

SUMMERFALLOW REDUCTION (CONTINUOUS CROPPING) QUANTIFICATION PROTOCOL
Addressing October 29-30, 2009, 2nd Round Protocol Review Questions and Comments

#	Section	Type of Comment	Comment / Statement	Proposed Resolution and Modifications made to Protocol
1	Implementation	General	<p>Doubtful that a farmer would accept any liability over time. Are things registered on the title?</p> <p>Recommendation is simply calculating the economic basis and hold back. Difficult to sell to producers.</p>	<p>If after the first 5 years, they lose their buffer – no liability. It operates like an assurance factor that is incentive based. If you could track back to the land, then it can move from farmer to farmer, aggregator to aggregator.</p> <p>This isn't a forward contracting thing... if we can pull out acres, it can be done.</p> <p>No changes to protocol. This is a policy-related decision that will be reviewed by Alberta Environment.</p>
2	Quantification	Technical	<p>Why would you deliberately introduce a discount? Introducing discount factors, if permanency is real it is attached to the land as a contractual agreement?</p>	<p>Project-types and Alberta Environment need assurance that benefits are permanent. Legal title on the land would do that.</p> <p>Two options at the time of tillage development were a (1) temporary credits or (2) 90% of a value of a permanent credit. Either take a discount and get higher value or take no discount and sell a temp credit for much less. Needed a way to manage risk like an insurance pool. 10% is essentially an insurance payment. Whereas the tillage protocol retires 10% to the environment, this approach could see them paid back. Provides incentive for continued avoidance of fallow over time. Social barriers also provide barrier to policy implementation.</p> <p>No changes to protocol. Same as #1 above.</p>
3	Applicability	Policy	<p>Need to think about setting up a buffer reserve that is 20 years – need a 20 year program. This is a lot of work for 2 million acres. Why not incentive early adoption.</p> <p>Is this really a summerfallow reduction?</p>	<p><i>Summerfallow protocol talks about taking something from fallow to annual crop. Science in the prairies. The 1 is the SOM. The 1.25% is the amount that comes off from applied N. 100 order magnitude that comes off. Additional N20 is lost. There is no synthetic N applied. Mineralized N is part of national inventory approach.</i></p> <p><i>Will be described further in the Guidance Document being developed to accompany this protocol.</i></p>

				<p>Changes to protocol address the concern that was raised at the Review about defining differences between chemfallow and summerfallow.</p> <p>Definitions are clarified in the Section 1 - Glossary of New Terms on page 6 and through out the protocol in regard to project applicability.</p>
4	Implementation	Technical	Who is confirming that there has been no reversal of activities?	<p>It can and will need to be verified. If they are not in the next batch, they are assumed to have reversed and lose their 20% buffer. Until you step back you are assumed to be forward.</p> <p>Verification report should be able to track this. Farms are moving towards a digital footprint – hence there is interest in offsets. Assumption is reversal until you get the verification conducted and can prove continuous cropping on the land.</p> <p>Further information will be provided in the guidance document accompanying the protocol.</p>
5	Quantification	Technical	Is the variability (i.e. seasonal) significant? Can it be accounted for in calculation? I.e. potential concern if baseline was set in a period of time when natural high tendency for summerfallow – there could be a natural exaggeration of uptake.	<p>Numbers of acres of summerfallow are tracked. Could be taken into account. An average over time.</p> <p>The protocol requires that the baseline be calculated from data from the three consecutive years prior to the project. If the project developer determines that one or more of the baseline years was atypical in terms of summerfallow frequency due to extreme weather or other conditions, the next consecutive year(s) back may be used in its place. The project developer must provide the necessary data and trending to establish the year(s) as atypical and thus eligible for exclusion.</p> <p>No change to protocol.</p>
6	Eligibility	Technical	Concern over the issue of defining summerfallow – significant different between chem. fallow and summerfallow. (was done early on – will confirm and re-visit)	Addressed in #3 above. The definition of summerfallow has been revised and throughout the protocol.