

Template for comments

Date: 27 January 2016

Document: Concept Note: Exploration of methodological options for developing 'agriculture CDM'

TABLE FOR COMMENTS

Name of submitter: Debbie Reed, Executive Director

Affiliated organization of the submitter (if any): Coalition of Agricultural Greenhouse Gases (C-AGG)

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#	Para No./ Annex / Figure / Table	Line Number	Type of comment ge = general te = technical ed = editorial	Comment (including justification for change)	Proposed change (including proposed text)	Assessment of comment (to be completed by UNFCCC secretariat)
1	7/8		GE	The secretariat provides a comprehensive list of why mitigation activities in the agriculture sector have been limited, which includes high transaction costs, challenges with quantification, measurement, and monitoring, high uncertainties associated with quantified reductions, and restrictive monitoring requirements. As part of the solution for addressing these issues, the secretariat provides two solutions: the development of new methodologies and measures for reducing transaction costs and scaling-up the use of programmes of activities.	C-AGG agrees with all of the challenges and solutions presented by the secretariat. However, C-AGG encourages the secretariat to consider additional solutions that will increase the number of agricultural projects undertaken. C-AGG has been a strong proponent for the need to reduce transaction costs to increase project development through the use of biogeochemical process models, the inclusion of technologies such as remote sensing to provide economically viable project monitoring, and through the use of aggregation by project developers to reach economies of scale by including multiple land owners under a single project. In addition to the solutions listed in section 8, C-AGG encourages the secretariat to consider explicitly including these additional solutions as options that will be considered.	

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2	28(a)(i)		GE	The concept note outlines “areas that could be further explored for possible development of new methodologies” including improved grazing land and livestock management. The current note does not provide additional details regarding the specific practices that will be considered nor does it provide a guarantee that methodologies under this category will be developed.	C-AGG strongly encourages the secretariat to specifically identify in the concept note practices that will be considered for future methodologies including improvements/changes to biotic sequestration (above- and below- ground), changes in fertilizer use (including changes in rate, placement, timing, and form), and improved breeds with higher productivity. For specific options that should be considered, the secretariat should review the American Carbon Registry’s (ACR) Grazing Land and Livestock Management methodology. Additionally, C-AGG strongly supports the inclusion of at least one additional methodology that captures the impacts from improved grazing land and livestock management.	
3	28(b)(i)		GE	The concept note outlines “areas that could be further explored for possible development of new methodologies” including improved crop nutrition management. The current note does not provide additional details regarding the specific practices that will be considered nor does it provide a guarantee that methodologies under this category will be developed.	C-AGG agrees that there is a need for the development of additional methodologies that capture all beneficial aspects of changes to crop nutrition management. C-AGG encourages the secretariat to specifically identify in the concept note practices for consideration including changes in emissions associated with improvements to rate, nutrient type, placement, timing, and the use of time released fertilizers. Specifically, the secretariat should review ACR’s two nutrient management methodologies, and the Climate Action Reserve’s Nitrogen Management protocol for practices to consider.	

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4	28		GE	The concept note outlines “areas that could be further explored for possible development of new methodologies and standardization of existing methodologies.” However, the concept note fails to include the specific areas for consideration during the discussions around standardization and streamlining.	Given the limited detail provided for how methodologies may be standardized, C-AGG suggests including additional specifics for the options that will be considered during this discussion. C-AGG proposes adding specific topics to the standardization bullets (a(ii), b(ii), and c(i)) including the development of standardized baselines for crops beyond rice, the option of calibrating and validating biogeochemical process models for more regions and growing conditions, and the use of remote sensing for monitoring. All of these improvements will lead to lower transaction costs that will help improve the economics associated with project development.	