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TABLE FOR COMMENTS

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0	1	2	3	4	5	6
#	**Para No./ Annex / Figure / Table**	**Line Number**	**Type of comment** **ge** = general **te** = technical **ed** = editorial	**Comment** **(including justification for change)**	**Proposed change** **(including proposed text)**	**Assessment of comment** ***(to be completed by UNFCCC secretariat)***
1	**17 ff.**		**te**	Further initiatives that might be mentioned are: - Global Research Alliance on Agricultural Greenhouse Gases (http://globalresearchalliance.org/) - The Mitigation of Climate Change in Agriculture Programme (MICCA) of the FAO (http://www.fao.org/climatechange/micca/en/) - The CGIAR Research Program on Climate Change, Agriculture and Food Security (CCAFS) (https://ccafs.cgiar.org/) - Coalition on Agricultural Greenhouse Gases C-AGG (http://c-agg.org/)	Include one or more paragraphs for each of the mentioned initiatives in the document. All of them provide valuable information and reflections on methodologies, procedures, MRV and project implementation.	
2	**Table 3**	**Last row**	**te**	The Colorado State University developed also a farm GHG balance tool called Comet-VR (http://www.cometvr.colostate.edu/). It has probably been developed with a focus to the USA but can be adapted to other countries which is currently done for Switzerland.	Include an additional row for Comet VR.	

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3	**25 / Table 4**		**te**	Further Standards and reflections on standards are: - Driver, K., Haugen-Kozyra, K., Janzen, R. 2010: Agriculture Sector Greenhouse Gas Practices and Quantification Review: Review: Phase 1 Market Mechanisms for Agricultural Greenhouse Gases (M-AGG): 52. - Olander, L., Reed, D., Malin, D., Haugen-Kozyra, K. 2011: C-AGG, T-AGG and M-AGG: A model for building collaborative actions and common understanding on agricultural GHG mitigation. Working Paper No. 3. Climate Change Agriculture and Food Security (CCAFS). Copenhagen; Denmark. - C-AGG 2010: Carbon and Agriculture: Getting Measurable Results. Coalition on Agricultural Greenhouse Gases. - Alberta Environment, Climate Change Secretariat 2010: Quantification protocol for agricultural nitrous oxide emissions reductions. Specified gas emitters regulation. Government of Alberta. Edmonton, Canada. - The « Centre Interprofessionnel Technique d'Etudes de la Pollution Atmosphérique, CITEPA » in France holds also some standards and methodological descriptions on e.g. reduction of enteric fermentation by feeding linseeds (Méthodologie spécifique aux projets de réduction des émissions de méthane d'origine digestive par l'alimentation des ruminants laitiers) or on abatement of N_2O emissions by increased use of leguminous plant species (Méthodologie spécifique aux projets de réduction des émissions de N2O dues à la dénitrification des sols agricoles par l'insertion de légumineuses dans les rotations agricoles). Notably, these initiatives are among the few I know of that are officially accredited by a national governmental entity and used within an official carbon trading scheme. The results of the respective programs are reflected in the national inventory and are thus also ratified in a way by the UNFCCC.	Include the mentioned programs in the list in § 25 and elaborate on the main findings in the text and/or in table 4.	

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4	28		ge	Demand side measures are not mentioned here. Is it thinkable that CDM-projects could be developed in this area (e.g. programs that can demonstrate reduced consumption of animal product in a certain region / population stratum)? The advantage of such programs are that they are additional and very effective (no leakage) and provide additional co-benefits.	Include a paragraph on the need to further elaborate a methodological basis for demand side measures. If demand side measures are excluded per se from CDM, then provide a clear explanation why.	

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5	(29) general		ge	The problems of "Additionality", "Leakage" and MRV are not covered extensively (or not at all) in the document, although they are of crucial importance for the development of CDM-projects. **Additionality**: What means additionality in the context of agricultural CDM projects? One pertinent question here is, whether projects that are based on consultation services can be considered additional when the actual measure is not additional in the proper sense. This is e. g. often the case when consultation leads to better fertilizer efficiency and thus reduced N-input and N_2O emissions. The reduction of fertilizer use would be actually cost efficient for the farmer but would not take place without the consultation due to ignorance. **Leakage**: A common problem found in agricultural mitigation projects are possible yield reductions (and hence compensating production elsewhere with more or less GHG emissions). How should this problem be dealt with? On the one hand, total global food demand (with the global composition of the food basket) request ever more land for agriculture and leads thus to deforestation and land use change with associated carbon emissions. Here, yield reduction in a project area would lead to higher emissions elsewhere. On the other hand, there is currently enough agricultural land to feed the world when food waste would be reduced and diets would include less animal products (→ change of the food basket). It could thus be argued, that the problem of leakage due to lower yields is not within the scope of a CDM-Project. Additionally the long term perspective is often neglected. A mitigation project might lead to lower yields in the present. However, this yield level might be sustained longer than under the original management regime that could e. g. lead to an exhaustive exploitation of the soil resources. **MRV**: Most agricultural carbon offset projects suffer the problem of prohibitive MRV-restrictions and –costs. Various solutions are discussed such as standardized MRV-frameworks, discount rates for carbon credits to deal with uncertainties or temporal issuance of carbon credits.	Add additional paragraphs on Additionality, Leakage and MRV as the most important barriers for the implementation of agricultural CDM (or other offset mechanisms) can be found in these areas.	

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6	**Appendix 2(b)**		**te**	…"although quantitative estimates of the potential are few and highly uncertain." This statement probably refers to the statement in the last IPCC Assessment Report. While it is true that there are few quantitative estimates (compared to quantitative estimates on the supply side) it cannot be said, that the potential is highly uncertain. In fact intuitively it should be clear, that a demand side measure that leads to the reduction of food waste or the reduction of livestock numbers immediately leads to less emissions. The uncertainty may be related to the possible implementation i.e. to the likelihood consumers will change their behavior. But then this argument will hold equally true for the producers that would have to change their behavior. In fact uncertainty is much higher for supply side measures due to measurement uncertainty, interlinked processes, leakage and pollution swapping. A cow could maybe be fed in a way that it produces less methane but it certainly won't produce any methane when it is replaced by a vegetarian protein source.	Either delete "*although quantitative estimates of the potential are few and highly uncertain*" or clearly indicate that this statement is the statement of the IPCC 5AR and at the same time relativize the statement.	