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ACTION
RESERVE

SUMMARY OF COMMENTS AND RESPONSES DRAFT GUATEMALA FOREST PROTOCOL VERSION 1.0

Two sets of comments were received during the Public Comment Period for the draft Guatemala Forest Protocol V1.0 from the Climate Action Reserve. The Reserve staff presents below the summarized comments with their respective responses. The public comment period for the draft Protocol ran from October 16, 2023 to November 14, 2023. In addition to the comments presented below, a number of editorial comments were made which, although not presented in this document, were considered by the Reserve for the final version.

The documents with the comments can be found on the Reserve's website at:
<https://www.climateactionreserve.org/how/protocols/ncs/guatemala-forest/dev/>

COMMENTS RECEIVED BY:

- 1. Anna McMurray - Forest Carbon Technical Advisor- Wildlife Conservation Society (WCS)**
- 2. Clemente Romero Olmedo -Attorney at Law, Lecturer and Public Policy Advisor- Cronem Consultores/ITAM/Universidad Anáhuac México Norte**

1. Section 3.13

1. Comment (Wildlife Conservation Society)

In the experience of WCS Guatemala, one of the main threats to the activities included in this Protocol is forest fires. Therefore, it is important to mention it explicitly.

Response C1

Thank you for your comment. Forest Projects must derive a reversal risk rating to determine the contribution to the buffer pool. Wildfires were considered as one of the permanence risk categories for calculating the reversal risk rating. However, it's important to note that the buffer pool is a combined pool and thus all credits in the buffer pool may be used to compensate for a reversal due to any risk category or type of reversal.

2. Section 3.6

2. Comment (Cronem Consultores)

In Latam, the problem of land tenure has similarities (public and special (agrarian) registries with outdated information), extensive and complex legal processes (such as inheritance processes); but for the purposes of the Guatemala Protocol, I consider the wording to be clear and adequate.

Response C2

Thank you very much for your comment.

3. Section 4

3. Comment (Wildlife Conservation Society)

Controlled/prescribed burns are sometimes necessary to clear invasive species prior to plantings. Important to clarify whether the CH₄ and N₂O emissions from biomass burning for site preparation are included or excluded.

Response C3

Thank you for your comment. Methane and nitrous oxide emissions from prescribed burns for invasive species control are considered de minimis. Moreover, the conservative assumption that 100% of biomass will be removed, thus assuming 100% of CO₂ to be emitted, is likely an overestimate of emissions, compensating for any potential CH₄ or N₂O emissions not accounted for.

4. Section 5.2

4. Comment (Wildlife Conservation Society)

We do see an opportunity for unscrupulous project developers to potentially take advantage of this provision to the detriment of climate integrity. If the activity area has not been in forest cover within the past 10 years (ie., meets the performance standard test for additionality) simply because it is in productive use such as for crop production or cattle ranching but just so happens to no longer be in this use moving forward, the project developer could claim additionality even though the forest may grow back

naturally without any intervention. Consider adding more details to the performance standard test requiring project developers to provide evidence that the area would remain unforested/degraded/etc. in the baseline scenario (e.g., evidence of continued degradation by wildfires, presence of invasive species preventing tree regrowth, etc.).

Response C4

Thank you for your comment. The Protocol considers the change from agricultural, or livestock use to forestry use to not be common practice due to the financial incentives and barriers. The costs associated with establishing a forest where it did not exist are high with potential economic returns not seen until the medium or long term. Lands used for agriculture or livestock, on the other hand, provide short term financial returns. Due to these financial barriers, it is not considered common practice for lands managed for agriculture or livestock grazing to be converted to forests without an additional financial incentive, such as via the carbon market. Moreover, the Protocol requires that natural regeneration be excluded from the forest carbon inventory and ineligible for crediting.

In addition, we will include a requirement for project developers to state the justification for why intervention is required for reforestation and the discrete actions they will implement. Verification bodies will apply professional judgement to confirm the accuracy of the project developer justification.

5. Appendix C.1

5. Comment (Wildlife Conservation Society)

We looked at this page and could not find these data.

Response C5

The Reserve is working on the default values and, when ready, will provide those to the WG and Observers prior to publishing on the website.