

Name of submitter: Government of Guyana

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Legend for Columns

- 0 = A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)
- 1 = Section Number in the document
- 2 = Paragraph number
- 3 = Comment – the actual feedback or observation, including justification for what needs changing
- 4 = Proposed change – suggest the text if possible

0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A01	4	15	To achieve action at scale, jurisdictional scale approaches should not be delayed or deferred. These are recommended to be included early on in the process. Additionally, policy and SFM also need to be considered with immediacy as the impact of the last few high forest cover low deforestation jurisdictions may soon also loose this status with no incentive or coverage by Article 6.4.	
A6.4-SB009-A01	4.3	27	Business as usual also needs to consider absence of policies for protection of forests and sustainable forest management. Business As Usual also needs to be relevant to what would have happened over the past 15-20 years, some Parties made deliberate policy decisions to be first-movers on ambitious actions, whereas others did not - demonstrating moral hazard where parties which choose a high emitting pathway benefit twice: once from the benefits of the high-emissions activity in the short term, and then once from establishing a high baseline to create incentives for reducing emissions.	
A6.4-SB009-A01	4.6	38 (iii)	For jurisdictions that have maintained low deforestation rates, this forces such jurisdictions from article 6.4 participation. This perverse impact will lead to millions of hectare of non-participation or worse yet, loss over time due to lack of appropriate incentives. Creating a baseline on strictly historical emissions without an adjustment to provide for the unique circumstance of high forest cover low deforestation jurisdictions will be damaging to the effectiveness of Article 6.4. The use of an HFLD score along with a factor approach to provide for that space for HFLDs to participate would be necessary. Creates moral hazard and introduces incentives for deforestation / increased ghg emissions.	
A6.4-SB009-A01	6	85	Leakage needs to also address cross-border leakage risks between parties. If any forest country party in a region is excluded from Article 6.4, it creates inward leakage pressures. Article 6.4 methodologies / baseline need to be geographically holistic and inclusive - when this relates to REDD+, methodologies / baselines need to be compatible with ALL aspects of REDD+ and not just some to avoid leakage and as a result, cancel out additionality.	

Call for public input – Template for input		A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)		
0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A02	2.1	5 (b)	Some distinction needs to be made regarding high forest low deforestation jurisdictions and CO2 uptake as this is as a result of deliberate policy actions that prevent threats to forest. Ongoing removals across forest countries are a result of deliberate policy decisions, how to properly reflect and incentivise that for the long term?	
A6.4-SB009-A02	2.2	6 (a)	Intact Forests and forests under sustainable forest management, especially those in HFLD jurisdictions that fight off constant threats and human interventions to protect forests. This should be included in the definition. The incentives should encourage the acceleration of countries to achieve higher HFLD scores - regardless of starting positions (e.g. high deforesters need to be incentivised to reduce as rapidly as possible, and not be prevented from accelerated action through disincentives to reductions being achieved in short time frames (and then less reduction potential for future baseline reference periods).	
A6.4-SB009-A02	3.1	8	This should also include intact forest in HFLD jurisdictions.	
A6.4-SB009-A02	3.1	12	Net removals in intact forest can be computed by logged forests vs unlogged forest, with the latter being the contractual (control/reference point).	