



## Public Comment

# VCS Methodology – Improved Forest Management – Logged to Protected Forest (IFM-LtPF) on Fee Simple Forested Properties

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Thank you very much for the opportunity to comment on this methodology.

### *Section 2.2 Procedure for the selection of the most plausible baseline scenario*

Methodology provides only suggestive procedures to assess the baseline harvesting rather than providing specific step by step guidance that includes the requirements for documentation of historical harvesting and assessment of common practice harvesting in similar areas . It appears that the lack of specification in the procedures makes the baseline selection and quantification ambiguous and open to individualized interpretation. For e.g., “typical harvest level practice”, “market capacity”, “operational feasibility” and “financial indicators” are subjective phrase and their interpretations vary depending on individual perspectives. The methodology will benefit by standardizing the definition of these terms and providing requirements for documentation of the harvesting that would have occurred under the baseline scenario. For example – “typical harvest” is harvest in past X years in similar forest types, stand density and climate and within certain geographic boundary. Similarly, simply stating assessment of “market capacity” is confusing as market capacity does not remain static for a longer period of time (the market capacity might change) and fluctuates with economic conditions of a country at large. Therefore, it would be appropriate to list out criteria (preferably with numerical thresholds) for six considerations mentioned on Page 7. And procedures should be added for how changes in these criteria would require a resetting of the baseline.

Same “quantitative” criteria as described above must be provided in procedure to quantify secondary leakage in section 2.6.