



Reply to comments to the public consultation on Cercarbono's Protocol for Voluntary Carbon Certification

Version
4.0

Medellín, 29 July 2022

**Reply to comments to the public consultation on Cercarbono's Protocol for
Voluntary Carbon Certification Version 4.0**

Addressed to: Participants of the public consultation.

Dear participants,

This is to thank you for your participation in the fourth public consultation of the ***Cercarbono's Protocol for Voluntary Carbon Certification Version 4.0***, held from 22 June 2022 to 21 July 2022.

All the Comments received from the staff of the 39 participating entities are particularly important, as they will allow us to strengthen our certification programme and strengthen or create spaces for participation of current and new actors from different economic sectors who wish to contribute to climate change mitigation.

The ***Cercarbono's Protocol for Voluntary Carbon Certification Version 4.1*** is now available at www.cercarbono.com. The table below details the Comments received in the consultation and their respective replies. For privacy reasons, all 120 Comments received are listed anonymously.

Once again, thank you very much for your valuable input.

Sincerely yours,



Carlos Trujillo Echeverri
CEO Cercarbono

Note: Some of the comments in Spanish had spelling and writing errors. The English translation may not be entirely accurate.

No.	Text/Comment	Protocol Section	Reply
1	For CCMPs of RGei "In this type of CCMP no significant emissions from leakage are expected; however, those generating CH ₄ emissions from displacement of agricultural or livestock activities should be considered". Comment: The consideration of leakage in the M/UT/F-A01 methodology has a wider scope, complemented by the AR-TOOL15 methodological tool, which considers the estimation of CH ₄ and CO ₂ emissions from applicable activities. P 50. 6.2.6.9	6.2.6.9 Land use sector	The text is adjusted according to the comment.
2	Comment: Consider an item for Software industry (datacentres, SaaS, communications, etc).	ND*	We'll be on the lookout for when the occasion arises. .
3	Comment: I would be interested in talking to you about carbon certificates and my recycling process.	ND*	This comment is addressed to the area in charge.
4	"Coherence The results of GHG emission inventories...", Comment: It is considered that this principle should not refer to "GHG emission inventories" but to "results obtained by the CCMP activity". It is suggested that the term "comparable" be omitted from this definition as this could lead to confusion with the definition of the comparability principle.	2.1 Principles to be considered by CCMPs	The text is adjusted according to the comment.
5	" <i>Permanent Carbon credits generated by CCMPs should be permanent ...</i> ". Comment: Does this permanence principle apply only to projects in the sectoral area "land use"? If so, it is suggested to include it in the document. It is recommended to look for a new definition of permanence, as the explanation uses the same term and therefore does not generate a clear idea of this principle.	2.2 Principles considered in carbon credits	The text is adjusted according to the comment.
6	" <i>Professional scepticism Attitude of staff in charge of validation and verification processes...</i> " Comment: This concept is not clear. As part of the profile of the professional in charge of the work, it could possibly be an expression such as "Rigour or comprehensiveness" with regard to the analysis of data or information.	2.3 Principles to be considered by VVBs.	Concept in line with ISO 14065:2020 and ISO 14066:2011, definition added for clarity.
7	Comment: These objectives should be at the beginning when the programme is presented. In the Governance	3.1 Programme objectives	The location of section 3.1 has been changed in line with the

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	component there should only be the Governance outline that defines the standard for its purpose. Page 21		comment. The rest of the text has been left unchanged.
8	<p>Comment: Are these provisions in line with the CDM? This question is asked because EPM had a project in the CDM that reduced on average 71,213 tCO₂e/year but applied two methodologies that the CDM lists as small-scale: "AMS- III.H Methane recovery in wastewater treatment" and "AMS-I.F Renewable electricity generation for captive use and mini-grid". Does this mean that if a project reduces more than 10,000 tCO₂e/year, it cannot use small-scale methodologies? Please clarify in the document. Page 25</p>	4 Scope	Although Cercarbono makes a distinction by project size, this distinction does not apply to the selection of methodologies, as their applicability criteria are set out in the methodologies. The confusing example has been removed.
9	<p><i>"Avoidance of GHG emissions (EvE): adoption of technologies or processes that reduce, control, or avoid GHG emissions to the atmosphere..."</i>. Comment: The expression here could possibly be "Avoided GHG emissions". The recommendation is to review whether it is really necessary, given that all actions that can reduce or avoid emissions would be considered in the components of energy efficiency, fuel switching (wherever it is), generation or consumption of renewable energies, etc. In this sense, review whether it is necessary to maintain it. Page 26.</p>	4.1 CCMP activities	The avoidance of GHG emissions is one of the actions considered within the reduction and its compliance is oriented to plans or processes that mediate or make GHG emissions do not occur, contrary to what happens with energy efficiency or fuel switching where tangible reduction actions are seen for machinery or fuels, respectively. Therefore, it is maintained.
10	<p><i>"...Apart from its methodologies, Cercarbono approves the use of CDM methodologies that are in line with..."</i> Comment: Suddenly, the more appropriate expression would be recognising the use of methodologies...Page 31</p>	5.1 Approved methodologies	It is important to note that the methodologies already developed by the CDM are endorsed or recognised, but Cercarbono must approve their use by the holders or developers in line with the provisions of the certification scheme, so it is drafted in those terms.
11	<i>"... If a particular CCMP activity requires substantially different methodological approaches than those existing in the Cercarbono approved methodologies..."</i> . Suddenly, the more appropriate expressions would be recognised, accepted. P 31	5.2 Approval of new methodologies	See Reply to previous comment (No. 10).
12	<i>"6.2 Description of the methodology</i>	6.2 Description of the methodology	The text is adjusted in accordance with the comment.

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	<p>A CCMP must select a methodology (if it is a clustered CCMP it may select more than one) to demonstrate its mitigation results, which must..."</p> <p>It is considered that a CCMP can select several methodologies (e.g., if it is a WWTP it could use a methodology that discusses methane recovery in wastewater treatment, and at the same time a methodology that addresses electricity generation from biogas) and this does not necessarily make it a "grouped" project. It is recommended to review what is highlighted in yellow. Page 34</p>												
13	<p>Table 2:</p> <table><tr><td>Avoidance of emissions of GEI (EvE)</td><td>Y e s</td><td>No</td><td>No</td><td>D p</td><td>N o</td><td>N o</td><td>N o</td><td>N o</td><td>N o</td></tr></table> <p>Comment: Check throughout the table if this activity is maintained after validating that it is included in the previous activities. It is suggested to add the activity "Renewable Energies (Production or generation and consumption). Page 38 - 40</p>	Avoidance of emissions of GEI (EvE)	Y e s	No	No	D p	N o	N o	N o	N o	N o	6.2.6 Identification of GHG emission sources	GHG emissions avoidance is maintained in line with the reply given to Comment No. 9. This table sets out the mitigation activities covered by the CCMPs. Generation and other activities are covered in the sectoral scope.
Avoidance of emissions of GEI (EvE)	Y e s	No	No	D p	N o	N o	N o	N o	N o				
14	<p>"For CCMP of EvE: In the baseline scenario, CO2 emissions due to the use of fossil fuels for electricity or heat generation (steam or non-steam thermal energy) or in cogeneration, where applicable, should be considered. In the project scenario, GHG emissions are expected to be avoided or not generated; therefore, the different activities that generate GHG emissions should be considered. <i>In CCMPs of this type, no emissions are generated by leakage."</i></p> <p>Comment: Revise. This action can be a consequence of energy efficiency activities, fuel switching, production or generation and consumption of renewable energies, etc. This applies also on pages 43, 47, 48 and 50. P 41.</p>	6.2.6.1 Energy Sector	GHG emissions avoidance is maintained in line with the reply given to Comment No. 9. It is important to mention that each mitigation activity has a different scope, although they can be confused. Normally it is pointed out that activities are more oriented towards energy efficiency or fuel switching, but we should leave the full range of mitigation activities that occur in these sectors.										
15	<p>Comment: Please revise the PTAR example, to define if indeed a grouped project is one that is implemented under more than one methodology. On page 34, it says that a grouped CCMP can select more than one methodology, but on page 54 it indicates that grouped projects are implemented under one or more methodologies. This is considered contradictory. Please clarify where applicable. P 54.</p>	6.4 Grouped projects	The text is adjusted in accordance with the comment .										

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16	<p><i>"To demonstrate climate change mitigation outcomes, CCMPs may set a lifespan of 10 to a maximum of 100 years, except in the case of CCMPs in the land use sector, where the minimum lifespan should be 30 years..."</i></p> <p>Comment: When referring to CCMPs in the land use sector, is the correct term yes "minimum" lifespan or does it refer to "maximum" lifespan? In this section the document mentions that CCMPs can have a lifespan of up to 100 years (note that in the CDM the maximum lifespan is 21 years), but on page 57 (paragraph 6.6) it states that "for CCMPs in other sectors, it can be renewed twice for periods of 10 years". Aren't these two sections contradictory, why talk about a maximum of 100 years when it seems that in CCMPs in sectors other than land use, the duration of the CCMP cannot exceed 30 years? Page 56</p>	6.5 Accreditation period	<p>Yes, indeed it refers to its minimum limit in order to ensure permanence issues mainly due to GHG removals or GHG emission reductions (where applicable) in the land use sector.</p> <p>Furthermore, when it is mentioned that it can be up to a maximum of 100 years, it is to support that the mitigation results are expected to last over that time horizon.</p> <p>Although the renewal of the accreditation period is linked to their lifespan, ranges are established in which CCMPs can obtain direct benefits from the carbon market, as it is complicated to maintain them for more than 30 years; only this situation is considered in CCMPs in the land use sector where the coverage of their lifespan is encouraged to ensure the permanence of the carbon.</p>
17	<p><i>" The holder or developer chooses the start date of the crediting period (day.month.year). For CCMP in the land use sector, the crediting period is 20 years, counting from the time it generates the first GHG removals or GHG emission reductions. For CCMPs in other sectors, the crediting period is 10 years or equal to the duration or lifespan of the CCMP, ..."</i></p> <p>Comment: Aren't there already hydropower plants in Cercarbono with 20-year crediting periods, what to do in these cases when a latest version of the Protocol provides for a shorter crediting period? P 56.</p>	6.5 Accreditation period	<p>When Cercarbono updates its regulatory, procedural, and documentary frameworks, it makes them known to its clients. However, it is important to mention that CCMPs are evaluated according to the frameworks with which they are registered in EcoRegistry; if any of them "mandatorily" need to be changed due to legal situations, they will be communicated about transitions or changes to be made.</p>
18	<p><i>"After the initial accreditation period, if the CCMP has not yet reached its lifespan limit, the accreditation period can be renewed by submitting the Application for Renewal of Accreditation Period form available at www.cercarbono.com,..."</i></p> <p>Comment: Revise the first Comment on page 56 (numeral 6.5) and adjust accordingly. P 57.</p>	6.6 Renewal of the accreditation period	<p>As indicated in the text, the renewal of the accreditation period is in line with the type of CCMP and the sector under which it operates: "For CCMP in the land use sector, it can be renewed as many times as desired, for periods of 10</p>

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			years or for a shorter period, until its duration or lifespan is completed. For CCMP in other sectors, it can be renewed twice for periods of 10 years or for a shorter period, as long as the duration or lifespan of the CCMP is not exceeded".
19	<p><i>"In addition, the CCMP holder must sign a declaration that its CCMP has not been registered for carbon credits under any standard or certification scheme, ... defined for that purpose."</i></p> <p>Comment: Does this declaration include renewable energy certificates? If not, given that this "product" is restricted to sector scope 1, it is recommended to add the following footnote: If a CCMP in sectoral scope 1 has also been registered for renewable energy certificates, it must ensure that the same energy will not be used to simultaneously issue carbon credits and renewable energy certificates. P 61.</p>	6.9.1 Management of legal requirements	This is clarified in the <i>Procedures of Cercarbono's Certification Programme.</i>
20	<p><i>" The range of time between verification events established by the CCMP can be between six months to five years, according to the accreditation period or financial capacity of the CCMP, information which is detailed in Section 8.3.18."</i></p> <p>Comment: Is it necessary to give a lower range for verification events? If there were a case of a hydropower plant that wanted to do verification for the initial three months of its operation, would it not be able to do so under this Protocol? Page 77.</p>	8.3.1 Verification plan	The text is adjusted in accordance with the comment and only the top rank is set.
21	<p>Comment: Same as previous comment. P. 86</p>	8.3.18 Timing of verification events	See reply to previous comment (No. 20).
22	<p>Subsection "integrity"</p> <p>Comment: Delete "all emission sources shall be included". In accordance with the principle set out in ISO 14064-2 2019, quoted: "Include all relevant GHG emissions and removals. Include all relevant information to support the criteria and procedures". Therefore, all relevant emissions and removals support the criteria as to why it is considered as such.</p>	2.2 Principles to be considered by CCMPs	The text is adjusted in accordance with the comment.
23	<p>Subsection "additional"</p> <p>Comment: It is ambiguous whether project developers should use the Cercarbono tool for additionality or</p>	2.2 Principles considered in carbon credits	The text is adjusted in line with the comment and with the update of the additionality tool.

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	whether it is only a recommendation/auxiliary tool. This should be clarified.		
24	"independently verified" Comment: Specify the authorised accreditation bodies for LVOs (any member of the IAF and/or ONAC)	2.2 Principles considered in carbon credits	The text is adjusted according to the comment and reference is made to the section where this information is located.
25	"Risk-based approach" Comment: The level of assurance should always be reasonable according to Resolution 1447 of 2018, so this should be made explicit.	2.3 Principles to be considered by VVBs	The text is adjusted in accordance with the comment and ISO Standards.
26	Subsection "Professional scepticism" Comment: Add a sentence communicating that any assertions in the Project description must be supported by complete and reliable proof or evidence.	2.2 Principles considered in carbon credits	The text is adjusted in accordance with the comment.
27	Subparagraph (a) GHG removal Comment: There are other Negative Emission Technologies that should be considered, such as: Direct Air Capture (DAC) that should already be considered despite their recent adoption around the world, not just Aff/Def (sic) projects.	4.1 CCMP activities	Cercarbono will investigate these technologies. The focus here is only on GHG removals achieved by biomass.
28	Sub-paragraph b) GHG emission reductions, comprising: GHG destruction (DestG) Comment: Should this activity not be classified as part of (a) GHG removal? Or should the decision to consider this activity as "GHG reduction" be justified?	4.1 CCMP activities	Although both activities involve GHG capture, we distinguish between GHG removal and destruction, the former focusing on exclusive capture by the biomass component in the land use sector and the latter on GHG capture (and even recovery) that can be achieved by other mechanisms in sectors other than land use.
29	"Energy demand" Comment: Shouldn't this subcategory belong to the already existing subcategory Energy distribution?	4.2.1 Energy Sector, Subsector	The text is adjusted in accordance with the comment.
30	Comment: the word "Eligibility" should be changed to applicability, as eligibility is a term used exclusively for AFOLU projects as defined in the current protocol. P 34.	6.2 Description of the methodology	It is written: "Establish eligibility, where appropriate", where the last words denote that they do not apply to all sectors. However, it is adjusted for clarity.
31	Comment: Perhaps indicate whether these additional requirements supersede any additional requirements that may be indicated by the methodology used; whether additional	6.2.1 Additionality	The text is adjusted in accordance with the comment.

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	requirements that may be indicated by a methodology must also be met or are optional?		
32	<p>Comment: Revise this case, because in accordance with the practices of other programmes, a project remains valid and eligible to receive reduction credits throughout its credit period, even when circumstances have occurred during the Project's activity that have harmed its additionality, in order to protect the investment of certain Projects and the interests of their holders, such as the principle of retroactivity of the law. It is when a renewal of the credit period is intended that the additionality of a Project must be reassessed. Penultimate paragraph</p> <p><i>"If the circumstances of the programme or Project..." delete, unless it refers to the Standard</i></p>	6.2.4 Establishing the baseline scenario	The text is adjusted in accordance with the comment.
33	<p>Comment: sometimes methodologies include GHGs to be included/excluded, which may be contradictory to this table in terms of simplification or rather be Dp, so it would be to establish a hierarchy of criteria, e.g., if a conflict gas is an issue, the Protocol will override the methodology.</p>	6.2.6 Identification of GHG emission sources	The text is adjusted in accordance with the comment.
34	<p>Comment: Regarding biomass projects, please clarify what is meant by the term "energy crops for feedstock production", which should take into account CO₂, CH₄ and N₂O as emission sources for the project activity.</p>	6.2.6.1 Energy Sector	The paragraph where energy crops are mentioned highlights that it refers to the project scenario, therefore, these GHGs would be considered as an emission source for the project activity.
35	<p>Comment: This section indicates that for projects under the avoided emissions category, no leakage is expected. However, for REDD+ projects (which would fall under emissions avoidance) under Cercarbono's own REDD+ Methodology, it indicates that leakage must be quantified, and a potential area of leakage must be established. This apparent contradiction between the Protocol and the Methodology should be clarified, or precedence should be established between the two.</p>	6.2.6.9 Land Use Sector	The text is adjusted in accordance with the comment.
36	<p>Comment: first paragraph: check if this is still valid, according to decree 446 of 2020 Article 2 dictates that DOEs may conduct validation and verification activities until 31.12.2020.</p>	7 Authorised validating and verifying bodies	Because our programme is international, we do not align ourselves with specific national provisions.
37	<p>Comment: fourth paragraph: it would be pertinent to provide more explanation on this evaluation: how is it</p>	7 Authorised validating and verifying bodies	The text is adjusted in accordance with the comment.

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	evaluated? who conducts the evaluation, Cercarbono, a designated committee?		
38	Comment: fifth paragraph: it should be stated in this document that it is mandatory to prepare such a declaration prior to validation and/or verification activities.	7 Authorised validating and verifying bodies	The text is adjusted in accordance with the comment.
39	Limits of the CCMP Comment: It would be worth mentioning the attributes or characteristics that would make a CCMP "incompatible" with other similar initiatives.	8.2.3.3 CCMP limits	The text is adjusted in line with the Comment and a footnote is incorporated to make this clearer.
40	Comment. It is suggested to mention or limit all permitted methodologies and/or to cite the list of Cercarbono approved methodologies.	8.2.3.5 Quantification and monitoring methodologies	Section 5.1 Approved methodologies lists the methodologies approved by Cercarbono .
41	Comment: The materiality thresholds should be based on a certain amount of emission reductions per year, as these amounts do not specify the period of the threshold: 5% for CCMPs that generate reductions of less than 25 thousand tCO ₂ e on average per year.	8.2.1 Actions prior to validation and verification processes	The text is adjusted in accordance with the comment.
42	Comment: I suggest that the Cercarbono additionality tool should be cited in this section if it is intended that all projects intending to register from now on should use it, or in case the methodology contains its own tool for assessing additionality, it should be used.	8.2.3.4 Selection of the baseline scenario	The text is adjusted in accordance with the comment.
43	Comment: It is proposed that rounding should always be done downwards for baseline emissions and emission reductions, while emissions per project or leakage should be rounded upwards to maintain the principle of conservatism. On the other hand, it is suggested to mention that emissions and emission reductions should be reported in both the PDD and the MR in whole numbers and not allow reporting with decimals. Monitoring parameters, such as emission factors, emission factors, calorific values, among others, may be reported in decimals, and with up to 2 significant figures.	8.2.6 Uncertainty	The text is adjusted in accordance with the comment.
44	Comment: It is suggested that the VVB uploads its own documentation to the platform to ensure fairness and transparency in the registration process.	8.3.12 Information and data control system	The text is adjusted in accordance with the comment.
45	Comment: Cercarbono should consider the option of developing a template for methodology developers, as well as review and approval fees for such methodologies, and add a section to the Protocol.	ND	Cercarbono will review this request.

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46	Comment: Consideration should be given to adding a new sector in the Protocol for carbon capture and storage projects, such as Direct Air Capture, capture with pre- or post-combustion, and geological storage of CO ₂ .	ND	Cercarbono will review this request.
47	DespG Displacement of more GHG-intensive production Comment: To avoid confusion with manufacturing production processes, it is suggested to define as "Displacement of more GHG intensive electricity and/or heat production". P 6.	Acronyms and abbreviations	This type of activity is established in different sectors, it would be difficult to manage if it were specified according to the characteristics reached in each sector.
48	The right column has an empty row under "evidence" Comment: It is suggested that both columns match in their bottom alignment. P 7.	Terms and definitions	It is reviewed and adjusted according to the Comment.
49	The term "Carbon Credit Emission Certificate" appears, whereas in the document it only appears once as "Emission Certificate" Comment: It is suggested to standardise the denomination, if justified. P 8.	Terms and definitions	The text is adjusted according to the Comment, standardising the entries of the term in question.
50	The last row in the left column indicates the term "carbon buffer" under "climate change mitigation", followed in the first row of the right column by "monitoring". Comment: Check that the order in which the terms are presented follows the chosen system (alphabetical), in coincidence also with the reference document (Terms and Definitions of the Voluntary Certification Programme of Cercarbono V2.0). P 8.	Terms and definitions	The text is adjusted in accordance with the comment.
51	The following terms included in the reference document (Terms and Definitions of the Voluntary Certification Programme of Cercarbono V2.0), are included in this section, and do not appear in the document: <ul style="list-style-type: none"> – forestry activity – greenhouse gas storage – woody biomass – co-benefit – co-composting – contract (appears once, but its use corresponds to the definition in the reference document) – waste energy – electronic signature – lift gas – carbon footprint – no carbon taxation 	Terms and definitions	Good comment and review. Cercarbono will release together with version 4.1 of the Protocol version 3.0 of its document: Terms and Definitions of the Voluntary Certification Programme of Cercarbono, where these terms will be deposited.

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	<ul style="list-style-type: none"> – user validation and verification body <p>Comment: It is suggested to remove the indicated terms from this section, as there is no reason to include them. P 7-9</p>		
52	<p>The following terms included in the reference document (Terms and Definitions of the Voluntary Certification Programme of Cercarbono V2.0) are not included in this section, although they appear in the document:</p> <ul style="list-style-type: none"> – programme activity – project activity – remote audit – biogas – carbonate – cement – traffic conditions – woody agricultural crop – potentially significant emission – electrical energy – thermal energy – car fleet – electricity generation – concrete – monitoring report – project boundary (referred to in the document as "CCMP boundary") – alternative raw material – materiality – minibus – Forest Emission Reference Level (referred to in the document as "Reference Level") – level of service – principle – restoration – information and communication technologies – commitment term – overlap (*overlap) – tricycle – unit of energy – reservoir <p>Comment: It is suggested to include the terms listed in this section, as there is no reason to exclude them. P 7-9.</p>	Terms and definitions	Good comment and review. Cercarbono reviewed each term in the document, and they were all included in the list of terms.
53	<p>The term "responsible party", which does not appear in the reference document (Terms and Definitions of the Voluntary Certification Programme of Cercarbono V2.0), is included in this</p>	Terms and definitions	See reply to previous Comment No. 51.

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	section and in the protocol document. Comment: Delete this entry or keep it and update the reference document (Terms and Definitions of the Voluntary Certification Programme of Cercarbono V2.0). P 8.		
54	In the list of sectoral areas of the UNFCCC in the footnote, it is indicated: "... 12" Comment: As the rest of the entries in the list correspond exactly with the terms used either within the scope of the CDM on its official website or in Annex 2 of the Kyoto Protocol, it is considered appropriate to do the same for the indicated entry, which could be left as: "... 12. Solvent use; ..." P 11.	1 Introduction	The text is adjusted in accordance with the comment.
55	First paragraph reads: "...established under that programme". Comment: Since the Protocol refers precisely to this programme, it would seem more appropriate to refer to it here as "...this programme." or else "...the programme." P 12.	2 Principles	The text is adjusted in accordance with the comment.
56	Second paragraph reads: "...climate change mitigation initiatives. These should refer to..." P 12. Comment: If it refers to initiatives, it should be "...These should refer to..." They could refer to principles and then it would be correct, but this does not seem to be the case	2 Principles	The text is adjusted in accordance with the comment.
57	In explanation of Coherence, it is mentioned at the end of the first paragraph: "...consistently well-supported results". Comment: It is suggested to consider the following modification: "...consistently and well-supported results." P 12.	2.1 Principles to be considered by CCMPs	The text is adjusted in accordance with the comment.
58	Subsection: "No double counting" Comment: This principle differs in terms of its denomination on the Cercarbono website, as it is indicated there as "No double counting" It is considered appropriate to standardise both. P 16.	2.2 Principles considered in carbon credits	Cercarbono will launch its new website at the end of August, where the term is standardised.
59	Subsections "Unique" and "Independently verified" Comment: The order of presentation of these two principles is reversed on the Cercarbono website, so it is suggested to use the same order in both cases. P 17.	2.2 Principles considered in carbon credits	Cercarbono will launch its new website at the end of August, with the two principles listed in the order in which they appear in the protocol.
60	General Comment for the section and for the document: Comment:	2.3 Principles to be considered by VVBs	Cercarbono does not make the suggested change because the principles must be

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	It is suggested to change, as applicable, the designation "validation and verification" to "validation / verification" or to "validation or verification", as they can be done jointly or separately, and in particular there will be several verification processes that do not require validation in operating CCMPs. P 17.		complied with by both the validating entity and the verifier, hence the "and", compliance by both is mandatory. The "or" will be used according to the context.
61	Subsection "Responsiveness to complaints". Comment: It is suggested to consider the use of "claims" instead of "complaints", as it takes on a broader meaning (e.g., requests for clarification, review, etc.), as well as a veneer of formality in that way, as a claim may or may not take the form of a complaint. This is more consistent with the spirit of ISO 17029. P 17.	2.3 Principles to be considered by VVBs	The text is adjusted in accordance with the comment.
62	Subsection "Openness" reads: "...on their validation and verification process". Comment: To be consistent with ISO 14065 and/or ISO 17029, it is suggested "...about validation / verification processes in a timely manner." P 18	2.3 Principles to be considered by VVBs	The text is adjusted in accordance with the comment.
63	Subsection "Evidence-based approach to decision-making". Comment: This sub-section corresponds to principles of the V&V process, so it belongs in Section 2.4 where it has apparently already been incorporated, so it is suggested to remove it from here. P 18.	2.3 Principles to be considered by VVBs	The text is adjusted in accordance with the comment.
64	Subsection "Responsibility" states: " The customer and not the VVB has the responsibility to claim conformity with the specified and applicable requirements. The VVB has the responsibility to base a validation and verification statement on objective, sufficient, and appropriate evidence." Comment: To be consistent with the spirit of what is stated in ISO 17029, it is suggested to consider what is intended to be said in the reference paragraph in this respect, modified to match the wording in the Cercarbono Protocol: "The customer and not the VVB has the responsibility for the declared information, as well as for its conformity with the specified and applicable requirements. The VVB has the responsibility that a validation/verification statement is based on sufficient and appropriate objective evidence". P 19.	2.3 Principles to be considered by VVBs	The text is adjusted in accordance with the comment.

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65	<p>Technical direction description paragraph.</p> <p>Comment: It is considered appropriate to include in the description the functions of interaction with other actors (VVB, developers, proposers, etc.) as mentioned for consultants, as there is no such function in another position, and it is conducted here. P 23.</p>	3.2 Organisational structure	The text is adjusted in accordance with the comment.
66	<p>Second paragraph, reads: "...displaced or destroyed) by a CCMP for the duration of the CCMP, may be..."</p> <p>Comment: It is suggested instead of "...during the duration of this...", "...during its accreditation period...", if the above applies. P 25.</p>	4. Scope	The text is adjusted in accordance with the comment.
67	<p>Last paragraph: "with CDM methodologies and apply: large-scale and consolidated to CCMP Type 1 and small-scale to CCMP Type 2. The Cercarbono methodologies do not make this differentiation, but CCMPs should consider the applicability requirements of the selected methodology(ies)". P 25.</p> <p>Comment: It is not clear whether it is an example or a rule the applicability of SSC or AM/ACM according to type, but it is recommended to consider the implications, as the CDM small scale threshold exceeds 10,000 tCO₂e in reductions, and for example projects that migrate and are SSC, would have to develop a new PDD under an AM or ACM. In short, if it is such an example, clarifying it does not seem to help, at least from the wording, and if it is not an example, its implication would be a tightening of rules and monitoring requirements for SSC projects which would reduce the attractiveness of the Cercarbono programme</p>	4. Scope	See reply to Comment 8.
68	<p>It is mentioned that cogeneration actions can be included in both RE and EE.</p> <p>Comment: Of course, the above is possible, but it should be limited, as most cogeneration is not considered as RE, as it is based on fossil fuels, so it should be clarified for the case of RE, that such cogeneration should be based on renewable energies exclusively, as it is not necessarily understood as such.</p>	4.1 CCMP activities	The text is adjusted in accordance with the Comment .
69	<p>It is mentioned that it applies to CCMP type 2.</p> <p>Comment: It is not considered appropriate to limit to small scale this type of projects, as there may be larger project activities. P 26.</p>	4.2.3 Construction sector	The text is adjusted in accordance with the Comment .

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70	<p>It is mentioned for fugitive fuel emissions that applies to CCMP type 1. It is mentioned that it may include fuel and feedstock switching, among others.</p> <p>Comment: Most fugitive emissions projects are located in CCMP type 2, although larger ones can easily be type 1, so it is not considered appropriate to limit the participation of small-scale projects In the area of fugitive fuel emissions, only avoidance, destruction, and displacement apply. P 28.</p>	4.2.7 Fugitive emissions sector	The text is adjusted in accordance with the Comment .
71	<p>The holder says: "Fugitive emissions of fuels from the production and consumption of halocarbons and sulphur hexafluoride (SF6):" It is mentioned that it may include fuel switching, among others.</p> <p>Comment: It is considered that there is an error and the words "of fuels" should be deleted. In the scope of emissions of this type, only avoidance, destruction, and displacement apply. P 28.</p>	4.2.7 Fugitive emissions sector	The text is adjusted in accordance with the Comment .
72	<p>A table of sectoral areas and CCMP activities, together with reduction or removal mechanisms, is included.</p> <p>Comment: Revise table if the above Comments are relevant. P 29.</p>	Table 1	Table is adjusted in accordance with the Comment .
73	<p>General Comment</p> <p>Comment: Several of the activities and procedures described mean the use of resources and personnel in many cases not negligible amounts by Cercarbono, so that analogous to what happens in the CDM field, it is suggested to refer that they may have some cost for the proponents and to elaborate procedures, and if applicable fees, in this regard.</p>	5 Methodological aspects	The text is adjusted in accordance with the Comment .
74	<p>The concept of revision and its consequences in terms of application of the revised approved methodology are explained.</p> <p>Comment: It is important to indicate the scope, as there is no clear distinction within the term "approved" between new methodologies approved within the programme, and those external methodologies that are accepted, such as those of the CDM. This is to avoid the perception (if my interpretation of the spirit of the text is correct) that a methodology approved for use, such as a CDM</p>	5.3 Review of approved methodologies	The text is adjusted in accordance with the Comment .

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	<p>methodology, could be revised and thereafter a revised version of it applied.</p> <p>In the latter case, what would operate is the development and approval of a new methodology which, although based on a CDM or other standard, would be Cercarbono's own in order to avoid such ambiguity. P 31.</p>		
75	<p>The procedure for requesting a deviation and its resolution is explained.</p> <p>Referred to first paragraph:</p> <p>It is considered that Cercarbono should retain technical control over the diversion process as described here, upon notification by the VVB of such a request. The previous wording of "macro review" would seem appropriate prior to this explanation, as it would allow for a uniform approach to be established prior to VVB's intervention.</p> <p>In the case of unilateral determination by the VVB, general guidelines should also be established, such as reference to the CDM or similar validation and verification standard, or relative to Cercarbono or others, or define the term "minor changes", or indicate that this does not apply to certain methodological aspects such as applicability conditions, additionality criteria, etc.</p> <p>This is more important than ever in Colombia due to the recent attempts of usurpation of functions by ONAC.</p> <p>Regarding the second paragraph:</p> <p>If the VVB becomes aware of an unsolicited and approved deviation, this is reported in the verification report as a request for clarification or revision therein by procedure, so it does not need to be indicated here, unless a policy of unilateral determination of provenance is taken by the VVB, which would reinforce the need to narrow or circumscribe such decisions by specific standards or criteria that ensure their correct applicability with respect to the Cercarbono philosophy.</p> <p>Comment:</p> <p>Referred to in the first paragraph:</p> <p>It is considered that Cercarbono should retain technical control over the diversion process as described here, upon notification by the VVB of such a request. The previous wording of "macro review" would seem appropriate prior to this explanation, as it would allow for a uniform approach to be established prior to VVB's intervention.</p> <p>In the case of unilateral determination by the VVB, general guidelines should also be established, such</p>	5.4 Request for methodological deviations	The text is adjusted in accordance with the Comment .

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	<p>as reference to the CDM or similar validation and verification standard or relative to Cercarbono or others, or define the term "minor changes", or indicate that this does not apply to certain methodological aspects such as applicability conditions, additionality criteria, etc.</p> <p>This is more important than ever in Colombia due to the recent attempts of usurpation of functions by ONAC.</p> <p>Regarding the second paragraph:</p> <p>If the VVB becomes aware of an unsolicited and approved deviation, this is reported in the verification report as a request for clarification or procedural revision and does not need to be indicated here, unless a policy of unilateral determination of appropriateness is made by the VVB, which would reinforce the need to limit or circumscribe such decisions by specific standards or criteria to ensure their correct applicability with respect to the Cercarbono philosophy. P 31.</p>		
76	<p>Bullet list says: "- Justification as to why the proposed CCMP is considered additional."</p> <p>Comment:</p> <p>It is recommended to add it to read "- Justification why the proposed CCMP is considered as eligible and additional.", as the two conditions must be fulfilled and are not always synonymous. ISO 14064-2 does not mention additionality as it is not oriented to certification, but to validation and verification.</p> <p>This Comment is not oriented towards methodological eligibility, but towards eligibility to participate in the Cercarbono programme.</p> <p>Most CCMPs already include the above. P 33.</p>	6.1 Components of the CCMP	A footnote is added in line with the Comment.
77	<p>List of bullets says: "- CCMP location and limits..."</p> <p>Comment:</p> <p>It is considered appropriate to request that they be represented both graphically and narratively. In the case of the location, this is always the case, but in the case of the limits, it has generally been observed that they are only narrated, without including an explanatory diagram or figure, and there is often confusion when revising or even when drawing up the CCMP, given that the drawing of clear limits is fundamental for the rest of the development of the PDD. There are occasions when the diagram would have been found to be flawed at source, which then leads to unnecessary revisions, consultations, expense, and use of resources because the proponent did not have a clear idea of the context of the project.</p>	6.1 Components of the CCMP	The text is adjusted in accordance with the comment.

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	In complex projects, this is even more important. If desired, one could indicate the desirability of including the boundary diagram graphically as an option, on the grounds that it will facilitate the review to be included. P 33.		
78	<p>The requirements do not include environmental impact, as referred to in ISO 14064-2</p> <p>Comment:</p> <p>Although not necessary in many cases, an analogue to this is the documentation and description of the CCMP contribution to the SDGs, which is even part of the Cercarbono template, so it is suggested to include it as the last bullet, with the connotation "if applicable", or similar. P 33.</p>	6.1 Components of the CCMP	The text is adjusted in accordance with the comment.
79	<p>It states: "- from carbon certification standards or schemes that are consistent with this Protocol, if their use is free or authorised by such standards or programmes."</p> <p>Comment:</p> <p>It is recommended to consider adding "after consultation and confirmation by Cercarbono", or indicate which ones it refers to, as here the door would be left open by not presenting a list or reference of the standards or programmes in line, to the development of PDDs that might not be in line with the above, with expense, time and hassle incurred, as they are given the same status as those of the CDM, for example.</p> <p>An alternative action would be to remove this point, as it is apparently covered in the paragraph below in this section which says: "Any methodology, method, module or tool that is not on the list but meets the above characteristics can be put forward for consideration by the Cercarbono certification programme upon request to info@cercarbono.com." P 34-35.</p>	6.2 Description of the methodology	The text is adjusted in accordance with the comment.
80	<p>Penultimate bullet item: "...manufacturing or production systems outside the limit of the CCMP ..."</p> <p>Comment:</p> <p>It is suggested to change to "...manufacturing or production systems outside the CCMP limit. ...", due to the fact that it is generally used in the plural to refer to them, and that it is used in most of the references, while "limit" is preferably used to refer to other aspects. P37-38.</p>	6.2.5 Establishing the project scenario	The text is adjusted in accordance with the comment.
81	<p>Penultimate paragraph, says: "The MCC..."</p> <p>Comment:</p> <p>Should be "The CCMP..." P37-38.</p>	6.2.5 Establishing the project scenario	The text is adjusted in accordance with the comment.

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82	<p>Tabla 2. (General)</p> <p>Comentario:</p> <p>The line dividing the columns " CH₄ and N₂O " in the project scenario is thicker than the rest, which may cause confusion. It is recommended to standardise the width or use a wider line to divide the baseline scenario from the project scenario, and the project scenario from leakage. P38-40.</p>	6.2.6 Identification of GHG emission sources	This issue was addressed on Table 2.
83	<p>Table 2. Industry (Eve)</p> <p>Comment:</p> <p>It is indicated that Yes should consider CH₄ in baseline emissions, and No should consider N₂O, but "Dp" would be better in both, as not in all GHG avoidance actions in industry, mining or mineral production there is presence of methane in baseline, while for other actions, as in the case of those applicable to nitric acid plants, it is precisely N₂O that is reduced. P38-40.</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
84	<p>Table 2. Mining and mineral production (DespG--ER)</p> <p>Comment:</p> <p>It is indicated that Yes CH₄ should be considered in baseline emissions, but "Dp" would be better, as not in all displacement actions of more intensive GHG production in mining or mineral production there is presence of CH₄ in baseline. P38-40</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
85	<p>Table 2. Fugitive emissions (CCMP)</p> <p>Comment:</p> <p>In general, CCMP is not a mechanism for reducing fugitive emissions. P38-40.</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
86	<p>Table 2. Fugitive emissions (Eve)</p> <p>Comment:</p> <p>It is indicated that Yes CO₂ should be considered in baseline emissions, but "Dp" would be better, as most of the actions under this heading are oriented to CH₄, and only in specific cases to fugitive CO₂ emissions. P38-40.</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
87	<p>Table 2. Fugitive emissions (DestG)</p> <p>Comment:</p> <p>CH₄ is left out, being that it is the main GHG to destroy to reduce fugitive emissions, and flaring efficiency indicates the degree of destruction, so for CH₄, it should be changed from "No" to "Yes". P38-40</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
88	<p>Table 2. Fugitive emissions (DespG -EBC)</p> <p>Comment:</p> <p>In general, DespG - EBC is not a mechanism for fugitive emission reduction. P38-40.</p>	6.2.6 Identification of GHG emission sources	The text in Table 2 is adjusted in accordance with the comment.
89	<p>Item: "For CCMP of EE:"</p> <p>Comment:</p> <p>The second paragraph, referring to the project scenario, does not describe EE measures, but CCMP</p>	6.2.6.4 Transport sector	The text is adjusted in accordance with the comment.

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	measures and is a sub-case of the corresponding one in CCMP. Adapt to the reduction mechanism. P 44.		
90	Item: "For CCMP of CCMP:" Comment: The second paragraph, referring to the project scenario, infers that fuel switching is linked to feedstock switching, which is not always true, as they can be separate actions. Adjust to avoid such a direct inference. P 45.	6.2.6.5 Mining and Mineral Production Sector	The text is adjusted in accordance with the comment.
91	Item: "For DestG CCMP:" Comment: The first paragraph, as well as the second, mentions CH ₄ emissions in the baseline and project scenarios due to release from operating mines and geological structures. The above generally does not occur in this industry, and even the IPCC guidelines (Vol.3, Section 2, Ch. 2, Minerals Industries) indicate that they are negligible and are not considered. Thus, since it is indicated that CH ₄ can be used for power generation in the project scenario, it refers to coal mines. However, this part of the minerals industry in particular is dealt with in the IPCC fugitive emissions chapter under a specific section (Vol 2, Chapter 4, Section 4.1). It is recommended to consider where it is more appropriate to include the case of methane in deposits and mines, and to adjust the source table accordingly (removing methane in baseline and project if justified). P 45.	6.2.6.5 Mining and Mineral Production Sector	The text is adjusted in accordance with the comment.
92	Item: "For CCMP of EE:" Comment: The description of the project scenario in the second paragraph includes the use of less polluting materials, which corresponds to CCMP and not to EE.	6.2.6.6 Metal production sector	The text is adjusted in accordance with the comment.
93	Item: "For CCMP of CCMP:" Comment: The project scenario description in the second paragraph refers exclusively to switching from fossil fuel to charcoal, when there are multiple options for less carbon intensive fuels. It is suggested to leave open or give charcoal as an example, although the same is mentioned in the DespG (ER) CCMP and should only be in one of the mechanisms for each sector. P 46.	6.2.6.6 Metal production sector	The text is adjusted in accordance with the comment.
94	Item: "For Eve's CCMP:", reads: "...mineral production processes." Comment: Should state "...metal production processes." P 46.	6.2.6.6 Metal production sector	The text is adjusted in accordance with the comment.

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95	Item: " For CCMP of DespG (ER):" Comment: It is limited to one industrial process and one measure only, is it correct or should it be opened up further? P 46	6.2.6.6 Metal production sector	The text is adjusted in accordance with the comment.
96	Item: "For CCMP of CCMP:" Comment: It is confined to associated gas and oilfield use, whereas IPCC includes coal mining as a source of these emissions in the first place. It is recommended to consider reclassification between sectors, if applicable. P 46-48.	6.2.6.7 Fugitive emissions sector	This mitigation activity in this sector has been removed in accordance with the storyline.
97	Comment: The second paragraph indicates the consideration of CO ₂ emissions from energy consumption and fossil fuel burning, being that in these projects, only non-energy fossil fuel burning is considered and emissions of both CO ₂ (if any), and preponderantly CH ₄ are only considered to account for such emissions in case it is non-energy burning in teas. No relationship with CCMP is observed as there is no description of scenarios. P 46-48.	6.2.6.7 Fugitive emissions sector	See reply to previous comment (No. 96).
98	General Comment: Continually refers to "emissions from fossil fuel and natural gas use", when unless flaring is involved, fuel use is only analysed from the point of view of fugitive emissions in fuel transport and distribution systems, so emissions from flaring for energy purposes are irrelevant for this type of project. Leakage reduction is treated as a different project from the above when it is not. It is recommended to revise the whole section to make the definitions consistent with the concepts and mechanisms generally referred to fugitive emissions, as it may cause confusion as it stands. As indicated in the comments to Table 2, the MPCC and DespG (EBC) mechanisms are not used for fugitive emission reduction projects. The scenario descriptions in those cases do not correspond to the type of mechanisms being considered either.	6.2.6.7 Fugitive emissions sector	The text is adjusted in accordance with the comment.
99	Item: "For DestG CCMP:" Comment: It is suggested to remove "animals" from the wording "management of animal waste or faeces that are captured, destroyed or used as an energy source.", as it is previously not mentioned and because of the wording, malicious interpretations of animal capture could appear requiring explanations not otherwise necessary to be given.	6.2.6.9 Land use sector	The text is adjusted in accordance with the comment.

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100	General Comment: Refer that the monitoring methods and procedures should be consistent with the baseline and monitoring methodology(ies) used for the development of the CCMP and the elaboration of the PDD, as there is no mention of the methodologies in this section, being the main source of such procedures and methods.	6.2.8 Selection of emission sources and carbon pools for monitoring or estimation of GHG emissions and removals	The text is adjusted in accordance with the comment.
101	General Comment: Redundant with sections 5.3 and 5.4. Suggested deletion or full transcription, if justified.	6.2.12 Methodological revisions and deviations	The text is adjusted in accordance with the comment.
102	General Comment: It is advisable to clarify the meaning of the power to use different methodologies in this type of project, in order to avoid cases where parts or calculation and/or monitoring methods of several methodologies are used for the same project activity, which is not acceptable.	6.4 Grouped projects	The text is adjusted in accordance with the comment.
103	First paragraph, it says: "Cercarbono has established on its website in the section: About us three areas that are key to effective communication...". Comment: It is suggested to modify to read: "Cercarbono has established on its website in the "About Us" section, three spaces that are key to effective communication..."	6.8.4 frequently asked questions, contact and requests, complaints, and claims	The text is adjusted in accordance with the comment.
104	Figure 3. Comment: Assess the convenience of changing either the shade of shading or the colour of the text in the title boxes in this figure, as in some cases the chosen combination makes it difficult to read (Stage, Process, and Responsible).	8.1 Formulation	Changes were made to Figure 3 in accordance with the comment.
105	The last paragraph mentions that: "In a CCMP, the baseline scenario should be updated upon completion of the accreditation period, when re-validation is required or...". Comment: It appears that the first case of updating refers to a project to be renewed, unless Cercarbono requires such a scenario to be updated effectively upon completion of the period, although the former does not seem useful. It is recommended to review in a justifiable case.	8.2.3.4 Selection of the baseline scenario	The text is adjusted in accordance with the comment.
106	Figure 4. Comment: Improve image quality, it is blurred, which is not the case with the rest of the figures.	10 Migration of CCMP from other standards or	Image quality was improved.

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		certification programmes	
107	Comment: Attention - In additionality tool section 3.1 - Annex 1. It is understood that there continues to be the possibility that a project to be certified in CERCARBON, may choose to apply the own concept of additionality, in accordance with Resolution 1447 of 2018 of the Ministry of Environment and Sustainable Development. Provided that the project, if and only if, decides to commercialise its CARBONCERS under the mechanism of not charging the national carbon tax in Colombia, it is not clear if this practice continues or if the applicability of the additionality different to that established in Resolution 1447 will be mandatory.	2.2 Principles considered in carbon credits	This has been corrected in line with the updated tool. The national context is removed from its reach.
108	Comment: Are fugitive emission projects from hydrocarbon production still eligible? Taking into consideration that there is already a regulation that obliges them to make use of this waste?	4.2.7 Fugitive emissions sector	In the Colombian context, the implementation of this sector has undergone some changes, but it can still be considered, as in the international context.
109	Comment: It is not clear what happens to projects that want to enter the grouped Project, but their operational start date was before the operational start date of the grouped project? Would this project be eligible to enter the grouped project and be able to claim CARBONCERS from the second verification, irrespective of whether its start date was before the start date of the grouped project?	6.4 Grouped projects	A project cannot become part of another project. If the comment refers to areas or participants, the protocol states that <i>"The start of activities of each instance of implementation can be retroactive to the date of the previous verification of the project, starting from the second verification."</i>
110	Comment: "The baseline and project scenarios need to be updated to include the effect of both on the project. Can this new baseline determination affect the baseline of projects already in operation?"	6.4 Grouped projects	It does affect it, as far as new areas become part of the CCMP. In that sense, both removals/reductions in both scenarios will be affected. It is also possible that new land uses may appear in the baseline scenario that were not present in the previous scenarios. For clarification, the text mentions that <i>"...it is not necessary to recalculate for the implementation instances that were already in operation."</i>
111	Comment: Caution - it is not clear how this retroactivity could be affected by eligibility criteria of methodologies,	6.10 Retroactivity period	The text of the document was adjusted for clarity.

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	as we are aware of methodologies that condition start dates and retroactivity. Make it clear which criterion is a priority for Cercarbono, the one established by the standard/protocol or the one established in the methodologies?		Retroactivity is defined by the programme.
112	Comment: It is implied that the on-site visit for the validation of a project is not mandatory. Be clearer.	8.3.9.2 Circumstances requiring a visit to the site, area, or facility	The comment was made in the verification section. However, the comment is accepted, and the text is adjusted in the corresponding section (validation).
113	Comment: Today in the country there is a situation in which various forest plantation owners grouped together in a project by a developer through an "Umbrella" scheme and want to withdraw from the project to which they belong, seeking conditions of transparency, as the developer repeatedly fails to comply with the commitments made. Section 10 of version 4 of the protocol establishes the requirements for CCMP migration from other standards or certification programmes. However, there are no instructions for the migration of participants, either from another programme or even from the same programme from one project to another.	10 Migration of CCMP from other standards or certification programmes	Adjusting our regulatory framework to address these circumstances is complex and depends on actions by the standards or programmes from which migration would occur. Similarly, it would be necessary to adjust our procedures should participants in Cercarbono registered projects decide to migrate individually.
114	Comment: The protocol mentions the materiality threshold for Validation/Verification processes. Therefore, could they consider and define a threshold or acceptable margin of sampling error obtained in the CCMP carbon monitoring. Or will this percentage be defined independently by each CCMP?	8.2.1 Actions prior to validation and verification processes	The acceptable margin of sampling error should be defined independently by each CCMP as determined by the applicable methodology.
115	Comment: Refer to the Framework Convention on Climate Change and the principles of the climate change agreement.	ND*	The text is adjusted in accordance with the comment.
116	Comment: Clarification on the use of sensitive and/or confidential information.	ND*	This is detailed in the Procedures of Cercarbono's Certification Programme .
117 a	Comment: Inclusion of a new category of Programme of Activities in which a coordinating entity is allowed to manage project activities independently, allowing the inclusion of new activities (according to a list of eligibility requirements) during the whole crediting period of the programme and without cross implications (design changes, modifications of monitoring plans, etc.) between the different project activities. The objective is to facilitate and		The text is adjusted in accordance with the comment.

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	streamline the process of registration and validation of Project Activities in line with the existing POA figure in CDM.		
117 b	The possibility of multi-country programmes to facilitate the transfer of technology and knowledge is also proposed.		We understand its importance. This possibility is being analysed for a future version of our regulatory framework. Its inclusion is not possible in the short term due to the required changes to the registration platform, credit serials and numerous templates and regulatory documents.
117 c	It is proposed to include a possibility of retroactivity for compliance with the project start rule from 2016, in line with frequent practice in other carbon markets.		The text is adjusted in accordance with the comment.
118	Comment: Clarification on the concept of "intentional error": neither the concept (manipulation of data, use of factors not corresponding to the calculation, omission of information...) nor the process for the demonstration of intentionality of the error (e.g., a transcription error, a miscalculation, an undelivered annex) is clear.	ND*	The word "intentional" is deleted because of the difficulty in proving it.
119	Comment: Clarification on methodological deviations; given that it leaves wide open the possibility for "intentional errors" to be rectified, thus generating a gap that may increase uncertainty in the reliability of the project.	5.4 Request for methodological deviations	The text is adjusted in accordance with the comment.
120	Comment: Clarification and more detail on the Migration from other standards process.	10 Migration of CCMP from other standards or certification programmes	More information on this aspect is detailed in the document <i>Procedures of Cercarbono's Certification Programme</i> .

* Section not determined.