economic constraints, e.g. logging equipment and terrain constraints, and legal constraints such as water protection laws or export laws.
Round 1 NCR /CL / OFI 03 October 2013	NCR - please define the term "commercial species" and list possible sources of evidence required to support the estimate that is used.
Response from Methodology Developer 11 November 2013	Definition added and for that purpose the definition of 'commercial markets' in footnote 1 was moved to this chapter as well.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	126
General Technical Expert Comments	
Evidence Used to Assess	Title of module.
ESI Findings - Round 1 03 October 2013	The title of this module has been changed.
Round 1 NCR /CL / OFI 03 October 2013	OFI - the validator is not sure why the title of this revised module was changed to be specific to REDD and WRC. It is stated that in Section 4 Applicability Conditions that, "Any module referencing strata i shall be used in combination with this module". Is seems that stratification is a generic process that can apply to all activities that would be covered by VM0007.
Response from Methodology Developer 11 November 2013	This was inserted in the title because ARR has its stratification procedures from AR-ACM0003.
ESI Findings - Round 2 13 December 2013	The Summary and Applicability Conditions provide clarity. Finding closed.

Item Number	127
General Technical Expert Comments	
Evidence Used to Assess	Section 1 - Sources
ESI Findings - Round 1 03 October 2013	This revised module states, “For peat depth stratification, this module uses the proposed VCS Methodology - VCS Methodology Rewetting of Drained Tropical Peat lands in Southeast Asia”
Round 1 NCR /CL / OFI 03 October 2013	NCR - this revised module should not use a proposed VCS methodology as a source.
Response from Methodology Developer 11 November 2013	We removed this statement altogether.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	128
General Technical Expert Comments	
Evidence Used to Assess	Section 3 - Definitions
ESI Findings - Round 1 03 October 2013	Nothing was found in the definitions section.
Round 1 NCR /CL / OFI 03 October 2013	CL - include a statement that is similar to the other revised modules.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	129
General Technical Expert Comments	
Evidence Used to Assess	Section 4 - Applicability
ESI Findings - Round 1 03 October 2013	The revised module states, "In case of REDD, above ground biomass strata are only used for pre-deforestation forest classes, and are the same in baseline and actual cases. Post-deforestation (conversion) land-uses are not stratified, instead using average post-deforestation stock values (e.g. “Simple Conservative” or “Historical Area-weighted” approaches per Module BL-UP)". Part 4 of module BL-UP uses different terminology, e.g. forest strata, not forest classes, and non-forest land use, not conversion. It is unclear of the meaning of actual case.

Round 1 NCR /CL / OFI 03 October 2013	NCR - this section of the revised module is wordy and difficult to understand. It uses terminology that is different than the referenced module BL-UP. Please rewrite.
Response from Methodology Developer 11 November 2013	Rephrased. Note that BL-UP uses the term forest class and there it has the same meaning as in X-STR. Forest classes can be stratified into different biomass stocks.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	130
General Technical Expert Comments	
Evidence Used to Assess	Section 4 - Applicability
ESI Findings - Round 1 03 October 2013	For all WRC project activities on peat land that cannot demonstrate that the expected emissions from the soil organic carbon pool or change in the soil organic carbon pool in the project scenario is below de minimis this module shall be used to delineate non-peat versus peat and to stratify the peat according to peat depth and soil emission characteristics.
Round 1 NCR /CL / OFI 03 October 2013	NCR - this section of the revised module is wordy and very difficult to understand. Please rewrite.
Response from Methodology Developer 11 November 2013	Rephrased
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	131
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures
ESI Findings - Round 1 03 October 2013	The modules states, "Strata must be discernible taking into account good practice in terms of the accuracy requirements for the definition of strata limits / boundaries. This shall be indicated in the PD and the choice shall be justified".
Round 1 NCR /CL / OFI 03 October 2013	NCR - this section of the revised module is wordy and very difficult to understand. Please rewrite or remove this statement.
Response from Methodology Developer 11 November 2013	Removed
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	132
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures
ESI Findings - Round 1 03 October 2013	The revised module states, "The project area may be stratified ex ante, and this stratification may be revised ex post for monitoring purposes. Established strata may be merged if reasons for their establishment have disappeared or have proven irrelevant to key variables for estimating net GHG emissions or removals".
Round 1 NCR /CL / OFI 03 October 2013	NCR - stratification must be maintained for the 10-year period used to establish the baseline. Changing it for the purposes of monitoring cannot be done because it will change the baseline and reported emission reductions and removals. Remove this statement.
Response from Methodology Developer 11 November 2013	We do not agree with the NCR. The baseline will maintain its stratification for 10 years but in the with-project scenario situations may change warranting a new stratification. For example, an area may be planted with trees after 3 years - this will become a new stratum.
ESI Findings - Round 2 13 December 2013	The validator agrees with the with-project example given, so long as the baseline stratification will be maintained for 10 years. Finding closed.

Item Number	133
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Section 1
ESI Findings - Round 1 03 October 2013	The revised module states, "When using remote sensing, data must be georeferenced into a common geodetic system, for example using the UTM system and the geometric accuracy of the image data shall be indicated". This requirement is not consistent with the requirement in the previous paragraph that states, "The areas of strata delineated prior to allocation of inventory plots using stratified sampling are known exactly and require no accuracy assessment".
Round 1 NCR /CL / OFI 03 October 2013	NCR - ensure that the revised module is consistent with all requirements in the current and approved X-STR module.
Response from Methodology Developer 11 November 2013	We see an issue with the term 'exactly' in the current version of the module. It is apparently assumed that common method to obtain areas of strata are sufficiently accurate so as to deem the result 'exact'. We can make a similar assumption for the remote sensing method and , therefore, remove the phrase about accuracy and replace it with "using best-practice methods in remote sensing".
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	134
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Sections 2,3,4

ESI Findings - Round 1 03 October 2013	Sections 3 and 4 are subsections of Section 2
Round 1 NCR /CL / OFI 03 October 2013	OFI - consider including Section 3 and 4 as subsections to Section 2.
Response from Methodology Developer 11 November 2013	We do not think that this is a better structure since it are not per se sub-issues.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	135
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Section 4 footnote. Section 6 - Data and Parameters.
ESI Findings - Round 1 03 October 2013	The Section 5 footnote states, "the drained baseline situation peat subsidence typically amounts to up to 5 cm y-1; the 50 cm accuracy criterion thus relates to the minimum monitoring interval of 10 y; in the with-project scenario subsidence rates will be considerably lower (ideally 0 cm) and the 50 cm accuracy criterion will amount to <5% error on the 100 y permanence criterion". Section 6-Data and Parameters uses the term m yr-1, which is not consistent.
Round 1 NCR /CL / OFI 03 October 2013	CL - spell out y and yr as year.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	136
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Section 4
ESI Findings - Round 1 03 October 2013	Equations 1 - 10 include many variables that are not defined directly under each equation, making it difficult to follow. Equations 11 and 12 do not define any variables.
Round 1 NCR /CL / OFI 03 October 2013	CL - define equation variables under each equation
Response from Methodology Developer 11 November 2013	Done

ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	137
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Section 5
ESI Findings - Round 1 03 October 2013	Under the applicability condition of this methodology, the project boundary shall be designed such that the negative effect of drainage activities that occur outside the project area on the project GHG benefits are minimized (e.g. enhanced drainage, groundwater extraction, and changing water supply). This can be achieved either by an appropriate design (e.g. by establishing an impermeable dam) or by a buffer zone within the project boundary. This buffer zone, if employed, shall be mapped. The buffer zone shall be determined on the basis of quantitative hydrological modeling, literature references or expert judgment.
Round 1 NCR /CL / OFI 03 October 2013	NCR - the validator did not see this statement made in the applicability section of the revised module. Ensure that this statement is consistent with the requirements in the applicability section. This section of the revised module is wordy and very difficult to understand. Please rewrite.
Response from Methodology Developer 11 November 2013	Rewritten + added sentence in applicability section (4) 'the project boundary shall be designed such that the negative effect of drainage activities that occur outside the project area on the project GHG benefits are minimized'.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	138
General Technical Expert Comments	
Evidence Used to Assess	Section 5 - Procedures, Section 5
ESI Findings - Round 1 03 October 2013	Procedures for buffer zones against ecological leakage are provided in Module LK-ECO.
Round 1 NCR /CL / OFI 03 October 2013	CL - the validator does not understand the way "against" is being used. Please rewrite.
Response from Methodology Developer 11 November 2013	We replaced 'against' with 'to avoid'.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	139
General Technical Expert Comments	
Evidence Used to Assess	Section 6 - Data and Parameters
ESI Findings - Round 1 03 October 2013	The equations where variables are used were not found.
Round 1 NCR /CL / OFI 03 October 2013	NCR - ensure that a reference is included for the equation where the variable is used.
Response from Methodology Developer 11 November 2013	Done. In each variable table reference is made to the equations that use this variable
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	140
General Technical Expert Comments	
Evidence Used to Assess	Section 3- Definitions and Acronyms
ESI Findings - Round 1 03 October 2013	The acronym RRD is used as "Reference region for projecting rate of deforestation". RRD is references as Reference Region for Deforestation in REDD+MF, but not defined. The validator did find the use of the term "Reference region for projecting rate of deforestation" in module BL-UP VMD0007. But this module is not included in the scope of this validation.
Round 1 NCR /CL / OFI 03 October 2013	CL - ensure that "Reference Region for Deforestation" is defined and used consistently throughout VM0007 and all required modules. See CL under REDD+MF.
Response from Methodology Developer 11 November 2013	See there
ESI Findings - Round 2 13 December 2013	This was a requested clarification on line 73 that was accepted. Finding closed.

Item Number	141
General Technical Expert Comments	
Evidence Used to Assess	Sections 2, 5 and 6 of the module

ESI Findings - Round 1 03 October 2013	Section 2 and Section 5 of the BL-ARR module discuss baseline net GHG removals. Typically, in ARR projects on mineral soils, removals in the baseline is zero. ARR projects on peat may include emission reductions in the baseline. It seems that the description of ΔCBSL-ARR would need to include reductions and removals. I have raised this to an NCR due to the systemic nature of this finding in the updated and new modules.
Round 1 NCR /CL / OFI 03 October 2013	NCR - ensure that the definition of ΔCBSL-ARR and how it is defined with either ARR projects on mineral soil and peat soil is consistent and clear.
Response from Methodology Developer 11 November 2013	We do not understand this NCR. The statement 'Typically, in ARR projects on mineral soils, removals in the baseline is zero.' is not correct. An ARR baseline may pertain to a sink - the project then just enhances it. Furthermore, there are no emission reductions in a baseline - a baseline has either net emissions or net removals. The description of the parameter refers to a net removal (removals greater than emissions), which is exactly what ARR is supposed to encompass.
ESI Findings - Round 2 13 December 2013	This NCR is withdrawn. In re-reading this part of the module and how it refers to the CDM methodology for mineral soil, and how the module developer has responded, the validator is now not sure why this NCR was issued. Finding closed.

Item Number	142
General Technical Expert Comments	
Evidence Used to Assess	Section 5 of the module
ESI Findings - Round 1 03 October 2013	Section 5 shows formula's 1 and 2 without providing a description of the variables used.
Round 1 NCR /CL / OFI 03 October 2013	NCR- ensure that all variables are described.
Response from Methodology Developer 11 November 2013	Done
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	143
General Technical Expert Comments	
Evidence Used to Assess	Section 5 of the module
ESI Findings - Round 1 03 October 2013	Section 5 shows formula's 1 and 2 without providing a description of the variables used.
Round 1 NCR /CL / OFI 03 October 2013	NCR- ensure that all variables are described.

Response from Methodology Developer 11 November 2013	Checked. The variables are now all described underneath the equation. The parameters that come from other modules, or from literature etc., are described in more detail in the parameter list in section 6. Variables that are calculated in this module from other variables are not described in section 6.
ESI Findings - Round 2 13 December 2013	Accepted. Finding closed.

Item Number	144
General Technical Expert Comments	
Evidence Used to Assess	REDD-MF
ESI Findings - Round 1 03 October 2013	In the REDD-MF it's already stated that "ARR activities shall not enhance peat oxidation and therefore this activity requires at least some degree of rewetting"; however, it is necessary to double check that procedures work out to capture the relationship of GHG emissions and water table depths in this case, which different to when there's only open (domed) peatlands or peatlands exhibiting initial stages of forest recovery (where ARR can be implemented to enhance carbon sequestration). Thus, in general, methods contained in the methodology must ensure that ARR or REDD activities on peat will not lead to a lowering of the water table, and methodologies need to establish the appropriate change in water table depth.
Round 1 NCR /CL / OFI 03 October 2013	
Response from Methodology Developer 11 November 2013	
ESI Findings - Round 2 13 December 2013	NCR: In the REDD-MF it's already stated that "ARR activities shall not enhance peat oxidation and therefore this activity requires at least some degree of rewetting"; however, the procedures to capture the relationship of GHG emissions and water table depths in this case are not clear. Please explain how the modules present a methodology that ensures ARR or REDD activities on peat will not lead to a lowering of the water table.
Round 2 NCR /CL / OFI 13 December 2013	Section 5.6 of M-PEAT begins with "Projects in which drainage continues or is maintained are not eligible. Accidents (e.g. breaching of a dam) or unplanned drainage activities shall be reversed and remediation must be monitored together with justifications that the effect has been temporal and insignificant." To make sure that the water table is monitored as evidence that the project meets the applicability conditions the following sentence is added: "The methodology developer must provide evidence that the applicability conditions of the methodology regarding the water table depth are met by monitoring the water table depth, for which procedures are provided below."
Response from Methodology Developer 20 February 2014	Added to Section 5.6: 'The methodology developer must provide evidence that the applicability conditions of the methodology regarding the water table depth are met by monitoring the water table depth, for which procedures are provided below'.

Final ESI Findings 11 March 2014	The response provide combined with the clarifying text added to M-PEAT appear to sufficiently meet the VCS requirements regarding monitoring and reporting water table depth and any impact on water table resulting from ARR activities. The response clearly shows that the project will not meet the applicability criteria if the water table is lowered, and that the monitoring requirements are sufficient to capture any lowering of the water table. Finding closed.

Appendix C – Evidence of VVB Eligibility

Name of Project	Validation Report – Date Issued	Date Project Registered	GHG Program Registered With
Kariba REDD+ Project	29 September 2012	15 October 2012	VCS
Lower Mississippi Valley Grouped Afforestation Project	11 October 2012	12 November 2012	VCS
Restoration of degraded areas and reforestation in Cáceres and Cravo Norte, Colombia	24 February 2011	14 March 2011	VCS
TIST Program in Kenya VCS-001	2 March 2011	15 April 2011	VCS
TIST Program in Kenya VCS-002	2 March 2011	15 April 2011	VCS
TIST Program in Kenya VCS-003	2 March 2011	15 April 2011	VCS
TIST Program in Kenya VCS-004	2 March 2011	17 April 2011	VCS
TIST Program in Kenya VCS-005	16 December 2011	22 December 2011	VCS
Bull Run Overseas Forest Carbon Project: Phase 1	15 March 2012	13 April 2012	VCS
Redd Forests Grouped Project: Protection of Tasmanian Forest	13 December 2012	pending	VCS
TIST Program in Uganda VCS-001	20 March 2012	25 May 2012	VCS
TIST Program in Uganda VCS-002	20 March 2012	25 May 2012	VCS
TIST Program in Uganda VCS-003	20 March 2012	25 May 2012	VCS
TIST Program in Uganda VCS-004	20 March 2012	25 May 2012	VCS
Protection of the Bolivian Amazon Forest	26 March 2012	25 May 2013	VCS
Reforestation of Degraded Lands in the Valle California of Patagonia, Chile	18 June 2012	29 August 2012	VCS
April Salumei Sustainable Forest Management Project	08 October 2013	complete	VCS
TIST Program in Kenya – VCS-006	27 September 2012	01 October 2012	VCS
TIST Program in Uganda – VCS-005	7 March 2013	13 March 2013	VCS
TIST Program in Uganda – VCS-006	7 March 2013	13 March 2013	VCS

TIST Program in India VCS-001	7 March 2013	13 March 2013	VCS
Avoiding Planned Deforestation and Degradation in the Valdivian Coastal Reserve, Chile	12 November 2013	complete	VCS
TIST Program in Kenya – VCS-009	7 March 2013	13 March 2013	VCS
Reforesting Degraded Lands in Chile Through the use of Mycorrhizal Inoculation	23 April 2013	02 May 2013	VCS
Tasmanian Land Conservancy–New Leaf Project	29 October 2013	complete	VCS/CCB