Submission 1

Affiliated Organization: Philippine Rice Research Institute

Country: Philippines

Documents	**Comments/ Recommendations**
For both PDDs : **Methane gas reduction project in Bulacan, Laguna, and Batangas Province**s	
A.3 and E (pages 2 and 8 in both PDDs) and the MSS sheet in the excel file	While there is an existing agreement with the LGUs, I strongly recommend that the proponents coordinate closely with the National Irrigation Administration (NIA), as it is the agency responsible for the actual release of irrigation water. Maintaining a strong working relationship with NIA is essential, as they determine the timing and volume of water delivery. In irrigation systems, farmers are organized into Irrigators' Associations (IAs) based on their location along the hydrological toposequence or within a clustered area known as a Turnout Service Area (TSA). These groups are directly managed by NIA, and understanding this structure is particularly important when implementing water-saving technologies, such as AWD. I would also suggest referring to the new guidelines by NIA on Carbon Credit Project using AWD for guidance.
A.3	In addition to indicating the town/city or geographical location of the sites, the proponents are encouraged to include the specific names of the associations or farmer groups involved to facilitate easier validation and reference for MRV.
Criterion 1, B.2 (page 5 in both PDDs)	The project should collect evidence-based data to confirm whether farmers' organizations were consistently practicing traditional flooding their fields before the Project. This requires gathering information on historical and current water delivery schedules in the canals—particularly the number of days surface water recedes before the next irrigation rotation—alongside relevant secondary data and on-the-ground observations of field conditions (compare with the rotational irrigation schedule). For example, in most national irrigation systems that follow rotational irrigation scheduling, it is important to assess whether the current rotation intervals are sufficient to maintain continuous flooding up to the next water release. This assumption must be thoroughly validated to accurately reflect actual field practices in the area before the AWD project.

Criterion 2, B.2 (page 5 (Bulacan), page 6 (Batangas and Laguna)	The project proponents should clarify how irrigation will be managed in cases when water is not available in the canal at the required time. In many national irrigation systems, actual water availability is subject to rotational schedules, and NIA cannot always release water on demand. How does the project propose to address this constraint to ensure timely irrigation and avoid yield loss?
E.2, page 10	Regarding the question, “What is the minimum farm size required for farmers to join?”—it is important for the project to consider the hydrological structure of an irrigation system, especially when implementing AWD at a large scale. Rather than focusing solely on individual farm sizes, I recommend targeting the Turnout Service Area (TSA) level or groups of contiguous fields that share the same water source or inlet. This approach minimizes the risk of seepage from adjacent fields managed by farmers who may not be participating in the project. Implementing AWD in contiguous plots with a shared inlet allows for more effective water control and enhances the feasibility of applying AWD uniformly across the area. Thus, I suggest working closely with NIA so they can correctly identify the TSAs in the irrigation system.
JCM MPS excel file	How is AWD managed during the wet season when rainfall is frequent? I understand that NIA typically does not release irrigation water during this period. However, with hundreds to thousands of hectares considered in the project during wet season, how do you effectively implement AWD under such conditions? This information should be transparent in the PDD.

Submission 2

Affiliated Organization: Yanmar Philippines Corporation

Country: The Republic of the Philippines,

Page of the document: Page 2, Location of Project

- Comment 1:

While the target area of the project is Bulacan province including the municipality of San Rafael, Faeger/Yanmar is also starting a small pilot project in Bulacan province including San Rafael. This could cause the double count of the project in some fields.

- Comment 2:

These projects are coordinated with Municipalities, but no NIA organizations are involved.

According to the guideline from National Irrigation administration office central titled as “Procedures for carbon credit projects using alternative wetting and drying (AWD) technique” issued on May 6th 2025, all the carbon credit projects using AWD within the service areas of NIA, should comply with the procedure described in the guideline including the coordination with NIA and IA.

These projects don’t follow this guideline based on our confirmation with NIA Region 3 Office.

Submission 3

Affiliated Organization: Sagri Co., Ltd

Country: Japan

We believe that to prevent double-counting of credits and ensure project transparency and environmental integrity, the precise location information for every field involved—such as polygon data or representative coordinates—should be registered and made publicly available. However, we are concerned that the project does not currently provide this information.

We hope the project will proceed in a manner that addresses and resolves our concerns.