Template for comments

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TABLE FOR COMMENTS

Name of submitter: __Kelsey Perlman_____

Affiliated organization of the submitter (if any): ___Carbon Market Watch_____

Contact email of submitter: __kelsey.perlman@carbonmarketwatch.org_____

0	1	2	3	4	5	6
#	Para No./ Annex / Figure / Table	Line Number	Type of comment **ge** = general **te** = technical **ed** = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (*to be completed by UNFCCC secretariat*)
3	4	4	ge	**The measures discussed in the concept note should be within the mandate of the CDM board. For the concept note, only agricultural methodologies and actions referenced in the 'Procedural background' should be considered. This covers "integrated mitigation actions in agriculture combining efficient water pumps, more efficient use of fertilizers and efficient animal husbandry".**	**Add in brackets**: …takes into account a number of national/international initiatives [within the CDM Board's mandate].	
8	Table 2	NS-152	te	**Activities that could be discussed for use under the CDM are those whose emissions reductions can be credited with certainty (decreasing water logging, reduced fertilizer use). Avoided deforestation is more difficult to measure and thus the activity addressing deforestation is better suited to the NAMA programme.**	**Strike indicated text:** The NAMA will address methane emissions from rice cultivation. Activities associated with rice cultivation that indirectly affect emissions in the agricultural sector include extent of water logging~~, clearing of forests and woodlands to open up new land for cultivation~~, and use of inorganic and/or organic fertilizers to improve yields.	

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9	Table 2	NS-72, 5)	te	**Carbon sequestration projects on cropland and grazing land should not be considered as an eligible activity type as measurement uncertainty is greatest if erosion or tillage of the soil continues (IPCC), which is the case on cropland and grazing land.** **Only non-carbon agriculture (i.e. CH4 and N20 from agricultural activities) are included, for example, in the EU's Effort Sharing Decision because methodological robustness can be ensured when reducing inputs or using inputs more efficiently. This is the standard that an offsetting mechanism should be held to.**	**Strike**: ~~"5) Increased fixation of carbon by the spread of coffee agroforestry systems (intensified shading). "~~	
10	Table 2	NS-71	te	**Carbon sequestration projects on cropland and grazing land should not be considered as an eligible activity type as measurement uncertainty is greatest if erosion or tillage of the soil continues (IPCC), which is the case on cropland and grazing land.**	**Strike:** ~~Hedges-pasture sections: Dividing pasture areas in farms into more pasture sections allows a more efficient use of pasture and space.~~ ~~Rational grazing: It is a management system of livestock farms that allows herd rotation in pasture sections at least every two or three days, increasing animal density and productivity per hectare. Moreover, due to longer recovery times, pastures are healthier as there is an increase in carbon sequestration in soil.~~	
10	Table 2	NS-71	te	**Carbon sequestration projects on cropland and grazing land should not be considered as an eligible activity type as measurement uncertainty is greatest if erosion or tillage of the soil continues (IPCC), which is the case on cropland and grazing land**	**Strike part of phrase :** (c) improved and sustainable agricultural fertilizer applications, ~~soil erosion measures, and improved agronomic management of soils capacity development programmes~~	

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11	Table 2	NS 217	te	Study : A Systematic Review of Biochar Research, with a Focus on Its Stability in situ and Its Promise as a Climate Mitigation Strategy states "not enough data to draw conclusions about how biochar production and application affect whole-system GHG budgets" Many other civil society organisations and academics scrutinize the unproven technology.	Strike all of NS 217: ~~Within a biochar project, emissions reductions could come from changing fresh organic matter to a much more stable form of carbon through the production of biochar, from increasing soil carbon stocks upon biochar application, possible reductions in soil emissions of GHGs, enhanced carbon storage in growing crops and decreases in fertilizer and other energy-intensive agricultural inputs.~~	
11-12	3.4.1, para. 17-20		ge	Climate Smart Agriculture is an amalgamous term so large it encompasses virtually any agricultural practice even potentially unsustainable ones. While GACSA explores many avenues for emissions abatement soil carbon sequestration remains their focus. The FAO, home of the Global Alliance for Climate Smart Agriculture (GACSA) states an "important emissions reduction pathway is through increasing the carbon-sequestration capacity of agriculture". Crediting of sequestration projects remains highly uncertain with current methodologies, particularly on cropland and grazing land that is continually disturbed. Agroforestry/sequestration projects are better fit to NAMAs, where developmental benefits and sustainable practices compensate for measurement uncertainties. A reference of the GACSA is premature is it includes numerous project types related to soil carbon sequestration that lie outside the CDM's mandate.	Strike paragraphs 17-20	

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13	**Table 3**		**te**	**"Avoided emissions" are notoriously difficult to calculate accurately as it is highly uncertain estimating emissions that never occurred. This reduces the certainty and thus the quality of credits from these types of projects. This is why avoided deforestation through sustainable intensification practices or forest fire management activities should not be credited.** **Sustainable land management includes soil carbon sequestration activities, which lie outside the CDM's mandate.**	**Strike indicated sections below and add text in brackets:** The EX-ACT can be applied on a wide range of development projects from all AFOLU sub-sectors, including besides others projects on climate change mitigation, sustainable land management [(excluding soil carbon sequestration activities)], watershed development, ~~production intensification~~, food security, livestock, ~~forest management~~ or land use change.	
13	**Table 3**			**Concerning the European carbon calculator to promote low carbon farming practices, it focuses on crop yields (sequestration, sustainable intensification practices), which in terms of GHG reductions relies on avoided emissions, which are not a reliable basis for crediting.** **In the case of sustainable intensification, emissions increase overall and should not be considered in an offsetting mechanism because it increases overall emissions while only decreasing emissions per individual unit.**	**Strike where indicated below:** In addition to the GHG emission quantification, the tool proposes mitigation options ~~and sequestration actions suitable~~ for single farms. Specific farming practices are recommended on the basis of emission reduction potential, potential leakage effects, inherent costs of implementation, and impact on other environmental issues.	

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14	Para. 27	1-2	Ge/te	**For the concept note, only agricultural methodologies for actions referenced in the 'Procedural background' should be considered. This covers "integrated mitigation actions in agriculture combining efficient water pumps, more efficient use of fertilizers and efficient animal husbandry".** **LULUCF activities besides A/R activities that do not touch on agricultural practices should not be referenced.** **Novel agricultural activities separate from LULUCF activities include agricultural non-CO_2 emissions (e.g., CH_4 from livestock and rice cultivation, N_2O from manure storage and agricultural soils and biomass burning.** **These are included in the EU's Effort Sharing Decision as they are more readily measurable than carbon sequestration activities. Measurement accuracy for carbon sequestration activities in agriculture have the highest uncertainty as cropland and grazing land are continuously disturbed.**	It can be seen that other GHG programmes have developed various methodologies ~~that include soil carbon sequestration, which is not~~ eligible under the CDM.	
15	Table 4		te	**The row addressing 'croplands – plant management' deals with soil carbon sequestration methodologies, which remains difficult to measure/ensure permanence.**	**Strike all the information in the row 'Croplands – plant management':** ~~VCS: VM0017 Adoption of Sustainable Agricultural Land Management~~ ~~VCS: VM0021 Soil Carbon Quantification Methodology~~	

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15	Table 4		te	**The row addressing 'croplands – nutrient management' has two methodologies for soil carbon sequestration, which remains difficult to measure/ensure permanence and which lie outside of the CDM's mandate for that reason.**	**Strike two methodologies in 'Croplands – nutrient management' :** □ ACR: Changes in Fertilizer Management □ ACR: Reduced Use of Nitrogen Fertilizer on Agricultural Crops □ CAR: Nitrogen Management ~~□ VCS: VM0017 Adoption of Sustainable Agricultural Land Management~~ □ VCS: VM0021 Soil Carbon Quantification Methodology □ VCS: VM0022 Quantifying N2O Emissions Reductions in Agricultural Crops through Nitrogen Fertilizer Rate Reduction □ ERF: Reducing greenhouse gas emissions from fertiliser in irrigated cotton ~~□ ERF: Estimating sequestration of carbon in soil using default values (model-based soil carbon)~~ □ JCM: Methodology for N2O reduction by using coated fertilizers (Draft methodology is developed but not approved yet)8	
15	Table 4		Te	**The row addressing 'Croplands — tillage / residues management' deals with soil carbon sequestration, which remains difficult to measure/ensure permanence and which lie outside of the CDM's mandate for that reason.**	**Strike:** ~~GS: Increasing Soil Carbon Through Improved Tillage Practices~~	

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15	Table 4		Ge	Peatlands rewetting is less subject to the permanence question of other carbon sequestration activities and thus may be suitable for crediting. However, it should be determined if the activity falls under LULUCF or purely agriculture to determine if it falls under the scope of consideration for this concept note.	Strike the row for 'Rewet peatlands drained for agriculture' ~~□ ACR: Restoration of Degraded Wetlands of the Mississippi Delta~~ ~~□ ACR: Restoration of California Deltaic and Coastal Wetlands (currently under development)~~ ~~□ VCS: VM0024 Methodology for Coastal Wetland Creation~~ ~~□ VCS: VM0027 Methodology for Rewetting Drained Tropical Peatlands~~	
15	Table 4		Te	Biochar should not be considered for reasons previously stated	Strike the row for 'Biochar application'	
16	Table 4		te	The row addressing 'grazing lands – plant management' references methodologies for soil carbon sequestration, which remains difficult to measure/ensure permanence and which lie outside of the CDM's mandate for that reason.	Strike the row for 'grazing lands – plant management': ~~ACR: Grazing Land and Livestock Management~~ ~~□ ACR: Compost Additions to Grazed Grasslands~~ ~~□ VCS: VM0017 Adoption of Sustainable Agricultural Land Management~~ ~~□ VCS: VM0021 Soil Carbon Quantification Methodology~~ ~~□ VCS: VM0026 Methodology for Sustainable Grassland Management (SGM)~~ ~~□ VCS: VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing~~ ~~□ ERF: Sequestering carbon in soil in grazing systems~~ ~~□ ERF: Estimating sequestration of carbon in soil using default values (model-based soil carbon)~~	

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16	Table 4		te	**The row addressing 'grazing lands – fire management' references methodologies for soil carbon sequestration through avoided emissions. The difficulty of measurement has been previously referenced.**	**Strike the row for 'grazing lands – fire management':** ~~VCS: VM0032 Methodology for the Adoption of Sustainable Grasslands through Adjustment of Fire and Grazing~~ ~~ERF: Emissions abatement through savanna fire management~~	
16	Table 4		te	**The row addressing 'organic soils – restoration' references methodologies for soil carbon sequestration, which remains difficult to measure/ensure permanence and which lie outside of the CDM's mandate for that reason.**	**Strike the row for 'organic soils – restoration':** ~~ACR: Avoided Conversion of Grasslands and Shrublands to Crop Production~~ ~~CAR: Grassland~~ ~~VCS: VM0017 Adoption of Sustainable Agricultural Land Management~~ ~~VCS: VM0021 Soil Carbon Quantification Methodology~~	
16	Table 4		ge	**The row addressing 'degraded soils – restoration' would need to reference activities where the soil restored is then left undisturbed, such as with peatland rewetting, which may fall outside of the scope of agriculture CDM.**		
17	Table 4		te	**The row addressing 'Agroforestry (including agropastoral and agrosilvopastoral systems)' would reference soil sequestration methodologies, which remains difficult to measure/ensure permanence and which lie outside of the CDM's mandate for that reason.**	**Strike the row:** ''Agroforestry (including agropastoral and agrosilvopastoral systems)'' which is included two times in the table.	