

**From:** Natalia Arango <natalia@cercarbono.com>  
**Sent:** Monday, 10 October, 2022 17:21  
**To:** Supervisory-Body <Supervisory-Body@unfccc.int>  
**Subject:** Call for input 2022 - activities involving removals under the Article 6.4 Mechanism of the Paris Agreement.

Dear Supervisory Body Team

Please find attached Cercarbono's comments to the document "Removal activities under the Article 6.4 mechanism (Annex 6)".

We hope that our comments will be useful for the construction of your objectives.

Cordially

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## CALL FOR INPUT 2022 - ACTIVITIES INVOLVING REMOVALS UNDER THE ARTICLE 6.4 MECHANISM OF THE PARIS AGREEMENT

### Annex 6

#	Section	Comment
4.3.3.1.	Types of additionality - Regulatory additionality	It is necessary to be more explicit in what must be complied with for this type of additionality. It is not clear whether it is possible to demonstrate additionality only by complying with this type of additionality. The document leaves the impression that it would be sufficient to demonstrate ONE of the types of additionality to indicate that the project is additional.
	Types of additionality - Performance additionality	When the document refers to the average performance of the peer activities in the industry or the sector, it is not clear whether it refers to emissions or production activity.
4.3.3.2.	Demonstration of additionality – Positive lists	Positive lists are determined by many variables and can be very general, which can easily render them useless. Therefore, if it is decided to accept positive lists, it would be ideal to clarify the conditions for periodic monitoring of the variables that define them.
4.3.4.	Double-counting	To ensure that double counting (overlaps) does not occur, the location of projects should be publicly available.
		Minimum provisions must be in place that should contain the letter of authorization from the host party and a clear intention to participate.