

Comments received on Methodology for the Reduction of Enteric Methane Emissions from Ruminants through the Use of 100% Natural Feed Supplement

This comment was received via email by the VCS.

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1. Page 7, Footnote #1: Please provide full reference, this publication is not listed in Section 10 (References)
2. Page 7, Footnote #1: Please provide an explanation as to why such emission reductions cannot be quantified with this methodology. If peer-reviewed, empirical studies confirm such emission reductions, have derived reliable emission factors, and a project can reliably demonstrate the use of corresponding feeding practices per this methodology, should such emission reductions not be included?
3. Page 7, 2.c.: Please correct spelling to “as per” rather than “as pre”
4. Page 7, 2.d.: What is the justification for the 17% threshold?
5. Page 8, 5.a.: Please explain the choice of the recommended baseline period of “at least one year prior to project implementation”. A longer period may be chosen to determine business-as-usual practices if the farm was engaged in livestock production for a longer period. It should be demonstrated that operations over the baseline period are representative of expected future operations in the absence of the project and that baseline operations have not been significantly altered for the purpose of influencing baseline emissions.
6. Page 8, 5.b.:
 - The meaning of “stratum” and “situation” in this context should be clarified. It is unclear whether it is supposed to refer to typical livestock operations in the country or region in which the operation is to be established and if so, procedures should be outlined for the project to reliably demonstrate that the chosen “situation” serves as a conservative baseline.
 - If new livestock operations are to be established, it should be demonstrated by the farm that plans for establishing such operations have existed and would have been realized in the baseline scenario. Otherwise, it could be argued that new livestock operations may result in net emission increases relative to the prior land use activity.

7. Page 12, Table 4: Given possible revisions of the IPCC Guidelines, it may be preferable to reference the “latest version” of the IPCC Guidance to reduce the need for making continuous updates to the methodology document. It might be 2006 or a future iteration.
8. Page 14, ERF_{Enteric} Option 2: We assume that emission reductions from any improved feeding practice (e.g. provision of supplemental legume feed) could be accounted for using this method as long as baseline and project EFs can be reliably quantified and feeding practices demonstrated.
9. Page 15, Parameter GE_j:
 - Additional guidance should be provided regarding the data sources and the period over which an average should be derived. Examples of documentation may be given, including feed production or purchase records as well as record of feedstuff provision to animals.
 - Conservativeness of default value 18.45 MJ kg should be demonstrated.
10. Page 19, Parameter EF_{Productioni,j}:
 - Purpose of the data indicates calculation of the *baseline* scenario, however *project* emission procedures are described in “Justification of choice of data [...]” box. Please clarify.
 - “Justification of choice of data [...]” box further refers to a “sufficient number and sampling times” which requires further definition. Sufficient by which standard?
11. Page 22, Monitoring Plan: The same standard should hold for the determination of the baseline scenario, i.e. “project proponents must provide detailed feeding records for each farm”
12. Uncertainty does not seem to be addressed in the methodology. Procedures for calculating (and making deductions from ERs for) uncertainties should be provided.