

Comments on FCPF CF Methodological Framework, draft Sept. 5, 2013

Submitted by Conservation International (contact Steve Panfil spanfil@conservation.org)

10/2/2013

Please find comments below from several Conservation International staff regarding the September 5, 2013 version of the Carbon Fund Methodological Framework. We appreciate having the opportunity to comment and would be pleased to clarify and to provide additional inputs to future versions of this document.

Recommendations:

Suggest including a list of acronyms

1.1 ER Program Measures is not in the glossary.

How is significant defined?

It would be useful to describe 'forest-related' activities in the glossary, or to reference it to another document that provides the definition. It is important to clarify the extent of 'forest-related' meaning, agroforestry, Non-timber products, wild-fires, plantations...

1.2 How is ambitious defined?

3.3 Does it included only anthropogenic, or natural emissions (e.g. wildfires)? Also it should clarify if long-lived wood products (wood for housing and furniture) should be discounted or not.

5.1 It would be useful to have some language in this indicator suggesting that countries would be allowed to use other (e.g. local-derived) methods if proven that would increase precision or produce more conservative results.

Criterion 6 -It would be more transparent if the data to reconstruct the reference level is available publicly. Only sensitive information should be at discretion of independent reviewers.

6.1 Consider requesting the description of each (selected) carbon pool and GHG considered in the emission factor

6.2 Emission Factor: Consider requesting the contribution of each pool and GHG in the estimation of the emission factor.

Av. Annual emissions...: Emissions should be reported independently if reference level was adjusted

Adjusted emissions...: What would be the different between this point that the (4th) average annual emissions, if adjusted above historical emissions? Consider clarifying or merging both points if reasonable

Criterion 9 -It would be useful to have some guidance in what would be an acceptable (or unacceptable) level of uncertainty.

9.2 Confidence does not need to be capitalized.

11.1 What is the rationale behind 2011 - consider a foot note.

13.3 option 1 - The equations are clear and provide a reasonable option for HFLD countries. However some clarification on timing might be necessary. Consider a country with a very low historical deforestation, applying the equations 3 and 4, the country would have a RL higher than its historical number, although the country could justify such increase, it is very likely that it would happen since the first year. In other words, this methodology might create some hot-air in the initial years.

21.1 It sounds that this monitoring system differs from the monitoring of activity data that would happen at least twice during the ERPA. Any recommendation on the frequency (yearly?)

Pg. 17. Does not need to be entirely in bold letters.

23.2 "Consider" is a weak term that does not require an acceptable level of performance. "**address** social and environmental issues and **identify** risk mitigation measures" would be stronger.

24.1 "Appropriate" is not defined. Suggest including a more precise indication of what consistent an acceptable monitoring arrangement.

24.2 should require results from monitoring of safeguards performance and not just information on implementation. Simply providing "information" is insufficient.

25.3 During ongoing review of the Program, there needs to be an assessment of whether the plan to improve the FGRM was implemented, and whether the FGRM now meets the requirements of 25.1.

26.1 Forest enhancement is a vague term. Suggest "carbon stock enhancement in forests"

28.1 (i) Wording in second sentence is unclear. What are "anticipated implementers"?

34.1 This describes a monitoring plan for non-carbon benefits but uses a confusing description. Suggest "The ER Program proposes a plan for monitoring priority non-carbon benefits."

34.2 Suggest replacing "Information" with "The results of monitoring of non-carbon benefits". As with safeguards, simply providing information is insufficient.

Glossary -Some of the terms in the glossary are not highlighted in blue in the text, also some words in blue are not described in the glossary.