

**Call for input 2023 – Issues included in the annotated agenda and related annexes of the seventh meeting of the Article 6.4 Supervisory Body**

September 3, 2023

Dear members of the Supervisory Body,

Our input is focused on A6.4-SB007-AA-A05, concerned with the mechanism activity standard for projects. Especially the possibility of switching from ex ante to ex post monitoring schemes throughout the crediting period was explored, as we believe ex post schemes should be required within forest-based removal projects.

We believe that the Supervisory Body would encourage ambition over time and a high scientific standard in promoting ex post schemes throughout nature-based solutions.

**49. In developing a monitoring plan for the proposed A6.4 project, the activity participants shall apply the following requirements unless the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents state otherwise:**

**(c) The calibration of measuring equipment shall be carried out by an accredited person or institution.**

It should be specified who the monitoring technician shall be accredited by, and in which cases accreditation is required for personnel.

**d) Measured data with high levels of uncertainty shall be compared with data from other sources to check the consistency.**

“High” levels of uncertainty should be defined. Also, the mechanism through which uncertainty is estimated will significantly affect the comparability of results. E.g., machine learning tools are often unable to provide uncertainty values outside of the areas in which they have been trained.

While measures of precision are commonly used, when ground truthing isn’t possible, uncertainty should be assessed focusing not only on precision, but importantly also on accuracy. We recommend to demand both a measure of uncertainty reflecting accuracy and precision. Minimum requirements for both accuracy and precision should be determined for all monitoring technologies.

**59. A project that has been registered as an A6.4 project may not be re-registered after the expiry of its final crediting period.**

We believe it is important that projects can be re-registered after the expiry of their final crediting period. Especially forestry projects, should provide landowners with a lasting solution, by allowing for the generation of income through carbon offsets.

If projects cannot be re-registered forest owners will be forced to resume timber harvesting to generate an income after the project, which would lead to a lack of compliance with the permanence requirements for removal projects. Specifically in forest projects re-registration is a necessary option, as permanence cannot be ensured without the possibility of re-registering the project after expiry of its final crediting period.

**79. (f) Removing or adding one or more sites of the project registered with multiple sites;**

In the case of forest-based projects it should not be allowed to add or remove sites from the registered project. As baselines and additionally are specific to a unique area, it would e.g., allow foresters to remove areas when harvesting operations occur, or add sites ones the area has been clear-cut, as young forests sequester most CO<sub>2</sub>.

Additionality could not be claimed if areas can be added and removed throughout the project cycle.

**79. (i) Voluntarily updating the applied methodologies or the other applied methodological regulatory documents to a later valid version of them, or voluntarily changing to other methodologies, provided all requirements in the updated/changed methodologies and the other applied methodological regulatory documents are met.**

Updating applied methodologies or other applied methodological regulatory documents should be mandatory as revised and updated versions are published to ensure scientifically sound project and monitoring designs.

**95. (g) Provide information about appropriate emission factor, IPCC default value and any other reference value.**

The use of appropriate emission factors, IPCC values, etc. should not be required if data specific to the project activity and its area is available or producible. The IPCC Tier 1 default values are specifically to be used to estimate greenhouse gas emissions at the national scale. Applying the default values on smaller scale projects would misrepresent and possibly overestimate the projects' true emissions.

**98. For a registered A6.4 project that applied a methodology or methodological tool providing a choice between an ex ante and an ex post determination of parameter values for calculating baseline GHG emissions or net GHG removals and that chose the ex post determination where there was no applicable standardized baseline valid at the time of registration, the activity participants may, at any time during the first crediting period, switch to the ex ante determination by applying an applicable standardized baseline that becomes available after the registration and is valid at the time of the switch, and apply the same version of the standardized baseline for the purpose of monitoring for the remainder of the same crediting period. Such switch and application of a standardized baseline shall undergo the post-registration change approval process in accordance with the "Article 6.4 mechanism activity cycle procedure for projects", and the standardized baseline shall be valid at the time of the submission of the post-registration change approval request.**

Project proponents should not have the option to switch from ex post to ex ante or vice versa. As the amount of A6.4ER's could significantly increase or decrease depending on the applied method of monitoring this would encourage activity proponents to choose the option that possibly overestimates the quantity of CO<sub>2</sub> removed. As ex post monitoring, with a project-specific baseline leads to the most accurate representation of project emissions, the Supervisory Body should ensure that activity proponents apply said method. Only if it is deemed impossible, due to the project's nature, should activity proponents be allowed to deviate from ex post monitoring schemes and instead apply an ex ante approach, using an approved standardized baseline.

Thanks for your continued commitment and communication.

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