

Article 6.4 Supervisory Body

26 October, 2023

By electronic mail submission to A6.4mechanism-info@unfccc.int

RE: Call for stakeholder input to A6.4-SB008-AA-A15 Draft recommendation Activities involving removals under the Article 6.4 mechanism

Thank you for the opportunity to provide comment on version 3 of the Draft recommendation for Activities involving removals under the Article 6.4 mechanism.

There are three key areas I believe would benefit from further refinements including: -

1. Better terminology and definitions to allow clear and specific specifications to be made especially in relation to emissions and removals and the net benefit or comparison from the project and baseline scenarios.
2. Inclusion of an appropriate mechanism that allows for recognition and incentivization of land-based activities, specifically forest activities that include periodic harvesting of wood.
3. Further development and clarification on the operation of the buffer pool.

Specifically, my comments are: -

Section 2 – Context of removals under this guidance

Should not indicate two definitions for removals but apply one, conditions of eligible activities should be set by the mechanism not through an IPCC definition. That is these definitions are overlapping with eligibility and other requirements. Suggest keeping to original older IPCC definition regarding the chemical process only. That is definitions should be on the outcome that is the GHG removal, eligible activities considered under the mechanism should be separately addressed and specified.

Section 3 – Requirements

Throughout

There is never inclusion within the text of the emissions that can also occur alongside certain types of removal activities, both need to be accounted for and specified for accordingly.

There is no term that outlines the net benefit or difference clearly or the comparison between the project and baseline scenarios, this makes establishing clear specifications problematic.

Paragraph 10 Somewhat unclear and unnecessary - should be part of QA/QC of monitoring plan

Paragraph 11 The establishing of arbitrary uncertainty limits that are acceptable but where those moving just beyond only are adjusted is not considered optimal, each project should be adjusted based on its actual uncertainty. If this is still within methodologies, why is it being included. The option to have a better approach should at least be available by not being specific here.

Paragraph 13 Mentioned that default values need to be demonstrated to underestimate actual removals. Need to split this to be specific to the project and the baseline scenario, removals should not be underestimated for the baseline scenario. That is, they should not overestimate the project nor underestimate the baseline. Or ensure it refers clearly to net removals (the calculated difference between the project and baseline scenario). The language and terms which are avoiding the comparison of project to baseline is problematic.

Paragraph 14 This level of detail should either be left to the methodology or expanded to include a better range of important factors not just cross checking against other sources.

Paragraph 15 This is an excellent provision.

Paragraph 18 This is an excellent provision

Paragraph 25 Unclear what is meant by 'any activity', redundant

Paragraph 26 Is there a definition of net removals? As per above emissions are routinely also a part of some removal projects comprehensive accounting. Biological removals projects will have emissions and removals that need to be tracked and a defined benefit outcome that compares the project and baseline scenario net emissions and removals. Current definitions and accordingly specification wording is unclear.

Paragraph 29 This would indicate there is no mechanism that allows for the inclusion of production forest activities with cycles of steady removals and larger periodic emissions, but that will contribute to substantial accumulation of net removals over time (for long durations). If no mechanism for this is included this will limit the uptake and effectiveness of the mechanism substantially. To not include an activity type that can not only achieve significant reductions to atmospheric GHG levels but that results in an almost GHG neutral, sustainable and renewable source of material and energy into the future does not seem rational.

Paragraph 30 Suggest very clearly and specifically defining planned and unplanned reversals.

Suggest Paragraphs 40 to 46 need further clarity and development.

Paragraph 47 description of buffer pool should be further developed.

Paragraph 54 is potentially highly problematic and should be considered carefully, the purpose of the pool should be to act as a kind of insurance for all participants. Would suggest at worst project cannot

be issued with any subsequent units until re-achieving prior levels, while the pool is used to cover this period (its purpose).

Paragraph 55 Would suggest buffer units are neither cancelled nor returned but that at an intermediary point a re-assessment and true up essentially with reduced ongoing rate is applied for good track record.

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