

## Carbon Fund Participants' Consolidated Comments on Chile's Advanced Draft ER-PD

The FCPF Carbon Fund Participants (CFPs) congratulate Chile on the preparation of a detailed ER-PD. Further, CFPs were encouraged by the TAPs assessment that Chile has provided a quality ER-PD with an impressive amount of information. has considerable capacity to consider the Carbon Accounting issues raised by the TAP in order to revise the ERPD so that the ERP may become compliant with the Methodological Framework.

CFPs found the TAP Assessment helpful, and we agree with the findings of this review. **We strongly encourage Chile to address the sections of the ER-PD that have been identified by the TAP as not currently compliant with the Methodological Framework.** In particular, we wish to highlight the following areas:

### Carbon Accounting

CFPs recommend Chile to make a revision to the Reference Period to: 1) include one integrated Reference Period rather than numerous distinct Reference Periods; 2) reflect the updated requirements of the Methodological Framework for the end date to be the most recent date prior to two years before the TAP start the independent assessment of the draft ER-PD; 3) reflect the Methodological Framework that the Reference Period start date should be about 10 years before the end date.

As the TAP notes, the **accuracy and precision estimates** are incomplete and additional information is need on key **uncertainties**.

Provide additional information on **Emissions Factors**, including breaking down the EFs by forest type, including additional information on methods used (tier), and uncertainties.

**Methods for setting the Reference Level and future monitoring, measurement, and reporting** should be demonstrably equivalent.

### Safeguards issues

CFPs appreciated the detail provided in Chapter 14 on safeguards. However, more information on how the program will integrate the **prioritized risk mitigation measures** and the **Feedback and Grievance Redress Mechanism** would be appreciated.

### ER Program Transactions (ER title, land tenure and registry)

Further information on the timeframe for establishing a **registry** is needed.

CFPs note that there is a legal process underway to obtain the **legal arrangements for transfer of titles** – please update on progress and whether the process will be complete by ER-PD stage. And

please explain how this refers to the ability to both conduct the transaction and transfer title. Also, what are Chile's plans in case the legal process does not materialize, or is not completed in time?

Can you please explain more about what the document means on page 259 in saying "Transactions with the Carbon Fund require important decision- making about use and allocation of ERs titles for the fulfillment of the objectives set in the **Nationally Determined Contributions** of Chile"?