ISOMETRIC

# Reforestation v1.1 Protocol

## Public Consultation Summary

Published on October 3rd, 2025

## Context

Isometric held a public consultation on its Reforestation v1.1 Protocol to receive stakeholder input on this Protocol and associated Modules.

The public consultation was announced on the 1st of July, 2025. The period of consultation lasted 30 days, with the final day as the 1st of August, 2025.

After the initial public consultation, the feedback received was considered for incorporation into the Protocol and associated Modules. All stakeholders have received responses to the submitted feedback.

This document summarizes the feedback received during the public consultation and the revisions included as a result of the comments. Content in italics and brackets are excerpts from the public consultation version of the protocol to give the reader necessary context behind the comment.

We thank all participants for their time.

## Summary of feedback received

| Theme | Resolution | Comment | Section Number |
|---|---|---|---|
| Reforestation v1.1 Protocol | | | |
| Included and excluded carbon pools | Soil organic carbon is still an active area of research that Isometric continues to monitor. We appreciate these comments and will continue to review the emerging research and incorporate advances into our Protocols as we feel there is sufficient evidence to ensure rigorous and conservative crediting of additional carbon pools. | [*Soil, deadwood, and litter carbon pools are excluded from the calculation of CO2eStored,RP due to large uncertainties in quantification approaches and/or relatively small contributions to the total forest carbon pool.*]<br><br>The IPCC is using 3-6% of AGB as deadwood and 1% as litter. That currently is scientific consensus. Why would you include those pools? | 9.3 |
| | | Carbon storage in soils is very easy to measure and reliable. In addition, the amount of sequestered carbon is immense and can constitute between 10-20% of all carbon stored within the project lifetime. Please refer to the work of Van Straaten and Edzo Veldkamp for this. E.g. https://www.pnas.org/doi/10.1073/pnas.1504628112 | 9.3 |
| Increased clarification of terms/definitions | We thank the reviewers for highlighting these areas where more clarity could be beneficial. We have updated the language and added additional text to provide more clarity on the content and better reflect the intent of the text. In some instances we have retained broader language since our intent is | [*Reforestation activities include planting tree seedlings, facilitating natural regeneration, and/or ongoing management of the forest to maximize and preserve the carbon removed from the atmosphere that is stored in tree biomass.*]<br>Expand the list of activities or make clear that the activities are not limited to the ones listed, for example:<br>'Reforestation includes but it is not limited to | 1.0 |

| | | | |
|---|---|---|---|
| | to capture any relevant activities/information that supports a more conservative approach. We further note that in some of these instances more detailed language/requirements are provided in subsequent sections of the text. | planting tree seedlings, facilitating...'<br>OR<br>Expand the list of examples to include direct seeding, soil transposition, etc. | |
| | | [*Projects must not occur in regions where significant reforestation activities are driven by market demand, local and/or national incentives*]<br><br>As per the definition of region below. The same region may encompass several countries (and hence several markets, incentives, policies and legislation, specially in Africa and Europe). The definition of region should include some geopolitical boundary. Otherwise you would be assuming that a project in Cote d'Ivoire is under the same incentive as Ghana or Togo. Or that North and South Korea share similar policies. | 4.2 |
| | | [*Note that selective harvesting and harvesting of non-timber forest products is permissible under this Protocol, in consultation with Isometric.*]<br><br>Please provide definition | 4.2 |
| | | [*Reforestation activities include planting tree seedlings, facilitating natural regeneration, and/or ongoing management of the forest to maximize and preserve the carbon removed from the atmosphere that is stored in tree biomass.*]<br><br>Managing existing forests is not a definition of reforestation. | 1.0 |
| | | [*The Project must not disproportionately harm Indigenous Peoples*]<br><br>Not sure why the 'disproportionately' is required here. I would just state that 'The Project must not harm Indigenous People and Local underserved, or marginalized....' | 4.3 |
| | | [*Violation of this principle would include monoculture plantations, or plantations limited to several high-value timber species whose composition does not resemble native community assemblages (see Section 6.4), planted in regions where timber is common practice and thus the infrastructure exists to support wood harvesting.*] | 4.2 |

| | | | |
|---|---|---|---|
| | | Define common practice (VM 0047 states that it is practiced by 15% of farmers in the region). I suggest that the definition should be based on area, not on number of farmers. | |
| Grammatical and syntax errors | We appreciate these typos and issues with the text being flagged. We have updated the document accordingly. | [*Equation 8*]<br><br>The IS value calculated and provided in Appendix A, Table A1 does not seem correct based on equation 8. Is this a typo or error? The leakage discussion is super complicated. It would be helpful to show several worked examples that use different approaches. | 8.3.5.1.3 |
| | | [*Area-based Quantification of Above-ground Biomass*]<br><br>These links lead me to a 404 page, but I'm assuming they are just not written yet? | 9.3.2 |
| References | We agree that this is a potentially useful reference for Projects and have added it to the text. | [*e.g., Walker et al., 2022*]<br><br>Another very interesting reference to identify potential forest cover under different scenarios is "Potential tree cover under current and future climate scenarios," published on 03 April 2025 by Caspar T. J. Roebroek et al | 4.1 |
| | | [*This historical forest presence and ecological suitability must be robustly evidenced by data of the following types*]<br><br>As mentioned above, this research can also be used: "Potential tree cover under current and future climate scenarios," published on 03 April 2025 by Caspar T. J. Roebroek et al | 4.1 |
| Clarification of Project viability/eligibility | We appreciate that this requirement has become more detailed with this update. The intent is to clarify the opportunity for the addition of new areas to the Project. However, we do not allow for areas to be removed once activities have been initiated in the area in order to ensure robust accounting of the carbon impacts of the project and prevent potential scenarios of areas where reversals have occurred simply being removed from the Project | [*The Project Boundary must be set at the time of project initiation and cannot be modified beyond the addition of new areas to The Project once the crediting period begins.*]<br><br>Why would there not be a procedure to remove project area (only addition, not reduction?). Earlier version was not this prescriptive. | 4.0 |

| | | | |
|---|---|---|---|
| | rather than the requisite accounting of the reversal being completed. | | |
| Setting realistic, actionable standards for avoidance of commercial forestry practices | We appreciate these concerns regarding eligibility, however the proposed hypothetical scenarios would not necessarily be relevant. The intention of this text is to ensure a) forest restoration would not occur without Carbon Finance and b) the Project is not at a high risk of being converted to timber production due to the prevalence of timber production infrastructure and activity. For the former, we emphasize that forest restoration in the context of this Protocol is the restoration of native forest ecosystems, not the establishment of monoculture tree cover for timber production. For the latter, we emphasize the distinction between the existence of species which could be used for timber from the actual practice of commercial timber production. Thus, while every Project will need to be assessed, these presented hypotheticals are unlikely to make a Project ineligible. | [*Projects must not occur in regions where significant reforestation activities are driven by market demand, local and/or national incentives, or forestry policies that would lead to forest restoration without Carbon Finance*]<br><br>This rule would exclude large portions of land that are suitable for carbon reforestation. Why should it not be possible to conduct carbon reforestation in areas that are dominated by e.g. Teak plantations? Instead of a rule like this, commercial plantations should be excluded qualitatively but also from the dynamic baseline monitoring pixels. | 4.2 |
| | | [*planted in regions where timber is common practice and thus the infrastructure exists to support wood harvesting*]<br><br>What about plantings of few native timber species in regions where timber is not common practice? | 4.2 |
| Clarity of buffer pool process | We appreciate the reviewers for highlighting the need for more clarity in this situation. We have added additional text to Section 9.4.4 which states that removal of biomass as part of site preparation will not be considered a reversal event and, as such, would not trigger compensation from the Buffer Pool. | [*If the net CO2e removal term (Equation 12) in a Reporting Period is found to be negative (forest carbon stock at t < forest carbon stock at t−1), Buffer Pool Credits are canceled equal to the net emissions from the Reporting Period.*]<br><br>How will you handle this in the first years - have buffer pool go into negative? The years of key 'negative' we see are the first 1-3 years in term of clearing and preparing the site, and here there is no buffer to be taken. Verra doesn't take these types of 'BAU losses' from buffer pool, you go into cummulative negative then only get credits once you've gone into net positive in the future | 10.4.3 |
| | | [*If the Reversal has depleted The Project's share of the Buffer Pool, The Project will be in* | 10.4.3 |

| | | | |
|---|---|---|---|
| | | *a deficit, and must make up the loss within the next Reporting Period, or within one year of the loss event if the loss occurs during the Ongoing Monitoring Period*.]<br><br>As above, TBC how you plan on this in initial years, i.e first 3 years might be negative due to prep | |
| Increased clarity on procedure for dynamic baselining | Based on these comments, we have made a number of revisions to Section 9.4 to provide more detail on the dynamic baseline procedure. Under this protocol, Isometric handles all aspects of the baseline determination, but the procedure (proxy selection, matching, etc) is informed by scientific research and consultation with data providers to ensure robust quantification of the dynamics of interest, including assessment of uncertainty (note that this is covered at the Isometric Standard level). This procedure is further reviewed by the VVB. We will continue to review advances in research and look for ways to enhance the clarity and transparency of this process. | [*Project Proponents may suggest areas that could constitute suitable control pixels or features for matching based on their expert knowledge of their unique system. However, the ultimate determination of control pixels will be done by Isometric following the procedure and criteria below.*]<br><br>I may have missed it, but I don't think the concept of control pixels has been introduced yet. It might be helpful to clarify what dataset or layer these control pixels are being sourced from. | 9.4 |
| | | section 9 - how much correlation is required to use a given proxy for control pixels?<br><br>Similar to the leakage section, some worked examples with pictures and dummy variables along with outcomes and calculations would really help to aid understanding.<br><br>Shouldn't the correlation between the proxy and AGB be accounted for when using the ratio of the proxy data?<br><br>Are there accuracy thresholds for control pixel data or allowable datasets? | 9.4 |
| | | [*Uncertainty in the dynamic baseline*]<br><br>This section does not contain any specifics Isometric will take to assess uncertainty in the baseline and account for uncertainty in the various input datasets mentioned here. What steps or calculations will be made to quantify uncertainty to ensure conservativeness as mentioned? | 9.4.5 |
| | | This Protocol uses a dynamic baseline approach to quantify the counterfactual impact on forest carbon stocks if the project activity had not occurred. Dynamic baselines will be independently determined and transparently reported by Isometric at each | 9.4 |

| | | | |
|---|---|---|---|
| | | Verification to determine any deduction in Credit issuance based on the Baseline scenario. Credit issuance will only occur for carbon removal that is determined to be additional via the following procedure. The following section outlines the workflow that Isometric will take; the Project Proponent is not responsible for carrying out the steps in this section. Project Proponents may suggest areas that could constitute suitable control pixels or features for matching based on their expert knowledge of their unique system. However, the ultimate determination of control pixels will be done by Isometric following the procedure and criteria below. | |
| Increased specification of land tenure requirements | We have revised the text in the relevant sections to provide more detail on the requirements and risks to land tenure. We hope that this provides more clarity to Project Proponents. | [*The Project Proponent must have legal, documented land tenure*]<br><br>This section still is a MUST for legal land tenure, no 'or' for our case as discussed where we do not hold tenure and we juts have contractual access/rights over the project area | 5.1 |
| | | [*history of revoking legal agreements regarding land ownership, access, and usage*]<br><br>This makes perfect sense, but I would recommend including a time frame (in the last xxxx years) | Appendix E |
| Species monitoring | We appreciate this comment for highlighting a need for more clarity on these requirements. We have added text to the corresponding section to clarify that Project Proponents are required to identify all relevant species and whether they may be affected by the Project Activities, but monitoring plans are only required for species for which there is an identified risk associated with Project activities. | [*For the purposes of this Protocol, the IUCN Red List designation of Vulnerable (VU) shall be considered Threatened, and Near Threatened (NT) shall be considered Rare.*]<br><br>This is a very broad definition, particularly given the monitoring, planning etc. below. This would have me having a full plan for over 400 things for Estonia alone - ranging from flies, ferns, mosses, etc. Is this really necessary? Some points are very obvious that it's not impacted, and can the population monitoring plans be limited to, say, endangered only? | 6.3.1 |
| Limiting soil disturbance | We have added additional language to this text to further emphasize that soil disturbance should be limited to Project implementation. As discussed above, we continue to assess scientific | [*The Project should strive to limit soil inversion to 25 cm during project establishment*.]<br><br>It may be better to define the procedures or calculations to estimate soil carbon loss if the | 4.4 |

| | | | |
|---|---|---|---|
| | literature on soil carbon quantification and will implement updates in the future. | inversion occurs deeper than 25 cm. Ideally, the methodology could also allow such inversion only once in the area, as the case for some forestry projects, with the long-term benefits compensating the soil disturbance. | |
| Comments on the species selection in reforestation projects | Isometric currently does not allow non-native, not range-expanding species, such as Eucalyptus, due to concerns around increased fire risk and impact on water resources. Isometric continues to stay updated with the latest science and may update this stance if/when the science is more established. | Very good section. I recommend a position on the use of non-native, not range-expanding species on the project.<br><br>For example eucalyptus can be used as an early pioneer to tutor growth of native trees and generate early cashflow for landowners in successful forest restoration intiatives in Brazil.<br><br>I recommend that non-invasive, non-native species could be used if they function as ecosystem engineers for forest restoration that will be removed in the project crediting period.<br><br>Example: Brancalion et al. 2020. Exotic eucalypts: From demonized trees to allies of tropicalforest restoration? | 6.4.1 |
| | | [*Project Proponents must not introduce species invasive to the region or similar climates, geographies, or ecosystems of the project area*]<br><br>Projects that have more than 10% of exotic species should be non-eligible. There is no good reason to plant exotic species beyond a 10% treshold. | 6.4.1 |
| Deforestation within leakage monitoring zone | As noted in the comment, we do anticipate different baseline levels of deforestation based on regional practices. This is accounted for in the leakage monitoring by comparing the rate of deforestation in close proximity to the project area (Leakage Monitoring Zone) to the regional rate, which should account for these practices as a baseline. Further details of this process are discussed in Section 8.3.6. | [*Annual monitoring of forest cover over time is used to calculate deforestation rates over time*]<br><br>Interested to see how you do this in practice - for example, for our regions you'd need the data from the local forest registries, state national forests, etc. and exclude any deforestation from these areas which has a harvesting permit and a mandatory replanting permit (i.e usual forestry, not being deforested to replace agricultural activities etc.)... the activity shifting leakage could only be calculated using deforestation of existing private forests which were not in the forest registry, which is country by country... | 12.5 |
| Data used for leakage | The provided IS and NL values within the Protocol are | [*The data hierarchy for obtaining information* | 8.3.2.1 |

| | | | |
|---|---|---|---|
| calculations | intended to act as default values. However, Project Proponents may use different Project-specific values, and we have added language to clarify the requirements for this data and the approval process. The requirements for this are detailed in Appendix A. For PPP, we have added text to Section 8.3.2.1 to indicate that additional municipal data and/or scientific literature can be used in tandem with remote sensing to assess PPP. | *for PPP is set out below*]<br><br>Specially in community-based project or smallholder projects, there is little records of physical production or land holdings at the project site with production information.<br><br>Similarly, while remote sensing identifies the crop type, it may fail to quantify PPP (unless Isometric provides literature or methodologies to support that).<br><br>Would using municipality or literature values be feasible as an option 4? Otherwise certain stakeholders will likely be excluded from this methodology. | |
| | | [*Isometric has carried out a literature review of and values to inform , as well as values for for certain regions. Where The Project falls into these regions, the default values provided must be used. This is because understanding which values to use from literature is challenging as academic papers are typically not written with this purpose or audience in mind. Isometric has completed this work for certain regions to lessen this complexity and provide consistency across projects.*<br><br>*In general, the NL values are more speculative than the IS values and often rely on assumptions about the yield-price elasticity that have not been empirically confirmed.*]<br><br>Concern is specifically with market leakage modeling, specifically NL/IS values which seem to be speculative deductions that discourage reforestation on marginal or retired lands. Iso itself acknowldges that it relies on unvalidated assumptions about yield price elasticity, yet said paramaters are applied deterministically in the market leakage calculations and directly reduce GHG removal credits. Even with evidence of land use conversion wording seems like you still face these automatic deductions. Some type of pathway to overide this with justification to reduce or nullify leakage deductions here would be helpful. Or even a list of defualt NL/IS values by crop or location for context | 8.3.5.1.3 |

| | | | |
|---|---|---|---|
| | | In GS cattle are simply sold off to market prior to acquisiton and are given no second thought as leakage is then 0 | |
| | | [*Where The Project falls into these regions, the default values provided must be used. The procedure and requirements for sourcing default values for NL are set out in Appendix A.*]<br><br>This is very helpful but, as above for IS, project developers may have more site-specific or commodity specific values that could be more accurate or more updated. Is there a possibility to use it when justified? | 8.3.5.1.4 |
| MRV procedures and responsibilities | As shown in Figure 1, Isometric is responsible for dynamic baselining, leakage zone monitoring, and reversal monitoring during the ongoing monitoring period. For Projects which opt to use global AGB maps for quantification, Isometric will assess data products (see more details in module) which meet the requirements. While we recognize that there are challenges to definitively separating woody and non-woody biomass through remote sensing, many remote sensing techniques (e.g., SAR) have different sensitivities to different types of biomass and the required benchmarking against field data plots further assesses that the data products are representative of woody biomass, even if the products are not explicitly labelled as such. | [*Figure 1*]<br><br>This is missing clearly showing that YOU will take on the project monitoring via remote sensing (i.e the method we will take), and seems to suggest here that the PP must do all monitoring? | 5.5 |
| | | [*living aboveground woody biomass (AGB)*]<br>Note: The majority of the MRV remote sensing providers we've been speaking to do NOT differentiate between woody and non-woody in their readings, they only measure total living AG and BG... | 9.3 |
| Increased clarity on Project timeline | We have revised and added additional text to Section 5.0 to more explicitly address timelines of grouped projects and to clarify that the first Reporting Period should coincide with the initiation of Project activities. We hope that these revisions | [*The Crediting Period is the interval between project initiation (first activity on site associated with The Project) and the end of the last Reporting Period. The Crediting Period is made up of successive Reporting Period*s]<br><br>Our projects will have land added to them on | 5.2 |

| | | | |
|---|---|---|---|
| | address the concerns expressed in the comments. | an ongoing basis based on new plantings within the group - as the crediting period here is then fixed, this means effectively the crediting period of future land to be added is shorter, correct? And we'd need to effectively create a new project every, say, 5 years, versus it being rolling, with each instance having an X year crediting period based on its activity start date? | |
| | | [*The Reporting Period is the interval of time over which removals are calculated. The first Reporting Period starts at project Validation. Subsequent Reporting Periods begin at the end of the previous Reporting Period.*]<br><br>Unclear - does this mean credits for removals pre-validation are list? Example: our sites planted in 2022, we start validation in 2025, receiving this in on 1 Jan 2026 - does that mean there is no credits for the removals from 2022 to 2025? | 5.3 |
| Mortality monitoring during early growth stages | After initial planting, Isometric recommends field monitoring of trees for mortality. We encourage this given that remote sensing capabilities of early vegetation growth can be limited and the initial growth period can also be a vulnerable period for vegetation. Further, frequent monitoring can support early intervention to prevent further losses. However, we note that this is a recommendation rather than a strict requirement, and Project Proponents have flexibility in determining how to conduct their monitoring. | [*project surveys at 6-month intervals*]<br><br>Note - remote sensing data normally only available on a 12 monthly basis, so this would be based on an anecdotal check in with the landowner on progress | 5.3 |
| | | [Table 2 - recommended every 6 months]<br><br>THis freqency may be adequate for the first 1-2 years but it could be moved to annual, at laest in tropical forests. | 12.8 |
| | | [Monitoring Requirements]<br><br>I believe that this recommendation goes beyond the carbon methodology and is more operational.<br><br>The methodology has no hard requirements for survival or tree density, and higher mortalities will reflect into lower carbon in the reporting period. Hence, more context should be provided to understand the requirement of a survival monitoring. | 12.8 |
| Quantifying Project risk | Predicting reversal risk of reforestation projects is still a nascent area of research. Isometric will continue to evaluate specific drivers that increase or decrease a Project's risk and will | [*Does the Project Proponent have a presence in negative press content?*]<br><br>This needs more definition. Press content could vary from a respected journal to biased social medias. Also past accusations that | Appendix E |

| | | | |
|---|---|---|---|
| | incorporate more specific adjustments in future updates as the science becomes clearer. For the time being, we opt to take a conservative approach. | made to press could be reverted after investigation, but remain in the media. | |
| | | [*prevents double-counting of project Credits and NDC contributions?*]<br><br>The project may provide a plan to prevent double counting under the government and justify. This could be mitigated by project developers. | Appendix E |
| | | [*Risk assessment Table E1*]<br><br>The structure of the Risk Assessment is great. However, project proponents will have several mitigation activities to reduce risk. The scoring guidelines could provide scores in the case that efficient and verifiable mitigation measures are in place. | Appendix E |
| | | [*Pest and disease outbreak risk*]<br><br>Could also be based on risks identified for the species used. Mitigation would include pest control among project activities and financial model. | Appendix E |
| Land cover classification requirements | We acknowledge that there are challenges in the availability of land cover datasets. Because of this, these provisions are denoted as "should" rather than a "must", indicating that Project Proponents should strive to use datasets that meet these requirements but other datasets are permissible for use if such datasets are not available. | [*Have a minimum classification accuracy > 90%, with reported uncertainty values*]<br><br>"Would it be useful to specify whether this requirement is that the overall accuracy should be over 90%? Or only the accuracy for the classes of interest? My thought here is that classifications often get higher accuracies for tree/not tree than for distinguishing other vegetation classes.<br><br>Additionally, if the land cover classification is meant to be used to restrict planting projects in areas of terrestrial/tidal wetlands, would it also make sense to require that the land cover classification being used actually includes these as classes (and that the data have high enough accuracies for these classes)?" | 4.1.1 |
| | | [*Have annual data for at least the 10 years prior to project initiation.*]<br><br>Forests would not regenerate and disappear in one year. Additionally, this requirement may force project developers to seek global datasets with lower spatial resolution or accuracy for regional land uses, instead of more precise models with lower temporal | 4.1.1 |

| | | | |
|---|---|---|---|
| | | frequency. I would recommend bi-annual, which is the current requirement of strict labels such as ABACUS. | |
| Guidance on determining system boundaries and calculation of emissions | Further details on the calculation of emissions for the project (and its comparison to a baseline scenario) are described in the GHG Accounting Module. In particular, we highlight that the GHG accounting is intended to capture emissions that account to >1% of removals and which are attributable to the Project activities (i.e., would not have occurred in absence of the Project). While Projects must follow the requirements within the Module, we note that some of the scenarios mentioned in the comments might not actually be applicable. | [*After Reporting Period - must be estimated and accounted for in the first Reporting Period or amortized in line with allocation rules*]<br><br>I get what you're tryign to do here, but I have no idea how this is supposed to be calculated or estimated... staff travel in 100 years? How many staff? How are we travelling in 100 years? I feel like this becomes a lot of time spent coming up with a value which is token and in no way accurate? | 8.1 |
| | | [*Emissions relating to monitoring activities over the Project Commitment Period.*]<br><br>Same question here... practically, for a 60+40 year project, we have to account for and ammortize the emissions of 100 years of satellite data? How can this even reasonably be estimated/calculated? | 8.1 |
| | | [*Emissions related to MRV activities (e.g., measurements, sampling, or commissioning LiDAR flights).*]<br><br>Where you're doing the MRV for RS purposes, you'll provide the emissions relation to the source you choose? Also how is this calculated, the emissions of a satellite? | 8.1 |
| | | [*Table 1*]<br><br>This list is extensive and may add great complexity. Also some of these emissions are very small and may not be significant.<br><br>It would be great if Isometric could place some precedents for estimating these values (e.g. transportation emissions are only calculated when project areas are more than 20 km apart, for example).<br><br>If maintained, these numbers should be calculated for the baseline scenario as well. | 8.1 |
| | | [*These studies also indicate that emissions associated with reforestation projects still make up a material fraction of net CDR for these projects. Studies29 also highlight that other existing methodologies vastly* | 8.1.1.1 |

| | | | |
|---|---|---|---|
| | | *underestimate emissions associated with reforestation projects, therefore leading to a risk of over-crediting.*]<br><br>Are these emissions calculated for the baseline scenario as well? | |
| Timber harvesting in the post-Project Commitment Period | We recognize that selective harvesting conducted in a sustainable manner can provide economic support for maintenance of Project carbon stocks. The intention here is to prevent extensive loss of carbon stock via clear cutting, which would be considered a reversal event. We have revised this language to clarify that it is events which would be considered reversals which must be prevented. | [*Projects must have a plan for long-term maintenance of forest carbon stocks after the Project Commitment Period to prevent timber harvest or Reversals after The Project ends.*]<br><br>Our projects will include timber harvest, and this is the main method of ensuring ongoing financial viability... this here is then a MUST to prevent timber harvest, so is this still a 'should'? | 5.5 |
| Addressing unrecognized Indigenous People | We are aware that the context and intricacies of the relationship between Indigenous Peoples, land claims, and governing bodies can be highly variable, globally. As a result, this Protocol is not intended to cover every potential situation in detail. Instead, we require Project Proponents to work with experts who are familiar with the local context and history of the Project area as part of the FPIC process, which must be completed whenever there are Indigenous Peoples who may be impacted by the Project. We have also added some additional language to Section 5.1 on requirements for the Project Proponent to demonstrate land tenure, and the aforementioned experts should be positioned to help Project Proponents ensure compliance with these requirements for their particular situation. | [*Prior to the commencement of project activities, Project Proponents are required to assess if Indigenous Peoples will be impacted by project activities, in consultation with Isometric. Impacts may include, but are not limited to:*<br><br>*Project activities that occur on land or territories that is owned, occupied, or utilized by Indigenous Peoples, regardless of whether or not this claim is recognized by the local governing body or held by rights to self-determination, as recognized by the United Nations;*<br>*Project activities that will affect natural resources necessary for the livelihoods or cultural rights of Indigenous Peoples.*<br>*Project Proponents must consult a reputable third party or subject matter expert to assess if Indigenous Peoples will be impacted by project activities. The results of this report must be included in the PDD. If the report identifies potential impacts to Indigenous Peoples, the Project Proponent must enact a Stakeholder Engagement Plan consistent with the principles of Free, Prior, and Informed Consent (FPIC) as outlined by the United Nations (UN) Declaration on the Rights of Indigenous Peoples in 2007 and expanded upon by the Food and Agriculture Organization of the United Nations in 2016.*] | 6.5.1 |

| | | | |
|---|---|---|---|
| | | Need more clarification on how to interact with a group of Indigenous peoples whose claim is NOT recognized by local governing body, and how that should effect how we intereract with their claims (aka how to verify). It seems like this could be tricky to navigate.<br><br>Possible undue burden to also recognize claims of non-recognized IP. | |
| Other relevant Protocols | We recognize the relevance of these activities, and Isometric is developing new protocols that explicitly cover methods for addressing agroforestry, improved forest management, and harvested wood products. | [After the Crediting Period. Reversals that occur after the Crediting Period must be quantified (see Section 10.5) and fully compensated by the Buffer Pool within one year of the loss event.]<br><br>Need to discuss how harvests with HWP and mandatory replanting will be treated - this shouldn't be considered a reversal with repayment? | 10.4.3 |
| | | [*contractual access to the project area throughout the Ongoing Monitoring Period*]<br><br>I think this continues to be a problem for us - if we have a pine forest, 100 years rotation period, with Verra today we do a 100 year project, the LTA kicks in around year 60. With your project, we thought we'd be able to get more credits by having the full 100 year crediting period and accounting for HWP after the end, but if this would mean having the customer sign a 140 year contract.... 100 years is already hard enough to get people to sign for, 140 years will be impossible.... | 5.1 |
| | | [*Transitioning to alternative income streams which promote the maintenance of forest carbon stocks.*]<br><br>Note, this for us would be timber harvesting (with mandatory replanting) which you say should not be in point in section 4, but our case would argue this IS the model which provides ongoing financial viability | 5.1 |
| | | [*selective harvesting*]<br><br>selective harvesting and/or group-fellings or smaller clear cut up to 0,5 hectares. From a forestry perspective you would utilize these different cuts depending on which species | 4.2 |

| | | | |
|---|---|---|---|
| | | class (pioneer, gap opportunist or shade species) you want to promote. | |
| Compliments/Miscellaneous | We very much appreciate the encouraging comments and look forward to continuing to advance this Protocol. | [*This is because understanding which values to use from literature is challenging as academic papers are typically not written with this purpose or audience in mind. Isometric has completed this work for certain regions to lessen this complexity and provide consistency across projects*.]<br><br>This is very helpful | 8.3.5.1.3 |
| | | [*Post-Project Commitment Period*]<br><br>This is a nice way to address the permanence independently of the project developer. | 5.5 |
| | | [*Seedling and Germplasm pipeline, 6.4.2 Prioritize sourcing from nurseries that employ local community members and align with the requirements and suggestions of Section 6.5: Safeguarding of Community Livelihoods, thereby generating equitable economic opportunities and fostering long-term community investment in the Project's success.*]<br><br>Good to reinforce. | 6.4.2 |
| | | [*Project Proponents must not introduce species invasive to the region or similar climates, geographies, or ecosystems of the project area17, 18. The definition of 'invasive species' in this Protocol is consistent with the Convention on Biological Diversity's definition of Invasive Alien Species, being a "species whose introduction and/or spread threaten[s] biological diversity"*]<br><br>The prescriptions for species selection are new to v1.1. They do place a high standard on our species selection, but it is one that we already meet. | 6.4.1 |
| | | [*The Project Proponent must develop a Stakeholder Engagement Plan in accordance with the requirements outlined in Section 3.5 of the Isometric Standard. The plan and supporting documentation, including evidence of meetings or other forms of engagement, must be submitted in the PDD.*]<br><br>The Stakeholder Engagment plan is a new requirment, but one that we already fufill. | 6.5.1 |

| | | | |
|---|---|---|---|
| | | [*Positive impacts should be felt by all stakeholder groups identified in Section 6.5.1. Project Proponents should consider which groups may face the brunt of negative community impacts, and how positive community benefits may be shared equitably with these and other marginalized groups.*<br><br>*It is recommended that the Project Proponent provide support to the local communities and ecosystems to establish region specific mitigation strategies to adapt to changing climates.*]<br><br>New principles for stakeholder engagment that focus on environmental justice. Our work with [redacted] should cover this. | 6.5.2.2 |