

Comments on first draft of FAO Voluntary Guidelines on National Forest Monitoring

General

1 The document contains much useful material, particularly on institutional arrangements for NFMS and NFIs.

2 There are no references in the present document – are these to be added?

More specific

3 At 47 pages Section III is much longer than the previous Sections I and II (together about 12 pages). Of course, Section III was always intended to be the section with the detailed guidance but the shift to much more specific material may give difficulty in countries adopting the guidelines as a whole.

4 The language seems very prescriptive – for example there are about 85 instances where the word *shall* is used, often in a heading governing multiple points. Sections I and II together use *shall* only once. Probably *shall* (which carries connotations of legal text) should not be used at all in a document which is, after all, voluntary. It would be better to make *recommendations*. This would be more consistent with a stepwise approach as foreseen in the REDD+ COP decisions.

5 The document sometimes confuses NFMS (institutional arrangements) with NFIs (the statistical system which may be part of the NFMS). In fact the latter part of the document, although it often refers to NFMS, reads more like a manual on how to develop and implement an NFI. It would be useful to do a review of the use of terms to see which is meant.

6 Although the document says early on that it takes account of the requirements of REDD+, it really focusses only on NFI-based systems and does not mention IPCC emissions inventory guidance and guidelines at all. Use of the IPCC guidance and guidelines is requested by the COP. They allow gain-loss calculations that do not necessarily require an NFI – although they can of course use NFI data if available. The GFOI Methods and Guidance document covers the linkage between the IPCC guidelines and the REDD+ estimate in some detail and cross referencing both IPCC and the MGD could be useful as a way to avoid duplication and extensive additions.

7 Joint use of remote sensing and ground-based data are mentioned but in much less detail than NFIs. This is also covered by the MGD which provides information on the availability and application of freely available remotely sensed data.

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