

## REVIEW FORM

- REVIEWER'S NAME: ALFRED DE JAGER
- DOCUMENT TYPE:

I. General document	II. Standard	III. Procedure	IV. Methodology	V. Support
	✓			

(Select the type of document with "✓" )

- DOCUMENT NAME: AOCF PROJECT STANDARD
- Version: V1.0

### COMMENTS:

No.	Section	Comment	aOCF answer
1	"In order to confirm conformity with the accrediting criteria, all projects are also examined using a geopropective technique (by CDS or other authorized verifiers and validators)."	What is "geopropective" ?	The geopropective approach is a way to predict and assess for future risks, and is a comprehensive method for identifying and addressing potential change impacts. It offers an interdisciplinary perspective, tying in concepts and techniques from geography, including spatial analysis methods, modelling, and GIS, to address issues of ecological impacts of climate change, urban risk and resilience, land use changes, coastal impacts, and sustainable development and potential of adaptability.
2	"Water baseline scenario: Before a project begins, consider the erosion and runoff values present in the project area."	Plus the current water storage capacity and the potential water storage capacity of both soil and	By assessing soil erosion and water infiltration we have a good enough proxy of the improvements in water retention. Deeper analysis, can provide more direct measures, however they are not

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		underground reservoirs.	cost- and time-effective for the purpose of creating a market for water credits that allow funding soil conservation works. They are, therefore, out of the scope of the aOCP.
3	“Biodiversity baseline scenario: Before a project begins, consider the biodiversity values present at a location, their present state, and their tendencies.”	From a biodiversity point of view a site is never isolated, migration routes, genetic reservoirs, isolated and endemism are to be taken into account.	The aOCP focuses on alpha diversity at species level. It is out of the scope the study of populations’ broad distribution. Rather it is meant to reveal the use of the Project area, as habitat, by species that are present in the locality and surroundings but were not present in the Project area due to its degradation.
4	“Carbon baseline scenario: The baseline scenario represents the current sequestration rate and the current carbon storage capacity of the carbon sink.”	Separate the soil carbon from the surface carbon storage, note that peatland can oxidate and propose specific challenges. Also wetlands can behave surprisingly.	Indeed, wetlands have quite different characteristics than other terrestrial ecosystems. It is therefore necessary to have a specific methodology. The aOCP will eventually develop a methodology for wetlands; it also welcomes projects proposing different methodologies, which shall be assessed and approved by aOCP Steering Committee prior to project registration.
5	“Keep in mind that a sink is defined by UNFCCC Article 1.8 as "any process, action, or mechanism that removes from the atmosphere a greenhouse gas, an aerosol, or a precursor of a greenhouse gas" (IPCC, 2022).”	The safest sink is when the Carbon is chemically bonded in the lithosphere to create carbon carbonates, carbon sequestered as pressurized gas is a potential risk, I would not count it.	This is citing the UNFCCC definition.  The document was edited to read: <i>Ecosystems act as a carbon sink, where the uptake, or removal of carbon from the atmosphere, exceeds the amount of carbon released.</i>

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6	<p>“Monitoring: Continuous or periodic collection of data. For aOCP purposes it can relate to GHG emissions, GHG removals, land cover, biodiversity, soil, water. It can be conducted through field measurements, modeling, socio-economic tools, etc.”</p>	<p>Distinguish measured monitoring (devices in the field, soil) from modelled or socio economic monitoring.</p>	<p>That’s correct. The definition was updated to read “Monitoring: Continuous or periodic collection of data. For aOCP purposes it can relate to GHG emissions, GHG removals, land cover, biodiversity, soil, water. It can be conducted through field measurements, modeling, socio-economic tools, etc.”</p>
7	<p>“Resilience The capacity of social, economic, and environmental systems to respond to or reorganize... in the face of a potentially dangerous event, trend, or disturbance ”</p>	<p>ecosystems; May be list the dangerous events here you want to have resilience for. A meteor or war maniac is always difficult to absorb.</p>	<p>The definition was updated to read “Resilience: The capacity of social, economic, and ecological systems to respond to or reorganize... in the face of a potentially dangerous event, trend, or disturbance... in the face of a potentially dangerous event, trend, or disturbance. For aOCP purposes, these include extreme geologic, weather and climatic events: fire, landslides, flooding, drought, heatwaves, earthquakes, frost, storms, etc.”</p>
8	<p>“Verification A method for assessing historical data and information statements to see if they meet requirements and are materially accurate”.</p>	<p>The only valid verification is with people you interview, your data provide the questions to be answered.</p>	<p>International good practices for issuance of high quality credits highlight the importance of objective, science-based quantitative measurements of the project’s impact on GHG reductions/removals, biodiversity, soil and water. Interviews actually inform communities’ perception on the project and may point to relevant aspects to be considered, but do not determine the amount of credits to be issued.</p>
9	<p>“...the aOCP is open to the following 5 categories of projects: forest management, regenerative agriculture, silvopastoral management, waterflow restoration,</p>	<p>This includes also the tropics? Peatlands?</p>	<p>Yes, if the project makes sense and complies with eligibility requirements in a specific category it can participate in the aOCP. For the moment, For peatlands we have not yet published a methodology,</p>

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	individual tree-based climate action/urban forests.”		although we welcome projects proposing one which shall be assessed and approved by the aOCP Steering Committee prior to project registration.
10	“...The projects must meet regulatory criteria and exhibit a conservative BAU scenario.”	What is BAU?	BAU stands for business-as-usual. BAU projections are based on the assumption that operating practices and policies remain as they are at present. Although baseline scenarios could incorporate some specific features of BAU scenarios (e.g., a ban on a specific technology), BAU scenarios imply that no practices or policies other than the current ones are in place.
11	“Permanent: Carbon credits are given out for cuts or removals that are long-lasting or, if there is a risk of reversal, must include standards for a multi-decadal period, a thorough risk mitigation plan, a compensation plan, and a way to replace any units that are lost. This also covers climatic adaptability.”	There are things as wildfires, bad luck, how do you cater for this?	Uncertainty is an inalienable aspect of working with natural systems. Through a geopropective approach for risk assessment, we define the buffer size needed to compensate loss of trees without compromising the integrity of issued credits.
12	“Accreditation principles: ..... Transparency, unique, biodiversity positive”	I miss the capacity building and expand potential here.	Issuance of credits is based on the accreditation principles. Credits are based on specific volume of carbon removals, biodiversity increases measured with the Shannon-Wiener diversity index, m3/m2/year of increased infiltration or prevented soil loss. Capacity building is not less important but out of the scope of the credits; however it may be

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			accounted for with the SDG indicators and acknowledged with labeling of credits.
13	“The environment and society must not be harmed by any of the projects taking part in aOCP.”	Ecosystem. Substitute environment with ecosystem.	The text was modified accordingly
14	“The Environmental and Social Safeguards Standard lays forth the requirements for mitigating environmental and social effects in order to adhere to the "do no harm" philosophy.”	Nice, but any significant change ‘harms’ people, for example some farmers or hunters. You must define this criteria more precise, else you can not do anything.	The no-harm principle refers, more precisely, to No-net harm. This means that the positive impacts compensate or even overcome the negative impacts. Projects are assessed individually, in order to properly understand and assess the positive and negative impacts they can have on the ecosystem and society, if they are detrimental, they are not registered in the aOCP. The no-harm principle refers, more precisely, to No-net harm. This means that the positive impacts compensate or even overcome the negative impacts. Projects are assessed individually, in order to properly understand and assess the positive and negative impacts they can have on the ecosystem and society, if they are detrimental, they are not registered in the aOCP.
15	“The Project Proponents shall ensure compliance with legal requirements by demonstrating that the project has either acquired the necessary licenses for their implementation and operation or provide an undertaking that these	Difficult issue, if you check only paper then the risk of paper fraud stays real. I would include a survey.	Part of the Validation prior registration of the Project in the aOCP includes research on the completeness and legitimacy of the provided documents. This process can comprise interviews, phone calls, web research, and other verification activities as needed.

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	<p>approvals and the licenses are under process and shall be available prior to start of commercial operations of the project”.</p>		
16	<p>“...Project Proponents must identify the proposed project's boundaries, including its physical demarcation, the emission sources, and the greenhouse gasses (GHGs) that are included in the baseline and project scenarios.”</p>	<p>What about the property of the site? Can communal lands apply?</p>	<p>We ensure that the Project proponent is the legal owner or has the authorization of the legal owner of the land, through documents, letters signed by public notary, community or other authorities. Communal lands can apply if the members agree and the continuity of the Project can be ensured for the duration of its life.</p>
17	<p>“Project Proponents are required to give plans for running and monitoring the project in accordance with the applicable Baseline and Monitoring Methodology, including plans for installing technology or adopting measures.”</p>	<p>tech needs maintenance and skills to operate.</p>	<p>We conduct technical and administrative training workshops, in sessions with the group of experts. We follow monitoring and maintenance protocols.</p>
18	<p>“Ecological communities from the taxonomic groupings listed in the PSF must be evaluated independently, and the project proposers must include for each of them the results, computations, and data used for evaluating the following in the Monitoring Report:...”</p>	<p>biodiversity loss can be caused off site for example by infrastructure creation or pesticide use. I would allow to specify this, without jeopardizing it.</p>	<p>It's an existing risk out of Proponent's control, can only be measured and reported</p>
19	<p>“The registered aOCP Project Activity must compare actual water body or water flow conditions to those</p>	<p>Make a list of possible interventions, for example to use a bulldozer to make a</p>	<p>By adhering to the Environmental and social standard, we ensure</p>

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	predicted in the registered PSF, and the project proponents must submit a comparison.”	creek meander again you might not want your project to participate. The more time you allow for interventions the better as a rule of thumb. Making little holes in the landscape to retain rainwater might be the most ecosystem friendly manner to intervene.	projects do not cause more harm than good.

**DATE:**

**\*the reviewer sent his comments via email on 25/02/2023 without using the recommended format, the comments and aOCP's answers were latter gathered in this document by the aOCP operations team.**

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**Reviewer's name(s) and signature(s)**