

**Comment No. 1**

**From:** Simon C. Bird <simon@wildlifeworks.com>

**Sent:** Wednesday, June 5, 2019 23:50 (GMT)

**To:** kh-pm-pi@jcm.go.jp

**Subject:** Public inputs (Methodology) KH\_PM004

Methodology No.: KH\_PM004

Version: Ver1.0

Title: Reducing deforestation and forest degradation through forest conservation in Cambodia

Name: Jeremy Freund and Simon Bird

Affiliated Organization: Wildlife Works

E-mail: [simon@wildlifeworks.com](mailto:simon@wildlifeworks.com)

Country: USA

Part of the document (Cover sheet/A/B/C/etc): General

Page of the document: General

Input on the page (including justification of the change): See attached Document

Proposed change (including proposed text): See attached Document

To Whom It May Concern;

Thank you for the opportunity to submit input on the JCM methodology KH\_PM004 Reducing deforestation and forest degradation through forest conservation in Cambodia. Please find the attached document containing our input on this methodology.

Thank you

Simon Bird



05 June 2019

To Whom It May Concern;

We appreciate the opportunity to provide comments on the proposed JCM methodology “Reducing deforestation and forest degradation through forest conservation in Cambodia”, version 1.0. We believe that this methodology will be important to the advancement of REDD+ in Cambodia and ultimately help to conserve the country’s remaining intact forests and biodiversity therein.

Reviewing the methodology, we are glad to see an approach that references the national forest reference level (FRL) as submitted by Cambodia to the UNFCCC, as we feel that this fits well with the prevailing national REDD+ Program design rationale. This supports the notion that JCM REDD+ project(s) using this methodology align with other non-JCM REDD+ projects/activities and can correctly nest into Cambodia’s national REDD+ Program.

We are, however, concerned about the method prescribed in the methodology to derive the Project’s reference level from the national FRL. These concerns are based on Wildlife Works’ extensive experience developing REDD+ projects and shepherding them through the jurisdictional/sub-national nesting process. It appears that the Project reference level calculated in section G is done so independently of a national / sub-national nesting design. We feel this could lead to nesting problems and specifically make it difficult for JCM Projects to align with other REDD+ activities within Cambodia’s national REDD+ system.

Firstly, we contend that FRL assignment to nested REDD+ Projects and/or activities should be determined at the national REDD+ Program level, not at the Project methodology level. This is to ensure that design decisions surrounding distribution of the FRL are made centrally and in adherence with Cambodia’s national REDD+ policy and forest conservation needs.

Secondly, we suggest that FRL allocation to REDD+ Projects and/or activities that is centrally determined in a spatially explicit manner. This is primarily to ensure that the sum of the reference levels assigned to Projects/activities is not greater than (i.e. “rolls up” to) the total national FRL to be distributed. As currently written in Section G, the Project reference level is calculated as an application of FRL transition probability, but does so independently of the total available FRL. Alternatively, if the FRL were allocated to projects in a spatially explicit manner within the country (i.e. using a FRL map from which each project determines its reference level) by a central entity, each Project’s annual performance would be ensured to roll up to the national level in a manner consistent with Cambodia’s nesting design. We feel this would result in a more equitable design, ensuring that Projects’ reference levels reflect local deforestation threat, and that they are allocated potential for revenue proportionate to the effort and costs that they face in conserving forests and biodiversity.



We believe that due to the two issues discussed above could yield inconsistencies in the determination emission reductions from the reduction of deforestation in Cambodia, as well as problems nesting Projects/activities into the national REDD+ system.

We are more than happy to discuss these concerns further with the methodology developers and provide more detail on suggested alternative methods that can be used to equitably assign the national FRL at the Project/activity level.

Thank you

Jeremy Freund  
Vice President Carbon Development  
Jeremy@wildlifeworks.com

Simon Bird  
Director Forest Science  
Simon@wildlifeworks.com