



PUBLIC CALL FOR INPUT

A.6.4 SB009-A01

A.6.4 SB009-A02

REMOVAL ACTIVITIES IN AGRICULTURAL SECTOR

ORMEX would like to thank the SB for allowing us to comment on two important texts proposed to structure the implementation of Art.6.4, especially the specific requirements related to carbon removal.

Regenerative soil and new agricultural regenerative practices carried out by farmers must be fully recognized as one of the most crucial multifunctional assets for maintaining humanity's resilience. Agriculture role is not only about mitigating climate change by reducing emission and promoting carbon removal and storage on soil and biomass, but to see agriculture sector as a key player in storing carbon, in water management, in biodiversity conservation and reconstruction, and maintain land resilience in relation with the adaptation goals and food securities. Over 866 million people work in agriculture (more than a quarter of the world's workforce) as reported the United Nations Food and Agriculture Organization, Art. 6.4 would have a key role to achieve the imperatives of transition and transformation of agricultural and food systems that require greater investment and financial efforts in the design and implementation of innovative practices, especially in agroecology.

These key recommendation documents will impact the implementation of the art.6.4 mechanism for agricultural removal methodologies and financial attractiveness of soil regenerative projects in agriculture. We urge SB to continue considering the specificities of livelihoods and the land management practices on soil health and biomass enhancement by farmers for the common interest of humanity, and to allow agriculture with regenerative practices to be a significant operational sector under art.6.4 mechanism.

Given the complexity of the mechanism, ORMEX encourages the SB to continue to maintain the need for a clear, simplified, and understandable text for proper implementation of the requirements and procedures by all participants.

We appreciate the opportunity to provide inputs and we thank you for your thoughtful consideration.

Please find more details in the form below.

About ORMEX

ORMEX STANDARD is a globally recognized standard on the voluntary carbon market for the certification of projects that through the implementation of regenerative practices in the agricultural sector aim to reduce GHGs emissions, naturally store carbon in the soils and contribute to the improvement of sustainable development objectives through a holistic approach that grouped the implementation of regenerative practices in the agricultural sector of Agriculture, Forestry and Other Land Use, and the contribution to the improvement of Sustainable Development Goals according to the UN's 2030 Agenda. ORMEX STANDARD recognizes the need of transition and major transformation of the agricultural and food system, takes into account the various challenges facing farmers, and fully includes maintaining yields and productivity as a major performance and incentive of agriculture transition.

<https://www.ormex.io/>

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Call for public input – Template for input	A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)
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Name of submitter:

[ORMEX](#)

Affiliated organization of the submitter (if any):

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Date:

[15/04/2024](#)

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

0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Meths	4.2	26 (c)	We encourage that the methodologies requirements consider the specificities of the nature-based solutions in regard to the demonstration of the calculated emissions reductions or removals to be <i>“uniquely achieved by and attributable to the activity”</i> .	

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0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Removals	3.2	16	The last part of the sentence referring to the “residual reversal risk” and “potential future reversals are remediated” must be clarified. The text can be rephrased if it refers to the paragraphs that follow. (see proposed change)	“Monitoring shall also be conducted after the end of the last active ⁵ crediting period of the activity <u>to ensure a risk management continuity and treatment of reversals during the Post-crediting period in accordance with the paragraphs of this section.</u> to ensure that the residual risk of reversals of removals for which 6.4ERs were issued is negligible and/or that potential future reversals are remediated.
Removal	3.2	18	The specificities of nature-based solutions should be fully considered on the operationalisation of this paragraph.	
Removal	3.2	20	The timeframe for the Post-crediting Period, the related monitoring requirements, the submission modalities and evidenced-base data have to be determined with details for identification of the related financial means that are necessary to support such monitoring during the Post crediting Period and the submission as per paragraph 18.	
Removals	3.6.3	Title	The title may be confusing as it is not about reversal event but remediation of reversal. It is proposed to be more specific.	3.6.3 Addressing Reversal risk and reversal <u>Addressing Remediation in the event of Reversals</u>
Removal	3.6.3	48	“The Reversal of removals for which 6.4 ERs have been issued” should be better clarified and defined. Would it be solely when the amount of Reversal quantification exceeds the amount of the monitored Removal quantification with the consequence of affecting the issued 6.4 ERs?	
Removals	3.6.3	49	Reference of the related sections would be helpful to improve the reading and understanding of the type of remediation detailed in sections 3.6.3.1 and 3.6.3.2. “and/or” may be confused. The section 3.6.3.1 and 3.6.3.2 refers to conditions to apply. It seems not clear how the measures can be used in combination.	49. Reversal shall be remediated through the cancellation .. Measures for effecting the cancellation include the cancellation of the Reversal Risk Buffer Pool <u>as per section 3.6.3.1</u> and/or the direct cancellation of 6.4 ERs from other 6.4 activities for this purpose <u>as per section 3.6.3.2.</u>

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Removal	3.6.3	51(a)	This can be analysed by the SB during the review of the first Monitoring Report, including the risk assessment, with a list of events that potentially led to a Reversal and their “unavoidable” or “avoidable” nature being taken into consideration (whether the risk can be bypassed or not by appropriate measures). This pre-approval based on the nature of the risk would have the benefit of reducing the timeframe for reviewing when the risk occurs.	
Removal	3.6.1	51(c)	The criticality of the risk may vary considering the activities. It would be in interest of the activity participants to have specific “negligible reversal risk” threshold determined per methodologies considering the activities.	
Removals	3.6.3.1	56	It may be interested for the public to have information about the amount of the Cancelled 6.4 ERs per activity participant account (and the associated vintage or a cumulative aggregate amount of cancelled 6.4 ERs) and the reason of the unavoidable Reversal	“In addition to regular stress-testing, the composition of the buffer pool, including the share of 6.4 ERs by vintage, region and country, activity type, methodology, <u>and the cumulative amount of cancelled 6.4 ERs for remediation associated with the nature of the unavoidable Reversal</u> should be published annually.
Removals	3.6.3.2	title	The title may be confusing with other type of remediation. It is proposed to be more specific	“3.6.3.2 Direct cancellation of 6.4 ERs <u>from other 6.4 Activities</u> ”
Removal	3.6.3.2	57	For better understanding, the text should clarify that circumstances (a) and (b) are not cumulative.	“Reversals of removals for which 6.4 ERs have been issued shall be remediated through the cancellation of an equivalent amount of 6.4 ERs from other 6.4 activities in <u>one of</u> the following circumstances:”

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0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Removal	3.6.3.2	57(a)	The threshold for determining “negligible reversal risk” should be established using methodologies that take into account the type of activities (see comment on 51c). The qualification of “negligible risk” must be considered and approved by the SB based on the risk assessment rating. Direct cancellation would be possible after the SB approves the qualification of negligible risk, not only as evidenced by the risk assessment. This would be reflected in the text. Taking into account the type of the activities, the activity participant may have an interest to indicate its decision not to use the Reversal Risk Buffer Pool for the sole crediting periods (or some of them). For the Post-crediting monitoring periods, the activity participant may submit request as per section 18. This can create more flexibility considering the type of activities.	“Activity participants implementing an activity with negligible reversal risk, as evidenced by the risk assessment <i>and approved by the SB</i>, indicate in the project design document that the activity will forego use of the Reversal Risk Buffer Pool throughout all active crediting periods and the post-crediting monitoring period;”
Removal	3.6.3.3	60	Determining the guidance for qualification of unavoidable and avoidable risk should be a priority. This needs to be clearly defined and linked to the ability to bypass the risk by implementing appropriate measures. The methodologies should identify what would be considered as “avoidable” with the implementation of the proper measures, and allow participants to propose specific measures.	

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