

Dear secretariat,

We have 3 comments on the methodology "Rewetting of drained tropical peatlands in southeast Asia" submitted by Winrock and WWF.

With pleasure we reviewed the methodology, which introduces a welcome new procedure for the quantification of emissions from peatland.

Comment 1: No applicability conditions are formulated for land use in the baseline or project scenario. The type of land use will affect the choice of pools to be included, however. The assumption that ABG tree biomass will always be lower in the BSL than in the WPS as well as the assumption that HWPs can conservatively be omitted, are dependent on land use. The methodology should include applicability conditions to address the type of land use and (in general) provide criteria to judge applicability.

The second applicability condition states:

"Baseline and with-project water levels are modeled overtime using the latest version of the model SIMGRO that has been calibrated for ombrogenous peat swamps in Southeast Asia. Where validation of the model for project conditions using field measurements does not meet correlation coefficient requirements, this methodology is not applicable and cannot be used."

(Source for this calibrated version will be included in final version. Location of online hosting still being finalized.)

Comment 2: The modeling of water level can be done using other tools than SIMGRO. The methodology should establish parameters and equations for forecasts of water levels. The methodology should allow other tools than SIMGRO for the required calculations.

Comment 3: There is no justification in the methodology or the literature that SIMGRO can be applied to tropical peats. The absence of the calibration results challenges the review of the methodology. Will public review be reopened once this material is available? No justification or monitoring of hydrological input parameters (notably hydraulic conductivities) is required by the methodology. These input parameters seriously affect the outcome of the modeling, however.

With kind regards,

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