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This comment was received via email by the VCS Association.

We would like to submit the following comments regarding the proposed new REDD methodology “Baseline and monitoring methodology for conservation projects that avoid planned land use conversion in peat swamp forests”, Version 5.1, December 2009.

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- It seems challenging to verify some of the applicability conditions. Please make sure all terms and procedures to verify applicability conditions are included in the applicability condition section. In case procedures are included further in the methodology, please refer to the relevant section in the methodology.
 - Condition C: It is assumed that the removal of biomass occurs through logging and/or burning. This assumption is not conservative. Some major palm oil companies are switching to a land preparation methodology that does not include fire. The biomass is put on piles and left to decompose. It is suggested to change the assumption to a condition that must be checked using a rigorous procedure.
 - Condition E: it must be specified which documentation is sufficient to demonstrate that the baseline conversion will be caused by corporate or governmental entities. In many areas, there is a hybrid threat of deforestation, in which land that is protected from conversion by corporate or governmental entities is still at risk by continuous degradation by communities. Unless the communities are actively targeted by project actions, biomass might be lost at higher rates than anticipated.
 - Condition F: how can one demonstrate what the net peat drainage depth would have been under baseline conditions? If it is common practice, please specify procedures to determine the common practice (duration of reference period, size of reference area, etc.)

- Condition I: how does one know that the biomass of vegetation is at steady state without having a time series of data? Please clarify whether carbon credits are generated from an increase in vegetation after the project start. If so, how is the baseline vegetation regeneration rate taken into account?
 - Condition J: how is the “local timber market” defined? By area? By historical reference?
- The methodology makes a number of assumptions for which the applicability may have to be checked
 - P 28: “in the baseline scenario, a plantation is established”. This seems to be an assumption that is not included in the baseline scenario.
 - P 30: “It is assumed that any biomass in the tree pool that is not harvested [...] is burned to clear the land”. This assumption is again not included as a condition in the baseline scenario. I have seen plantation companies who mulch old tree biomass and spread the mulch onto the soil, so that part of it may become soil organic matter.
- P 21: Three methods are provided to determine mean carbon stocks in aboveground tree biomass. It is expected that the three methods will vary widely in their accuracy according to how they are carried out. This is especially the case for the aerial imagery method, which may have been proven in principle, but is far from standard. There is a risk for potentially overestimating biomass. The “uncertainties and conservative approach” is inadequate in quantifying all of the uncertainty sources. For example, there is no uncertainty source related to the inherent variability within a forest stratum, and no uncertainty source related to the interpretation of aerial imagery. More specifically, the true accuracy and precision of the aerial imagery must be determined by comparing aerial imagery-assisted values with field measurements using data that has not been used for calibration of the procedures or allometric equations.
- The methodology does not prescribe a maximal uncertainty level for measurements, nor a discounting mechanism to adjust net emission reductions according to uncertainties. In section 9, it is only required to estimate and report the uncertainty. The lack of either a uncertainty cut-off or an uncertainty discounting mechanism, jeopardizes the reliability of the calculated emission reductions. There must be some mechanism in place that requires minimal accuracy standards.
- The methodology bases a lot of its assumptions regarding the baseline conditions on measurements in “the vicinity” of the project, or “similar areas”. There is no guidance on how to determine such a reference area. Please provide a strict procedure to demarcate a relevant area that can be used to determine baseline conditions in. Two examples:

- P 14: the annual area of forest conversion parameter is absolutely key to quantify the emission reductions. The procedure to determine the annual area of forest conversion is insufficient. The annual area of forest conversion must be determined using strict procedures and be mainly dependent on the common practice. In addition, it must be much better specified how common practice should be determined: minimal area, minimal/maximal duration of reference period, etc. (1) The conversion area in prior plantation permits is not sufficient. The rate from permits represents the most rapid rate possible and must be constrained by practical considerations and common practice. Even if it is permitted to convert a certain area per year, it may not be practical to do so, due to large capital investments required with planting plantations. (2) Specify where the “records of previous land use conversion” may come from. Obviously not from the project area, otherwise they would not be converted. I assume the records are coming from the area neighboring to the project area, and they represent “common practice”, which should be further determined. (3) Specify how the “regional rate of land use change” should be determined: minimal area of the region, how can similarity be demonstrated, etc.
- P 33: depth of peat drainage to be conducted in the vicinity of the project area.