

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

SOMETIDO POR:

Comisión Nacional Forestal
Proyectos y Mercados de Carbono Forestal
Periférico Poniente No. 5360
Col. San Juan de Ocotán, C.P. 45019
Zapopan, Jalisco
México

Climate Action Reserve
523 W. Sixth Street, Suite 428
Los Angeles, CA 90014
01/20/2012

En General

(General)

1. Sección 2.1 (p. 6)
 - Cual es la razón por la que no se incluye “la conservación de las reservas forestales de carbono” en la lista de proyectos calificados?
 - **What is the reasoning for not including “conservation of forest carbon stocks” in the list of qualified projects?**

2. Forest Owners must monitor and verify a Forest Project for a period of 100 years following the issuance of any CRT for GHG reductions or removals achieved by the project. (p. 10)
 - Un compromiso de 100 años para el plazo del proyecto no es apropiado para la etapa corriente en el desarrollo de mercados de carbono, las discusiones de REDD+ y el estado de la preparación nacional para participar en REDD+.
 - En ese mismo sentido parece que el compromiso por parte de los propietarios tendría que garantizar el compromiso de generaciones futuras. Desde el punto de vista de permanencia me parecería importante garantizar ese compromiso incorporando nueva superficie para garantizar los créditos y la participación y disminuir el tiempo comprometido.
 - O tienen alguna otra idea para incentivar participación a largo plazo? Prima de precios para proyectos bien establecidos y funcionales? Acceso a inversionistas más grandes?
 - **A 100 year requirement for project length is too long at this stage in the development of voluntary carbon markets, REDD+ discussions and México’s REDD-readiness preparation.**

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

- In the same regard, it appears that the commitment made by the Forest Owners would have to guarantee the commitment of future generations. From a permanence perspective, it would seem to be more effective to guarantee this commitment by incorporating new surface area into the project gradually over time that would generate more credits, guarantee participation and reduce the large, upfront time commitment.
 - It can be a barrier to participation and lead to unforeseen consequences in respect to land use, tenure and conflicting government programs at such an early stage. What other options exist to incentivize long term participation? Price premiums for established projects? Access to larger investors?
3. Sección 3.2.
- La conceptualización para la elegibilidad de los proyectos que se encuentren bajo el esquema de REDD es limitativo, en este momento debería considerar estados que cuenten con iniciativas para la construcción de REDD, como el PEACC.
 - The eligibility condition that the Protocol only accepts projects being designed under a REDD structure is limiting. At this point, the Protocol should also include states in Mexico that have other REDD initiatives, such as State Action Plans for Climate Change.
4. Sección 3.3 y 3.4
- Para la consideración de estos apartados debería basarse en las experiencias de la acreditación legal, tanto de terrenos como acreditación de identidad en los que se basan las reglas de operación de Proarbol, ya que tienen muy bien descritos los requerimientos.
 - These sections must be based in the legal accreditation process that is already established in the ProArbol Rules of Operation, both in regards to land as well as the various identification credentials. The requirements are already well described.
5. Sección 3.8.
- En lo correspondiente a la fecha de inicio del proyecto, esta confuso, es posible que la cantidad de carbono acumulado determine el inicio o no del proyecto? Podrían aclarar este punto?
 - The section that describes the date of project initiation is confusing. Does it mean that the amount of accumulated carbon determines when the project starts? Can you please clarify this point?

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

6. En cuanto al PIA (acuerdo de implementacion del proyecto), es importante señalar que para los apoyos federales este tipo de acuerdos ya se exigen, sin embargo en este tipo de proyectos suele pasar que no todos los ejidatarios o propietarios entran en proyectos, el porcentaje de superficie incorporada debe ser proporcional a la superficie comprometida? O puede ser proporcional al pago abriendo la posibilidad de que se comprometan la gente que al inicio no firmo?
 - In terms of the PIA (Project Implementation Agreement) it's important to note that federal rules already require agreements of this nature. However, often times not all Forest Owners decide to participate in these types of projects. Does the entire land area of a community or *ejido* need to be incorporated into a project, even if there is not 100% agreement by the members? Or can the land area within the project be proportional to those who signed the PIA and receive proportional payments, opening the possibility to allow future participation by those who initially did not sign?

El Desarrollo del Nivel de Referencia

(Baseline Development)

3. This protocol requires that project baselines be estimated as a function of existing forest carbon stocks within the project area and regional deforestation trends calculated for defined management units, based on the National Forestry Commission's (CONAFOR) National Forest and Soil Inventory (INFyS). (p. 4)
 - En términos de la Manejo forestal, cómo será definido? Deforestación hasta un cierto punto? Área basal? Al incluir suelo bajo el manejo forestal, el Protocolo debe enfatizar claramente que se estima el nivel de referencia en considerar la *degradación forestal* también.
 - In terms of forest management, how will this be defined? Deforestation up to a certain extent? Basal Area? To include land under forest management, the Protocol should clearly state that baseline data be estimated with the consideration of *forest degradation* as well.

Salvaguardas Sociales y Ambientales

(Social and Environmental Safeguards)

4. Where possible, this protocol strives to incorporate the principles of the Cancun Agreements at the project level, where sequestration or reduced emission activities occur, through a requirement that projects be verified under the Climate, Community, and Biodiversity Standard, or the Forest Stewardship Council standards for Mexico. (p. 5)
 - Sección 3.7. La verificación de los proyectos bajo un estándar internacional es costosa y tardada y luego ser verificado bajo el CAR nuevamente? El protocolo debería considerar la revisión de los criterios óptimos para atender las salvaguardas sociales y ambientales de acuerdo a banco mundial, considerando los estándares ya aprobados.

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

- The verification of projects by an international standard is costly and very time intensive, in addition to being verified by CAR. The Protocol should consider reviewing optimal criteria that address social and environmental safeguards in agreement with the World Bank and standards that have already been approved.

Eligibilidad

(Eligibility)

5. In addition to SEMARNAT's requirements, the Reserve will require that the management plan include a "carbon plan" that clearly states the rights of the Forest Owner with regards to forest carbon and their ability to engage in transactions, and acknowledges the Forest Owner's participation in the Reserve's program (see Section 11.2.2). (p. 9)
 - Sección 3.5. En este tema es importante clarificar a que se refiere con plan de carbono dentro del Plan de Manejo Forestal. Solo se refiere a transformar las actividades del proyecto como parte de la cuantificación de carbono o se refiere a la subzonificación de áreas exclusivas para los incrementos de carbono dentro de un plan de manejo.
 - It is important to clarify what is meant by the Carbon Plan within the Forest Management Plan. Does it only refer to the need to modify the project activities for carbon quantification or does it refer to the sub-zoning of areas exclusively for increases in carbon within a management plan?
6. The Assembly Act has to be signed by the formal community members (as listed in the Agrarian Registry (RAN) and constitute at least 3/4 of the total members registered. (p. 11)
 - Es obligatorio también que $\frac{3}{4}$ de los miembros comunitarios formales firmen el PIA, o solamente aplica a la Acta de Asamblea? Si no hay unanimidad dentro de la comunidad, existe la opción que individuales pueden optar de no participar? Habrá una forma de distribuir los créditos que excluye los que no participan?
 - Does the PIA also require $\frac{3}{4}$ signatures of the formal community members, or is this just the Assembly Act? If there is not unanimity within the community, can individual members opt out? Will there be a credit distribution scheme that excludes non-participants?

Cuantificación

(Quantification)

7. REDD+ 12: Mobile combustion emissions from ongoing project operation and maintenance. (p. 19)
 - Si se implementan prácticas de RIL (planeación del aprovechamiento, planeación de caminos forestales y brechas), se podrían lograr menos emisiones?

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

- If RIL practices are implemented (harvest planning, road and skid trail planning), could emissions reductions be noticeable?
8. Table 8.2 Descriptions of General Ecosystems for Determination of Vegetation/Land Use Strata. Under “Forests”, it says “Land spanning more than 0.5 hectares with trees higher than 5 meters and a canopy cover of more than 10%, or trees able to reach these thresholds in situ. (p. 26)
- Si árboles que pueden alcanzar estos límites en sitio cuentan como cobertura forestal, habrá un requisito de edad para prevenir que áreas recientemente reforestadas/aforestadas reporten reservas de carbono antes de revisar el nivel de mortalidad? Esta definición no tiene sentido cuando quieres incorporar zonas de reforestación.
 - If trees that can reach these thresholds in situ can count as forest cover, will there be an age requirement to prevent newly reforested/afforested areas from reporting carbon stocks before mortality has been checked?

Efectos Secundarios

(Secondary Effects)

9. REDD+ 9 “Nutrient Application” (p. 19)
- Aclaración en el uso de nutrientes como una fuente secundaria. FSC no le gusta certificar operaciones que utilizan fertilizantes ni pesticidas. Si un Plan de Manejo Forestal lleva un componente de la intensificación agrícola que incluye fertilizantes y FSC no lo aprueba, la única otra certificación de salvaguardas disponible al proyecto, según el Protocolo actual, es CCB.
 - Clarification on the use of nutrients as a secondary source. FSC does not like to certify operations that use fertilizers or pesticides. If a Forest Management Plan has an agriculture intensification component that includes fertilizers and FSC does not approve, the only other safeguard certification available to the project is CCB.

Fugas

(Leakage)

10. From Worksheet 10.1. Identifying Project Leakage Risk. Harvested Wood Products. (p. 47)
- Esas medidas de mitigación se parecen a las prácticas de Manejo Forestal Sustentable. Cómo distinguirá el Protocolo entre proyectos de MFS y proyectos implementando prácticas de MFS? Es necesario diferenciar las actividades del manejo y de mitigación de fugas. Las actividades para mitigación de las fugas se refieren a las actividades adicionales para la disminución de riesgos de acuerdo al análisis previo y deberán considerarse aparte.
 - These mitigation measures resemble Sustainable Forest Management practices. How will the Protocol differentiate between SFM projects and projects implementing SFM

Comentarios para el Borrador Protocolo Forestal de México

Comments on the Draft Mexican Forest Protocol

practices? It is necessary to differentiate between management activities and mitigation activities. Activities that mitigate against leakage refer to additional steps taken to diminish risks according to a previous analysis and should be considered separately.

11. Worksheet 10.1 (p. 47)

- Muchos de los riesgos de fuga parecen relacionarse a programas federales del uso de suelo más amplios y fuera del alcance de los Propietarios Forestales. Por consiguiente deben identificarse dichos riesgo para ser atendidos.
- Many of the risks for leakage seem to be more related to larger government land-use programs and out of the reach of Forest Landowners. However, their risk assessment suffers.

Permanencia

(Permanence)

12. 11.1.1 Unavoidable Reversals (p. 49)

- En lugar de solamente retirar los proyectos CRTs de una reversión inevitable, deben considerarse como actividades de restauración para ayudar a recuperar el carbono y los servicios ecosistémicos perdidos.
- Instead of just retiring CRTs in the case of an unavoidable reversal, add restoration activities to help speed up the recovery of lost carbon and ecosystem services.

13. 11.1.2 Avoidable Reversals. If the reversals are not compensated after one year, the Reserve will submit an additional notification to the Federal Environmental Protection Agency (PROFEPA), which will initiate administrative enforcement activities. (p. 49)

- Qué son las actividades administrativas que emprenderá PROFEPA? Están reglamentadas las sanciones administrativas?
- What are these administrative enforcement activities? Are the administrative sanctions regulated?

14. 11.2.5.1 Natural Disturbance Risk. Management activities that improve resiliency to wildfire, insects, and disease can reduce these risks. Management activities that shift harvesting practices from live sequestering trees to trees that have succumbed to natural disturbances reduce or negate the reversal depending on the size and location of the disturbance. (p. 57).

- Apoyamos a esas actividades de mitigación. Definitivamente están dentro del alcance de los Propietarios Forestales.
- We support these mitigation activities. They are definitely within the reach of Forest Landowners.