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**Subject:** Comments on TREES 2.0, Mullion Group  
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Dear ART team,

I am writing on behalf of the Mullion Group. Thank you very much for offering the opportunity to provide feedback on TREES 2.0. Please find our comments below. Our comments 1.1 – 1.4 refer to a section for which revisions were proposed to improve clarity. We are aware that the ART Secretariat is not accepting comments on these sections officially. We are providing this feedback as we feel that TREES 2.0 would benefit from some further clarifications in this section.

Furthermore, it is possible that issues raised in comments 1.2, 1.3 and 2.1 are already covered by the variance clause (chapter 11) as long as they are not also considered as part of the crediting level determination. This is not completely clear since methods are needed to determine the crediting level. Yet the text says: *'Variances may not be proposed regarding eligibility criteria or crediting level determination and may only apply to methodological or monitoring requirements.'*

We hope this feedback is helpful.

Kind regards,  
Philipp

**Reference 1:** Section 4.1.1; Activity Data; Clarifies which remote sensing approaches are permissible and which requirements apply to each.; This clarification was made to ensure consistent interpretation of the requirements. Text has been added to confirm that all currently used remote sensing approaches are accepted and to identify more explicitly which requirements apply to which remote sensing approaches.

**Our comment 1.1:** The text under 'Conditions specific to pixel counts from wall-to-wall maps:' (p. 24-25) could be interpreted as if the use of wall-to-wall maps for activity data is not permitted in any case. This is because under point 2 it is stated that 'The stratified area estimates (bias-corrected area estimates) of the map classes must be used as activity data. [...]'.

**Our comment 1.2:** The stratified area estimates approach does not work well for time series of activity data and hinders the use of temporally explicit approaches. In many instances, biases introduced by using a temporally static approach can be higher than the biases introduced by the wall-to-wall activity data.

**Our comment 1.3:** On page 24 it is stated that more than one interpreter must analyse the reference data (majority agreement). This may be read as meaning data can only be classified by human interpreters which would exclude the use of trained algorithms.

**Our comment 1.4:** The section includes a citation for 'Olofsson et al 2020'. However, only 'Olofsson, P. et al. 2014' is referenced in Annex C: References. Pagliarella et al 2017 is also cited in this section but cannot be found in the references.

**Reference 2:** Accounting Requirements; Adds removals accounting language; Section 4.1; This addition is associated with the inclusion of removals crediting under ART

**Our comment 2.1:** In temporally explicit methods, each pixel has a discrete emission/removal amount which changes through time (different growth stages, growth curves). Each pixel also has a specific area. It would be possible to recreate overall Emission Factors and Removal Factors, but why would this be necessary?



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