

SUMMARY OF PUBLIC CONSULTATION

VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation, v1.1

A draft of the module VMD0055 Estimation of Emission Reductions from Avoiding Unplanned Deforestation, v1.1, was open for public consultation between August 9th, 2024, and September 9th, 2024. This document includes a list of all comments received and the developer's response.

KEY QUESTIONS

Q1: Are there any potential risks to including sustainable forest management activities within REDD projects? If so, are there any additional suggested safeguards?

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#	Organization	Comment	Developer's Response
1	Atmosphere Alternative	Sustainable forest management activities must be carried out in accordance with national and local regulations, so that the harvesting of trees does not exceed the optimum quantities, which could generate some type of environmental risk; additionally, the social and environmental safeguards already in place will comply with the duty to safeguard these aspects, so no additional safeguards would be required, as long as they are duly verified by control agencies.	Noted

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#	Organization	Comment	Developer's Response
2	Carbonext	No, there are no potential risk, as long as the management operation is of low impact.	Noted
3	Conservation International	<p>Yes, there are several risks associated with adding sustainable forest management, 3 examples bellow:</p> <ul style="list-style-type: none"> - It risks undermining additionality, potentially allowing timber companies to continue business as usual while gaining carbon revenues alongside wood product revenues without substantial changes in management. - Safeguarding against this would require strict financial additionality requirements (which are often easy to manipulate) and robust data on harvest volumes (which is challenging to gather in most developing countries). - Risk of displacement of logging activities to other intact forest patches outside project area. This may happen, when forest in project areas where carbon stock does not meet the requirement on “at least 20 percent lower than the average stock of the corresponding undegraded forest...”. For example, if the market needs timber and national policies allow, loggers may just go somewhere else to find wood demanded by the market . <p>Some logging companies may not pursue reaching Programmed for the Endorsement of Forest Certification or the Forest Stewardship Council standards. It will be too</p>	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Q1: Are there any potential risks to including sustainable forest management activities within REDD projects? If so, are there any additional suggested safeguards?

#	Organization	Comment	Developer's Response
4	Terra Global Capital	<p>costly. In such cases VCS standard and national regulation should be enough.</p> <p>Yes there are. Allowing harvesting activities within the project boundary could potentially lead to deforestation since there is no limit to how much degradation can this activity lead to the forest. In other words, it is possible to degrade the forest if well planned and if it does not change the forest status to other land use. It should not be that way. The risk with no doubt is this: The REDD+ Project ends up protecting the no conversion of Forest to non-forest lands but not guaranteeing a healthy ecosystem due to poor performance of tree harvesting procedures that finally affect not only the carbon stock but most importantly ecological and biodiversity traits of the forest. The worst and most likely scenario is where this process takes place in a generalized way across the whole forest area, devouring the biggest and most precious trees, even when it can be avoided surpassing the threshold canopy cover to keep it recognized as a forest land.</p> <p>Additional safeguards: 1. Determined a threshold of how much the harvesting of tree activity is able to keep degrading the already degraded forest. 2. Limit the sustainable timber extraction activities to not exceed X% of the project</p>	<p>Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out</p>

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#	Organization	Comment	Developer's Response
		<p>area, explicitly excluding endangered species, establishing minimum cutting DBH and ensuring that ecological functions are kept intact, and natural / biodiversity corridors are not impacted. In other words, it will require a much more robust assessment of these ecological forest traits. It shouldn't be left to the fate of what is mentioned in the numeral 4.3.b "...competent local or national regulatory body or by internationally recognized schemes such as the Program for the Endorsement of Forest Certification or the Forest Stewardship Council". I'm unsure if those schemes are optimized for Natural Forest Conservation and can guarantee the safety and wellness of a natural forest ecosystem.</p> <p>3. Provisions regarding replanting and maintaining the replanted areas should be included to ensure no biodiversity loss.</p>	

Q2: Do the conditions under which forest management activities are allowed in the project scenario provide both sufficient safeguards to preserve forests' integrity, and adequate opportunity for supporting the projects' sustainability?

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#	Organization	Comment	Developer's Response
5	Atmosphere Alternative	Yes, the integrity of the forests is obtained with the optimal use of their products (in this case the forest management activities contemplated), therefore, this must be accompanied by controls and indications that regulate the amount of wood, fiber or fuel production that is intended to be harvested.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
6	Ambipar Environment	Applicability: the scientific premises considered to define that "forest management activities ensure the preservation of forest integrity only when they are carried out in degraded areas with carbon stock at least 20% lower than the stock in non-degraded" areas are not clear. The module does not specify how the project should categorize the forest as degraded or non-degraded (it is unclear which practical aspects should be considered to demonstrate/materialize that the forest is degraded and that its carbon stock has been reduced by anthropogenic activities). Based on the points mentioned, it is understood that these requirements do not qualify as effective safeguards and hinder the implementation of sustainable forest management activities in REDD AUD projects. This understanding takes into	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

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		<p>account the practical limitations in precisely defining what constitutes degraded areas. Definitions of this term in the literature are quite diverse. In the Amazon, a degraded area is considered one that has suffered disturbances due to anthropogenic impact and has no natural regeneration capacity, thus having very limited viability for implementing planned harvesting activities. Additionally, the complexity in defining strata that account for the differences in carbon stock between areas classified as degraded and non-degraded must be considered. It is also important to emphasize that in the Amazon, selective logging (Sustainable Forest Management) is practiced, a method that becomes unfeasible in degraded forests. These methods are approved by Brazilian legislation and are aligned with the principles of international certifications such as FSC. Sustainable forest management has its own safeguard principles that do not restrict the activity to the prior degradation of the area.</p> <p>Suggestion: the safeguards defined as applicability requirements could align with and be consistent with the best practices outlined in international frameworks such as the Forest Stewardship Council, explicitly detailing conditions, limitations, and rules that truly function as safeguards with technical and scientific support.</p>	

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7	Carbonext	<p>"The item "3a" deeply concerns us as project developers. Therefore, we would like to suggest an update on the safeguards regarding Sustainable Forest Management (SFM).</p> <p>We understand that SFM should be allowed to undegraded forest, since:</p> <p>i) it is less sustainable to carry out SFM in a degraded forest. Such areas, when protected, are in a regenerative process. Carrying out SFM on degraded forests would only worsen degradation, once it will affect the regeneration and can even cause a collapse in local biodiversity;</p> <p>ii) SFM operations are aimed to maintain forest sustainability. Item 3b), that states that SFM should be either certified by a competent local or national regulatory body, or by an international recognized program (FSC) already guarantees that the activity will be developed in a way to maintain the ecological functions and the integrity of the forest (fauna and flora);</p> <p>iii) The requirement to implement SFM in already degraded areas is not mandated by either the FSC or competent authorities (at least not by Brazilian authorities—Brazil accounts for 57% of the VM0015 registered projects in Verra, and 43% of issued VCUs under this methodology). Therefore, the methodology should not demand such practice. Adding such a requirement will affect numerous existing projects and</p>	<p>Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out</p>

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		<p>prevent new projects from being developed, which, in turn, will impact forest protection and greenhouse gas (GHG) emission reduction;</p> <p>iv) It is less likely that the SFM carried out in a degraded forest can indeed support the project sustainability and permanence, once the owners of the landowners are often seeking a more stable source of revenue and it is known that the voluntary carbon market is more unsteady than the SFM market;</p> <p>v) Usually, forests with carbon stock at least 20% lower than the average carbon stock of a corresponding undegraded forest have already gone through a SFM (i.e., the commercial timber trees have already been harvested, and any further harvest would not be done in a sustainable manner). Or even, they have suffered from fire degradation or disease, which can make it unfeasible to carry out a SFM.</p> <p>Hence, we are of the view that this criterion (3 a) should be removed. "</p>	
8	Conservation International	No, it is difficult to collect and verify accurate harvest data, and financial additionality is vulnerable to manipulation.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
9	Terra Global Capital	<p>Not, it doesn't. Plus the abovementioned safeguards, please consider the following aspects as well.</p> <p>1. It would be advisable to list acceptable logging types that have been recognized as having minimum impact on the health of the</p>	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

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		<p>ecosystem. So, it is demonstrated that the Standard has previously pondered both successful and failed natural forest logging case projects.</p> <p>2. There are gaps in the approach. It is indicated that sustainable timber extraction can be included as a REDD project activity as long as the conditions of degradation of the forest meet certain requirements. However, the methodology and the reference module are only focused on Unplanned Deforestation but it is still not addressing Unplanned Degradation. The so-called project tree harvesting activities are then a way of planning forest degradation. This leaves space for questions such as How would this fact converse with a future module on Unplanned Degradation? There is a lack of guidance on how is the standard expecting a project developer to measure forest unplanned degradation in order to define whether or not the condition for forest degradation apply in order to continue allowing this process but in a planned way. Solutions At least the standard should encourage following active meths procedures to measure this component (e.g. VM0006)</p>	

Q3: Is the proposed procedure for emissions accounting from forest management activities in the project scenario sufficiently accurate and operational? Are there any improvements that can be made?

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#	Organization	Comment	Developer's Response
10	Atmosphere Alternative	Improvements can be made in that the process can be more specific and differentiated according to the activity to be carried out, since some can create greater impacts than others.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
11	Ambipar Environment	<p>Emission Estimate: It is not clear whether the project can account for emissions caused by planned harvesting in the baseline scenario, especially considering that the equations presented in the market leakage module include the accounting of emissions from forest harvesting in the baseline scenario. Modules VMD0055 and LK-ME are not fully aligned</p> <p>Emissions From Fossil Fuel Combustion: the module VMD0055 does not make it clear that the accounting of emissions from fuel combustion is optional (as determined in Table 1 of VM0048). We emphasize that the quantification of this emission source should remain optional, considering potential operational limitations in recording and monitoring accurate fuel consumption data, or should be reported only when significant relative to the total emissions of the project operation</p>	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Q3: Is the proposed procedure for emissions accounting from forest management activities in the project scenario sufficiently accurate and operational? Are there any improvements that can be made?

#	Organization	Comment	Developer's Response
12	Carbonext	As improvement, we have a suggestion regarding the inclusion of "Emissions From Fossil Fuel Combustion" in relation to SFM activities (page 50). It is requested to include a provision on the significance in order to decide whether it is necessary to account for this source of emission.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
13	Carbonext	We have a question regarding the use of the equations on pages 45 to 53: if we are using these equations, does it mean that we no longer need to conduct a local inventory after degradation caused by the SFM, and in this case, would we use the biomass discounted by the equations?	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
14	Conservation International	No, we don't think it's operational for development projects. The only organizations capable of providing the necessary data would likely be timber companies, and they may not meet the additionality criteria.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
15	Terra Global Capital	For this subsection (Emissions From Fuelwood Collection and Wood Extraction for Charcoal and Fiber Production) of section 5.3.3.5 about fuelwood collection and wood extraction for charcoal and fiber production, the word: "responsible collection" should have a particular interpretation/definition. This information might not be operational to track record as planned collection, over big areas with several communities and persons doing that.	Sustainable forest management issues such as timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Q4: Can the data required by the procedure for emissions accounting from forest management activities (i.e., selective logging and/or wood extraction for fuelwood, charcoal, or fiber) in the project scenario be routinely and accurately recorded?

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#	Organization	Comment	Developer's Response
16	Atmosphere Alternative	It is difficult to carry out an accurate process because in the case of activities such as fiber production, firewood production and others, the values obtained are not very significant and it is difficult to detect them through fragmentation analysis.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
17	Ambipar Environment	Variables such as the volume of wood lost and not extracted (VnotEX, INF) can be difficult to measure in the field, potentially impacting the operational costs of forest management activities. We suggest the possibility of using secondary data (literature) to estimate this parameter.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
18	Carbonext	"As suggestion of improvement, we bring the following points: i) Page 47: The text of the module indicates that the value for the parameter "Vex,inf,j,i,t" must be obtained from field data. However, we believe it is important to allow the use of conservative data from the literature, since this data is not always available at the moment the PD is developed, and even for the period of the MR, it is often difficult to	Sustainable forest management issues such as timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Q4: Can the data required by the procedure for emissions accounting from forest management activities (i.e., selective logging and/or wood extraction for fuelwood, charcoal, or fiber) in the project scenario be routinely and accurately recorded?

#	Organization	Comment	Developer's Response
		<p>obtain field data.</p> <p>ii) Page 47: The parameter "VnotEX,INF,k,i,t" was not included in the "parameters" section. We request its inclusion with permission to use conservative data from the literature.</p> <p>iii) Page 49: The parameter "FRSD" was not included in the "parameters" section. We request its inclusion with permission to use conservative data from the literature.</p> <p>iv) Page 47: The parameter "CFj" was not included in the "parameters" section. We request its inclusion with permission to use conservative data from the literature."</p>	
19	Conservation International	No, obtaining accurate data is a significant challenge. Even in compliance markets like California's ARB, data quality is hard to ensure, and this problem is magnified in remote areas. For context, even tracking cattle herd numbers in pastoral communities is difficult.	Sustainable forest management issues such as timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
20	Terra Global Capital	Yes, all this data should be gather as part of the management program that ultimately monitors the volume extracted and species used.	Noted

GENERAL FEEDBACK

Section 1 - Sources

Section 1 - Sources			
#	Organization	Comment	Developer's Response
21	Atmosphere Alternative	Alignment of this module with the previous module VT0007 Unplanned Deforestation Allocation (UDef-A) is ensured.	Noted

Section 3 - Definitions

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#	Organization	Comment	Developer's Response
22	Atmosphere Alternative	Definitions concerning sustainable forest management can be included because this topic is included in the updates.	Sustainable forest management including timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
23	Carbonext	Minor proposal of change In regard the following definition "Geographically constrained deforestation and degradation agents: Agents that have generated their livelihood inside or near the	Agreed; adverb removed

Section 3 - Definitions			
#	Organization	Comment	Developer's Response
		UDef PA since the start of the project", we would like to suggest to remove the sentence 'since the start of the project', once it is not aligned with the definition presented on section 5.3.4.3.	

Section 4 - Applicability Conditions

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#	Organization	Comment	Developer's Response
24	Future Climate Group	<p>What is the rationale behind the requirement in section 4 Applicability Conditions (VMD0055), item '3) Where project activities include harvesting trees for wood products:</p> <p>(a) Such activities only occur in degraded forests with carbon stock at least 20 percent lower than the average stock of the corresponding undegraded forest and whose stock has been historically (at least over the last ten years) reduced by anthropogenic activity including timber or fuelwood harvest, fire, or disease.)</p> <p>, which limits harvesting activities to degraded forests with carbon stocks at least 20% lower than those of non-degraded forests? Considering that sustainable forest</p>	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Section 4 - Applicability Conditions

#	Organization	Comment	Developer's Response
		management in Brazil, especially in the Amazon, predominantly occurs in non-degraded forests, this requirement becomes practically unfeasible. Sustainable management in the Amazon is crucial for biodiversity conservation and climate change mitigation. Therefore, how can this criterion be adapted or interpreted to align with the sustainable management practices already implemented in Brazil, ensuring that it does not hinder projects that promote the conservation and responsible use of forest resources?	
25	Carbonext	We suggest the exclusion of item 3a, as mentioned in tab 'Key Questions'.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
26	Carbonext	If decided to maintain item 3a, include the possibility of conducting SFM activity in both degraded and non-degraded areas.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out

Section 5 - Project Boundary

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#	Organization	Comment	Developer's Response
27	Carbonext	The concept of Leakage Management Zone (consistent with the VCS Standard definition) indicates that the LMZ "... are areas under the control of the project...". However, we understand that the LMZ will not always be under the control of the project, especially when it refers to an area of a community beneficiary of the project activities, or even another VCS project. We suggest updating this definition, taking into account the rationale presented.	The selection of a leakage management zone should be under the control of the project proponent to enable carrying out leakage mitigation measures. The fact of implementing activities with communities as beneficiaries do not negate the control of PP. For instance, if a PP implements mitigation measures for enhanced cropping or ranching for grassland management with benefits to the communities whose yield will be improved and/or cattle having access to fodder, that does not take away the control of the LMZ from the PP. In instances where another VCS project implemented by the same PP or another PP straddles/overlaps the boundaries of the LMZ, that is where the module suggests that, that portion's (OVERLAP) emissions are omitted from the estimation. This does not connote the control or otherwise of that area.
28	Carbonext	The suggested change concerns the concept of "project activities region", particularly regarding the phrase that states this area also includes "...surrounding deforested areas extending 10 km from the UDef PA...". We believe that the 10 km distance limit may be inconsistent with the realities of the Amazonian territorial dynamics. In other words, by restricting the definition of the "project activities region" to 10 km, we risk excluding important communities that play a role in the deforestation dynamics of the PA. Therefore, we request greater flexibility regarding this value, allowing for adjustments depending on the project scenario.	We appreciate the feedback in considering flexibility for surrounding deforested areas extent above the proposed 10 km distance limit. However, considering there could be more or less important communities playing a role in the deforestation dynamics pertaining to any specific project, it is important to set a threshold that is inclusive and covers enough area and the deforestation dynamics. This is also done with the Amazonian territory in mind with the possibility of other VCS projects in adjoining landscapes as well as monitoring capacities and resources of project proponent. Standardization of certain parameters is key in ensuring consistency and transparency within the methodology and reporting by various projects. Nevertheless, the specific value of this threshold might be revisited in future revisions of this module

Section 5 - Project Boundary			
#	Organization	Comment	Developer's Response
29	Conservation International	Section 5.3.2.2 It is suggested document specify how the baseline annual area of unplanned deforestation will be distributed to project proponent or reference to the document where it is detailed. Previous version mentioned it would be posted on the project's page in Verra Registry. Is it still the same way?	This information does not belong to the VMD055, but it will be provided through the relevant pages of Verra's website.
30	Conservation International	Section 5.3.3.1 There is a mistake in the numeration of "Estimation of Project Emissions through Forest Degradation in the UDef PA" section. It is 1,2 ,4,5,a	Addressed
31	Terra Global Capital	Having to rely on projected baseline Udef PA and Udef LB provided by VERRA requires relying on VERRA benchmark model for risk assessment, which could only relies on distance from forest boundaries. This is problematic because the benchmark model is often oversimplifying and invalidate the possibility to run the alternative model, theoretically allowed in VT0007 Section 5.5.3	This is a misunderstanding of the VT007 procedure. The benchmark model is just...the benchmark. The final deforestation risk model would have better predictive capacity than the benchmark model and will include other relevant variables.
32	Terra Global Capital	Section 5.3.1 does not include provisions for transitioning from a JNR FREL baseline that uses a different methodology to VM0048 and VMD0055.	While this is true, to date no JNR programs are in place.

Section 6 - Baseline Scenario

Section 6 - Baseline Scenario			
#	Organization	Comment	Developer's Response
33	Future Climate Group	In the context of assessing the impact of sustainable forest management practices, could you provide a comprehensive explanation of how these practices are integrated into the baseline calculations? Specifically, is the practice of sustainable management accounted for within the Activity Data metrics? If so, please elaborate on the rationale behind this inclusion. How does it influence the overall assessment of carbon stock changes, and what methodologies are employed to ensure that these practices are accurately reflected in the data?	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
34	Atmosphere Alternative	The criteria for the creation of the forest stratification map are understandable and the tool for calculating the Udef PA and Udef LB is clarified.	Noted
35	Carbonext	Regarding emissions derived from project activities, it is requested to include a provision for the possibility of assessing the significance and determining whether it is necessary to account for these emissions.	Such provision is already in place. Please, look at section 5.3 and Appendix 1 of VM048.
36	Carbonext	Inclusion of “any emission” related to project activities We request the inclusion of the provision on significance in order to decide whether it is necessary to account for.	Such provision is already in place. Please, look at section 5.3 and Appendix 1 of VM048.

Section 8.2 - Project Emissions

Section 8.2 - Project Emissions			
#	Organization	Comment	Developer's Response
37	Carbonext	Minor proposal of change Please check formatting (item 4 appears twice)	Addressed

Section 8.3 - Leakage

Section 8.3 - Leakage			
#	Organization	Comment	Developer's Response
38	Ambipar Environment	The required sampling (200 households or 80% of the estimated number of households if the total is less than 250) for calculating the PROPMig variable is arbitrary and quite challenging, especially considering intrinsic difficulties in certain regions, such as the Brazilian Amazon, which has vast territorial extent, logistical constraints, and social issues, including potential risks and conflicts that may arise when dealing directly with potential deforestation agents. These challenges can hinder and potentially make it unfeasible to achieve a significant number of samples during the planning and design phase of a REDD AUD project. As a	AGREED AND ADJUSTMENTS MADE. These provisions take it root from the CDM guidelines on Sampling and surveys for CDM project activities and programmes of activities based on robust scientific calculations of estimating representative sample numbers for a population. This minimum number provided is to allow for understanding the dynamics of the proportions of the migrated land cover transition agents in the baseline. In as much as we appreciate the issues of logistical constraints, it is prudent to carry out inclusive and broad stakeholder consultation process in understanding land use activities identified as a baseline driver of deforestation. We believe it is the planning and design phase of the REDD AUD project that stakeholder identification and consultation need to be broad and inclusive to avoid potential safeguards issues

Section 8.3 - Leakage			
#	Organization	Comment	Developer's Response
		suggestion, we recommend that the module, in the specified section, not establish a minimum number of households to be surveyed but rather propose guidelines aligned with the stakeholder consultation process already defined in other documents, such as the AFOLU Non-Permanence Risk Tool and the VCS Standard.	and conflicts in the ensuing stages of the project development process hence the quotation of a minimum threshold by the module based on scientific estimation of sample sizes as under the CDM. Nevertheless, instead of prescribing a fixed minimum sample size, we are now referring the user to determine it based on the best practices provided in the CDM document.
39	Ambipar Environment	<p>The module VMD0055 lacks details on how Market effects Leakage should be calculated. It does direct the reader to VMD0011, but the two modules do not seem to be completely aligned in the way these emissions are calculated, given that the latter was made for VM0007.</p> <p>Moreover, it is not clear in which cases market effects leakage should be calculated, especially if forest management activities in the project scenario are allowed only in degraded forests, as proposed. For example, will emissions from market effects leakage need to be calculated for the rest of the project area (intact forests for which deforestation is expected in the baseline scenario) in this case?</p>	As stated in section 2 of the VMD0055 under sources, this module relies on procedures described in VMD0011. This suggests a complete guidance on following the procedures in estimating Market leakage effect as appropriately described and detailed in the VMD0011. Though the VMD0055 has differences with estimations of emissions from the VM0007, the usefulness of the calculation of market effect leakage is still relevant in the dependent module VMD0011 and as such the reference to it from the current module VMD0055 instead of repeating all the requirements and details of how Market effects leakage should be calculated. The interlinkages and dependencies of methodologies and modules on previous versions reduces repetition and redundancies unless otherwise where the past method or module has been inactivated and there is new approach prescribed for doing a particular estimation. It is in such instances that the new module or methodologies provides details on how the estimates should be done. Nevertheless, Verra is in the process of developing an updated, more comprehensive tool to estimate market-effects leakage, which will provide additional, more comprehensive, and clearer guidance.
40	Carbonext	<p>Minor proposal of change</p> <p>The following sentence is missing the section</p>	Addressed

Section 8.3 - Leakage

#	Organization	Comment	Developer's Response
		number: "Monitored leakage emissions are described in Sections –."	

Section 9.3 - Description of the Monitoring Plan

Section 9.3 - Description of the Monitoring Plan

#	Organization	Comment	Developer's Response
41	Carbonext	Minor proposal of change Please check the formatting of the item "source of data" for the parameters: "Ass ; ADPA-Udef ; Buffer%"	Addressed
42	Carbonext	Minor proposal of change Please check the formatting of the item "source of data" regarding the parameters: "Cp,post,i ; CAB_nontree,post,i ; CAB_tree,post,i ; CBB_nontree,post,i ; CBB_tree,post,i ; CDW,post,i ; CLI,post,i ; CSOC,post,i" - in regard the sentence "Where these data are inadequate..."	Addressed

General Comments

General Comments			
#	Organization	Comment	Developer's Response
43	Conservation International	Given the general lack of reliable data on harvest volumes, mill capacity, and historical management plans, coupled with the issues surrounding financial additionality tests, it might be safer to avoid allowing harvesting in REDD+ projects. Otherwise, it could lead to lower-quality projects.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
44	Conservation International	Allowing harvesting in REDD+ could be counterintuitive at a project level due to harvesting is a degradation activity and REDD is "reduction emissions from deforestation and degradation". If harvesting activities occur within a project area, these activities should be focused on reducing emissions associated with logging/degradation activities, and it would be more suitable to develop this project under VM0035.	Timber harvesting activities in the project scenario will not be included in this version; further consultation and analysis is going to be carried out
45	Terra Global Capital	We are concerned about the fact that VERRA is de-facto gatekeeping modeling the activity data by forcing project proponents to use data developed internally by VERRA, with no chance to validate and/or improve jurisdictional level maps of activity and risk maps. This is problematic for a number of reasons: (1) it is not clear how transparent the data used would be, the methodology followed and the accuracy on the ground from field groundtruth held out data giving project	Verra is helping simplify the work of project proponents by taking on the role of developing the deforestation data. PPs have the opportunity to contribute to the process of developing jurisdictional level maps of activity and risk maps through submission of supplemental data such as ancillary spatial data, maps of potentially arable land, protection status etc. Verra has selected top scientists and institutions with the reputation of generating credible data based on robust methods and available latest scientific knowledge as Data Service Providers. Verra has also contracted independent institutions to conduct review of the work by the DSPs to enhance QA/QC and transparency.

General Comments			
#	Organization	Comment	Developer's Response
		<p>proponents no QA/QC assessment other than validating the FCBM data after its purchase;</p> <p>(2) it negates the use of ever-improving cutting edge technology to improve the quality of the data in near-real time. This is particularly true because the data provider is centralized, which in turn neutralizes any meaningful comparison with results and pipelines from anybody else than VERRA. Project proponents would also be de-incentivized to improve and submit their activity data because of the upfront cost they would face to get them, which would not decrease in any way the cost of getting the data from VERRA. This is a real concern, especially in light of how the wide literature in computer-vision and remote sensing stresses on the importance of decentralizing modeling efforts across sources to improve the quality and accuracy of algorithms and data products;</p> <p>(3) In the hypothetical situation in which the FCBM provided by VERRA is less accurate than the thresholds defined in page 111 section A1.4.3, project proponents would be highly disincentivized in developing a project regardless the potential for additionality. While we recognize that having a standard across projects is important, we believe it is equally important to allow for the optionality to test the quality of the activity data against VERRA's benchmark and being allowed to use whatever version provides the most</p>	<p>Verra allocates deforestation data to projects, based on local risk of deforestation to reduce potential conflict of interest and achieve consistent carbon accounting across the jurisdiction and improve on the integrity of VCUs by projects. This process also inherently reduces to cost to a single PP that would have gone through all the process of generating all the data required to meet the VM0048</p>

General Comments			
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		accurate results. A system like the model intercomparison shown in VT0007 Section 5.5.3 could suffice.	
46	Terra Global Capital	Appendix 4. From Table 18 in Appendix 4, it seems like even for government data, Verra through the Data Service Provider will conduct several processes for the different data product requirements. It is still not clear the rules when there is a JNR Baseline already develop for a Jurisdiction.	Under 'Review of AD Baseline Allocation Requests', provisions are made for this. In reviewing the allocation request, Verra will consider the following: Whether the project nests under a JNR Program: a. Where a project overlaps fully with a program area of a registered JNR program, the project must nest according to the jurisdictional program's nesting scenario and follow the provisions of the program to establish its baseline. Unless the nesting provisions explicitly rely on Verra to allocate AD baseline, the AD baseline will be directly allocated by the jurisdictional program.
47	Carbonext	Minor proposal of change Please check the formatting of item A3.4.1 (Content Section) In addition, we believe that it would be useful for the 'Content' section to contain more description of the subsections for better navigability in the module.	Addressed