SCM0009: Public Comments

Methodology for Afforestation, Reforestation and Revegetation

This methodology was open for public comment for the dates 28th February 2024 – 28th March 2024.

Comment Submitted by: Maria Fernanda Buitrago

Organization: South Pole

Country: Colombia

This comment was received via email to the Social Carbon Foundation

Comment:

Page	Section	Sub-Section / Clause / Criteria	Suggestions / Comments / Remarks
		General questions:	1. What is the longevity concept here? Is the carbon stock meant to be permanent towards 100 years? Good to add a clarification 2. It was not very clear what the eligibility concept for passive restoration vs. active restoration. For instance if passive restoration can be done in areas where there is still some percentage of vegetation or areas that have been cleared of forest at some point (10 previous years). Some clarification will be useful.
2	2	Summary description of the methodology: "Depending on the type of project activities implemented the methodology has provisions for monitoring to demonstrate additionality and determine the crediting baseline at every verification"	What will happen if a project is not additional at year 5 of implementation because the restoration activity became a new common practice in the area? What will happen to all the investment in this project? This could increase the permanence risks and perhaps drive some reversals, due to an increase on the opportunity cost, and/or a failure on the financial sustainability of a conservation project.
4	4	"a) Demonstration of projected financial sustainability after	Is it expected to present a financial plan to support the conservation area after the end of the crediting period. Meaning towards 100 years?

		the project end date period;"	
4	4	c) A curriculum of ongoing capacity-building that facilitates long-term carbon stock stewardship.	Towards 100 years? That will be good to specify the expected longevity.
4	4	6. Any soil disturbance from the project activity (i.e., from site preparation): a) occurs only once during the project crediting period (i.e., at site preparation);	Do these activities are considered like project emissions?
4	4	Table 1: "No species should represent more than 50% of total. Note: In systems where naturally one species dominates this point does not apply.	Good to clarify if what is expected is that "not a single species should represent more than 50% of individuals or 50% of biomass."
5	4	Table 1. "Minimum number of native species planted"	Good to clarify as it has been done before in the text, that for specific ecosystems if literature demonstrate otherwise the species composition will be evaluated case by case (i.e. mangroves, spekboom, oak forests, bamboo forests, palm forest, which could be quite monospecific)
5	4	Table 1: "Max. 10% of total trees after 20 years (*or following documented best forestry practices). If for profit, only for community profits, as a sustainable income source or to continue with restoration activities."	Good to take into account that community agroforestry projects still might need to renew the main crop trees such as cacao or coffee, and this could represent more than 10%. I guess we can support this with best practices but good to double check with the SC team, that renewing trees in the agroforestry system is allowed.
5	4.1	Table 2: Selected Carbon Pools under Baseline and Project Activity	It could be useful to differentiate the carbon pools of baseline from those from the project? In this table we understood that SOC could be included in the baseline but NOT in the project scenario as a gain in carbon. Later on, we saw in equation 11, that yes, we can include SOC in the project scenario. So perhaps some clarification is needed in the table on

7	6	Baseline: "If the active restoration project is not within 200 meters of a native forest, no performance benchmark is required."	Does this mean that if the Project area is not within 200m from a forest, the benchmark approach is not required, and therefore we can plant in areas that have been cleared of natural vegetation in the past? Or what is the eligibility for these areas further than 200m. Also if the project has areas within 200m and areas outside 200m, the benchmark approach needs to be applied to the entire project?
7	8.2	Baseline removals: "Baseline Scenario, the carbon stock changes in the baseline scenario for these applicable areas are represented by the absence of planting and equal to zero."	It seems we did not see a description about the eligible areas, and it leaves a gray area to the eligible locations. For instance the project area could have some persistent trees or some vegetation prior to the plantation activities. Commonly this could be discounted as a baseline. Perhaps some clarity in the pre existing ideal vegetation should be needed.
7	8.4.1	Pre-existing woody biomass: "2) The biomass cleared was invasive or was not native to the project area (e.g. commercial eucalyptus plantation in Brazil) and removal was required for native restoration to be possible; or"	We think the biomass in this case should be accounted as a baseline for the project, since the biomass is indeed extracted from the system by the proponent, in comparison to a natural event such as forest fire?
7	8.4.2	Deadwood	According to the monitoring tables, it seems that DW, litter and soils are accounted by using direct monitoring. Is this the only option or is it possible to include deadwood, litter, and SOC using conservative IPCC values? Especially due to the high costs of SOC measurements? A better clarification should be included.
7	Appendix 1	Performance Benchmarking serves the purpose of evaluating the most realistic baseline scenario for land areas within the project boundary that could undergo passive restoration.	We would like to confirm that is just for passive restoration

Top partial row: "what are the ones optional or not for baseline and for project"

46	Table 2	"Jurisdictional Boundary	It was not clear in the description if this layer should not be included as an area to be removed from the analysis. So far we assumed it is a restriction); like with the ecoregion and policy environment restrictions.

Comment Submitted by: Matthias De Beenhouwer

Organization: African Parks

Country: Belgium

This comment was received via the SCM0009 public comments feedback form.

Comment:

This is a really good methodology that allows to restore and reforest land in settings much more applicable to the environments and landscapes that we work in. There is a crucial period within a few years after deforestation or forest degradation where you can still intervene meaningfully and at scale, it is really important that SC provides for this. We are especially welcoming passive restoration, as this is a very robust and much more resilient way of restoration. Please note that you can always ask to prove financial additionality on this.