GLOBAL STAKEHOLDER CONSULTATION FORM FOR PROPOSED NEW BASELINE AND MONITORING METHODOLOGY OR METHODOLOGICAL TOOL
(version 01.0)

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Based on an assessment of information in the A6.4-FORM-METH-002 and its application in sections A to C of the submitted draft project design document (A6.4-FORM-AC-020), provide your comments to the proposed new methodology using the tabular format below. Please indicate the sections or issues to which your comments refer to.	
Date received by the secretariat	

#	Section / Para no./ Annex / Figure / Table	Type of comment **ge** = general **te** = technical **ed** = editorial	Comment (including justification for change)	Proposed change (including proposed text)
1	Summary (Establish HRP) and 10.2.2, point 30(a)	**te**	The Summary states the HRP must “cover at least 2 times the Mean Fire Return Interval (FRI) and a maximum of 4 times FRI or 20 years (whichever is smallest).” Section 10.2.2 (point 30a) codifies this same restrictive language as the binding calculation rule. This creates a direct mathematical impossibility. When FRI >10 years, the “at least 2×FRI” requirement (example: 24 years for FRI=12) is immediately negated by the “maximum 20 years (smallest)” clause, making it impossible for projects in these ecosystems to comply with the stated 2×FRI representativeness standard. The methodology thus forces the use of an HRP that captures only 1.67 fire cycles for miombo woodlands (FRI 12-15 years) and 1.33 cycles for dry savannas (FRI 15 years), which is statistically inadequate to characterize the fire regime distribution.	Replace the binding language in Section 10.2.2, point 30(a) with: “The Historical Reference Period must include a minimum of 7 years and shall extend to cover at least 2 times the Mean Fire Return Interval (FRI), up to a maximum of 4 times FRI. The 20-year cap is removed for ecosystems where 2×FRI exceeds 20 years, provided the proponent demonstrates that the extended HRP maintains data consistency and quality.” Update the Summary to match this unambiguous rule, ensuring consistent language across all sections.

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2	Summary (Create and Validate Vegetation Fuel Type Map) and Appendix 2, Section 1.1 and 1.2	**te**	The methodology requires a Vegetation Fuel Type (VFT) map "validated to ensure accuracy (80% or greater)" using a simple global accuracy metric (total correct / total points). This approach fails to account for class-specific error distribution, which is critical in savanna carbon accounting where fuel loads vary significantly (e.g., Woody Savanna fuel loads can be 3-5× higher than Open Savanna). Under the current 80% global accuracy rule, a project could inadvertently or deliberately over-map high-fuel classes (Commission Error), misclassifying low-fuel Open Savanna as high-fuel Woody Savanna. As long as the dominant classes are mapped correctly, the map could still pass the 80% threshold. This would result in inflated baseline emissions (calculating 10 t/ha where only 2 t/ha exists), leading to over crediting. Conversely, under-mapping high-fuel classes (Omission Error) would systematically underestimate the project's mitigation potential. Best practice in Remote sensing explicitly considers that overall accuracy cannot be used as a proxy for the accuracy of individual classes, especially when classes have widely different carbon implications. To prevent ambiguity and ensure robustness, the methodology must require Producer's Accuracy (to limit omission) and User's Accuracy (to limit commission/inflation) for each individual VFT class, weighted by its emission contribution. Relying on ground truthing for calibration does not fix this, as the validation step determines whether the final map applied to millions of pixels, is statistically valid for carbon accounting.	Replace the 80% blanket accuracy requirement in Appendix 2, Section 1.1 with a class-specific performance standard: "The Vegetation Fuel Type map must demonstrate sufficient accuracy for each eligible VFT class to ensure robust emission quantification. The validation report shall provide a full confusion matrix and meet the following criteria: i. Producer's Accuracy and User's Accuracy ≥80% for every eligible VFT class that contributes >10% to the total project area fuel load. ii. For classes with <10% fuel load contribution, a minimum accuracy of 70% is required. This threshold acknowledges the practical difficulty in mapping spatially rare or highly fragmented classes. A lower accuracy for minor classes is acceptable under the principle of materiality, provided that the higher accuracy in key classes ensures the overall project uncertainty remains within acceptable bounds, consistent with IPCC good practice guidance on prioritizing key categories. iii. Where these thresholds are not met, the uncertainty associated with VFT misclassification must be explicitly quantified using a stratified estimator and deducted from net emission reductions. Overall map accuracy shall not be used as the sole metric for validation."

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3	Section 10.2.2(f)(iii-iv)	**te**	The methodology defines the Start of EDS and End of LDS based on fixed rainfall thresholds (e.g., “no significant rainfall,” “start of rainy/wet season,” “wettest 8-week period”). This proxy approach ignores the primary drivers of fire behaviour and emissions: fuel moisture content and Vapor Pressure Deficit (VPD). In many savannas, fuels remain cured and flammable well after the first rains (the “green-up” lag), meaning high-intensity fires can occur in what the methodology classifies as the “Wet Season” (ineligible for crediting). Conversely, in drought years, LDS conditions (high flammability) can begin months before the historical “Start of LDS” date determined by rainfall climatology. Relying solely on rainfall rather than direct fuel moisture or fire danger indices (e.g., FWI, KBDI) creates a mismatch between the credited period and the actual high-emission fire season. For example, a high-intensity fire occurring in a dry spell within the “Wet Season” (defined by rainfall) would be excluded from the baseline, suppressing the baseline value. More critically, fires occurring in the defined “EDS” period during a drought year might burn with “LDS” intensity due to accelerated curing, yet be credited using lower EDS emission factors, resulting in over-estimation of emission reductions. Best practice in fire management uses dynamic, fuel-state-based seasonality definitions to align accounting with physical reality.	The Start of EDS, End of EDS and End of LDS shall be determined annually using a validated Fire Weather Index (FWI) or direct Fuel Moisture Content (FMC) threshold derived from remote sensing (e.g., VIIRS/MODIS derived relative greenness or KBDI). Fixed rainfall dates may only be used as a fallback where meteorological data is unavailable and must be validated against historical fire radiative power (FRP) data to demonstrate alignment with high-intensity fire periods.

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4	Section 5(a) (Eligible ecosystems) and Figure 5 (Savanna Boundary Shapefile)	**te**	The methodology requires that projects be located within “woody savanna ecosystems that fall within the envelope of globally applicable savannas,” and operationalizes this via an indicative Savanna Boundary Shapefile derived from MODIS MCD12Q1 (classes 6-10) intersected with ERA5 rainfall thresholds (Figure 5). This approach is appropriate for global screening, but it is not robust enough to serve as a *de facto* eligibility filter at project scale. First, MODIS MCD12Q1 at 500 m resolution is known to struggle in heterogeneous mosaics where woody savanna, cropland and shrubland are interspersed. Class confusion between woody savanna, grassland and cropland is a documented issue in African and South American savannas. This means that some genuinely woody savanna areas will be excluded (false negatives) while some non-woody or heavily modified areas (cropland-grassland mosaics) may be included (false positives). Second, the rainfall-based filtering using ERA5 introduces additional uncertainty: ERA5 rainfall biases of 10-20% in convective regions are well documented, especially in tropical Africa and Brazil, which affects the identification of extended dry season areas near the 10% MAR-W threshold. At project scales (10,000-500,000 ha), these classification and climate data errors are no longer negligible. A project located at the margin of the global savanna boundary could be declared ineligible despite on-the-ground evidence (national vegetation maps, inventory plots) clearly showing woody savanna structure or conversely, a project in a degraded agro-pastoral mosaic could be admitted solely because the coarse global shapefile flags it as savanna. Relying on this shapefile as more than an indicative tool risks both exclusion of valid mitigation opportunities and inclusion of ecologically inappropriate areas, undermining the ecological coherence the methodology aims to enforce.	Replace in Section 5(a) with: Projects must be located within woody savanna ecosystems, as demonstrated primarily by project-scale evidence (national or regional vegetation maps, field plots, canopy cover and structure metrics and fire history). The Savanna Boundary Shapefile provided with the methodology is indicative only and shall be used as an initial screening tool, not as a definitive eligibility gate. Where the project area lies partially outside the indicative boundary but project-scale evidence demonstrates woody savanna structure and fire-prone fuel characteristics consistent with the methodology’s scope, the project may still be deemed eligible. Conversely, where the shapefile includes areas that national land-cover data or field evidence indicate are predominantly cropland, grassland without woody structure or other ineligible land covers, such areas shall be excluded from the eligible project area.

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5	Section 9.3.1	**te**	The methodology's default reliance on Investment Analysis is scientifically inappropriate for Savanna Fire Management (SFM) projects. SFM inherently requires both upfront capital expenditure and substantial, recurring operational expenditure, yet it produces no conventional market revenue. Because Investment Analysis frameworks are designed for commercial ventures with predictable revenue streams, applying them to a net-cost public-good service like SFM leads to distorted results. First, Investment Analysis improperly blends large annual OPEX with initial CAPEX, obscuring the project's true financial profile and long-term cost structure. Second, the only financial returns for SFM are carbon revenue and avoided non-market costs. Investment Analysis requires a market-based hurdle rate to determine viability, but no such benchmark exists for prescribed burning or culturally mandated fire management. This makes the financial viability test subjective, unverifiable and inconsistent with the methodology's requirement. Since prescribed burning is not a traded commodity and has no comparable market rate of return, the benchmark comparison becomes impossible to perform in practice. Consequently, the mismatch between the Investment Analysis framework and the reality of SFM leads to systematic false positives: projects appear financially non-viable on paper and therefore additional, even though the activity is a low-margin, essential land-management obligation that would occur if adequate public or donor funding were available or is simply customary practice.	The methodology's default financial test should be replaced with 1) A Simple Net Cost Assessment, demonstrating the financial barrier assessment, requiring proponents to demonstrate that the project is a net-cost activity by showing that total average annual costs (combining amortized CAPEX with recurring OPEX) exceed any minimal non-carbon revenues, such as negligible timber sales. This establishes that carbon finance is genuinely needed to bridge a financial gap. 2) A Constrained Barrier Analysis should be used to assess systemic constraints, applied only once net-cost status is confirmed. This step requires proponents to provide objective, auditable and verifiable evidence of non-financial barriers that prevent the activity from being undertaken as common practice. Such barriers must include documented institutional or policy constraints such as legal or administrative mandates that prioritize late-dry-season (LDS) suppression over planned early-dry-season (EDS) burning and documented capacity or coordination barriers such as failures in existing governance or community systems due to inadequate coordination, training, or sustained funding.

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6	Section 9.3.3	**te**	The methodology defines a ≥50% prevalence threshold for systematic Early Dry Season (EDS) burning and allows the use of either national or subnational geographic boundaries, but it does not specify objective rules for how this boundary should be selected. In practice, this creates scope for selective boundary choice: for example, in a hypothetical country like Zambia, the national savanna zone might show that more than 50% of eligible woody savanna is already under government or community EDS programs (which would cause the project to fail the common practice test), while a narrower subnational unit (e.g., a single district with limited program coverage) could be chosen where prevalence is only 10%, allowing the same project configuration to pass. The current temporal window of “five most recent years or the HRP, if longer” is also shorter than the typical fire-return interval in many savannas, which is often in the range of 3-7 years. This means that a period of temporary fire suppression or policy-driven change (for example, a short-lived ban on burning that expired recently) could be interpreted as evidence that EDS burning is not common practice, even in landscapes where EDS burning has been frequent over previous decades. In addition, the focus on “documented, planned programs” at government or private/communal level risks overlooking systematic but undocumented customary burning by Indigenous and local communities, which is well established in African and South American savannas. Without explicit consideration of such customary practice, there is a material risk of crediting activities that replicate long-standing local fire management rather than introducing genuinely new practice	Revise Section 9.3.3 as follows: a) The default comparison region shall be the national savanna zone (as defined in Section 5) or the host-country fire management district in which the project area is located, plus any directly adjacent districts with similar ecological and policy conditions. Use of a smaller subnational unit as the sole comparison region shall only be permitted where the proponent demonstrates, with quantitative evidence (e.g., rainfall patterns, vegetation structure, legal frameworks), that fire management conditions in that unit are materially different from the broader national savanna zone. b) The analysis shall cover at least 10 consecutive years prior to the Project Start Date or two times the mean fire-return interval for the project region (whichever is longer), using consistent satellite-derived fire history to assess the prevalence of EDS versus LDS burning. c) For the purposes of common practice, systematic EDS burning includes both formal (documented, planned) programmes and customary, locally organized burning where satellite fire history shows recurring EDS fire patterns over the defined temporal window. Where such customary EDS burning is evident over ≥50% of the eligible woody savanna area in the comparison region, the activity shall be considered common practice and the proponent must demonstrate that project activities go beyond this existing practice in scale, organization or outcomes.

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7	Section 10.3	**te**	The methodology mandates a dynamic annual reduction rate composed of multiple variable factors: (i) external funding amounts, (ii) unburnt area metrics and (iii) evolving Host Party NDC ambition. This structure introduces systemic revenue unpredictability that is incompatible with project finance requirements for Savanna Fire Management (SFM). First, tying baseline reduction to future external funding (which is unknown at validation) prevents reliable cash flow forecasting. Second, linking the rate to an ecological metric (unburnt area) exposes revenue to high inter-annual volatility driven by rainfall and weather, rather than management performance. Third, exposure to mid-period policy shifts (NDC updates) adds sovereign risk that cannot be hedged. Unlike commercial projects with fixed outputs, SFM relies entirely on carbon revenue to cover OPEX. A dynamic, ex-post calculated reduction rate destroys the certainty of projected cash flows required for loan approval (debt service coverage), effectively making the methodology unbankable for high-quality projects.	Replace the dynamic ex-post reduction rate with a fixed, conservative ex-ante decline rate: The annual baseline reduction rate shall be a fixed percentage determined at validation (e.g., 1.5% per annum) to reflect expected ambition and technology improvement over the crediting period. This fixed rate provides revenue certainty for investment. External funding (grants) and NDC updates shall be addressed through periodic checks at verification: if material external funding is received, an equivalent volume of credits shall be deducted from that specific verification vintage, without permanently altering the baseline trajectory. Policy-driven ambition increases shall be incorporated only at crediting-period renewal, ensuring the baseline remains a stable contractual benchmark during the crediting period.
8	Section 10.3	**te**	The methodology calculates the minimum downward adjustment as a fraction (10%) of the projected emission reduction: $BE_{adj,min,y=1} = BE_{HRP,y=1} - (BE_{HRP,y=1} - AE_y) \times 0.1$. While intended to reward realism, this mathematical structure incentivizes proponents to inflate their *ex-ante* Project Emissions (AE_y) in the PDD to secure a higher baseline. By claiming the project will have high emissions (low ambition), the term $BE_{HRP,y=1} - AE_y$ becomes small, minimizing the downward adjustment and maximizing the resulting crediting baseline $BE_{adj,min,y=1}$. The proponent then implements the project efficiently and captures the difference as windfall credits. For example, a proponent expecting PE=20 but declaring AE=80 (sandbagging) secures a baseline of 98 (assuming BE=100) instead of 92, generating 6 extra credits per unit purely through PDD manipulation. This misalignment between reporting incentives (inflate AE_y) and operational reality (minimize PE) undermines the integrity of the ambition adjustment.	The minimum downward adjustment shall be a fixed percentage of the Historical Reference Period baseline rather than a function of variable ex-ante project emissions.

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9	Section 10.4	**te**	Identical to Eq 12, Equation 18 defines the minimum conservative BAU as a function of ex-ante Project Emissions (AE_y). This incentivizes proponents to inflate AE_y to secure a higher (less stringent) BAU floor. A higher AE_y reduces the deduction term, keeping $BAU_{cons, min}$ artificially high.	The minimum conservative BAU should be defined independently of the proponent's AE_y. Replace Eq 18 with a fixed discount factor.
10	Section 10.4	**te**	The methodology lists "Burned Area (FSA)" as a parameter to be "determined ex-post... to reflect actual... variability" for the BAU calculation. This is methodologically impossible for a counterfactual. If the proponent uses the observed burned area from the project year to calculate the BAU, the BAU becomes identical to the Project Scenario, resulting in zero emission reductions. The BAU burned area must be a projected value (e.g., historical average or adjusted by regional control/trends), not the actual observed value in the project area.	Modify the text to state: Burned Area for the BAU scenario shall be determined based on the Historical Reference Period average, optionally adjusted by regional trends observed outside the project area.
11	Section 12.2	**te**	Equation 23 calculates leakage by subtracting the fixed historical mean emissions ($E_{LB,HRP}$) from the monitored annual emissions in the Leakage Belt ($E_{LB,y}$). This approach is statistically flawed for fire-prone ecosystems. Savanna fire emissions are highly correlated with annual rainfall and climate cycles (e.g., ENSO). In a naturally high-fire year (e.g., drought), $E_{LB,y}$ will likely exceed the historical average $E_{LB,HRP}$ purely due to weather, triggering a leakage penalty even if no activity displacement occurred. Conversely, in a wet year, low natural emissions could mask actual leakage. A fixed historical baseline fails to isolate project-induced leakage from natural background variability.	Leakage shall be quantified by comparing emissions in the Leakage Belt $E_{LB,y}$ against a dynamic baseline rather than a fixed historical mean. The dynamic baseline shall be constructed using either: i. A Control Area approach, where the Leakage Belt's deviation is compared to a regional reference area unaffected by the project, or ii. A Climate-adjusted HRP, where the historical baseline is adjusted annually based on the rainfall anomaly or fire weather index of the monitoring year.

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12	Section 12.2	**te**	Paragraph 45(c) restricts leakage accounting to “only fires displaced from within the Project Area” (traced via ignition points). This creates a mismatch with the benchmark and a significant loophole. i. The historical baseline $E_{LB,HRP}$ implicitly includes all fires that occurred in the belt historically, regardless of origin. Comparing this gross historical baseline against a net monitored value (which excludes fires starting outside the project area) artificially deflates the leakage estimate. ii. Activity-shifting leakage primarily involves people moving to the leakage belt to start new fires, not fires physically spreading across the boundary. Requiring a fire to originate in the project area ignores the most common form of displacement (mobile agents).	Delete Paragraph 45(c).

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