

From:

Date: On Monday, March 25th, 2024 at 5:18 PM

Subject: Stakeholder consultation – Meth requirements & removals

To: A6.4mechanism-info@unfccc.int <A6.4mechanism-info@unfccc.int>

Dear Supervisory Body members,

We are hereby submitting our inputs in respect of the “Call for input 2024 - Stakeholder interactions: Further input - Requirements for methodologies and activities involving removals”. Our input is limited to the removals document.

We are a small group of rural communities located in the desertic parts of Nevada supported by a group of volunteering students of international law and environmental law who have studied the voluminous inputs provided by the stakeholders to the Supervisory Body and helped synthesize this short input for your consideration.

Our main concern is the overboard definition of "removals" contained in the recommendation document. We would like to draw your attention to the fact that redefining “removals” or “activities involving removals” is not a part of the mandate given by the CMA to the Supervisory Body. We also explain how such a move to redefine removals runs counter to the objectives of the Article 6.4 mechanism.

We would also like to express our support to the numerous other stakeholders who have earlier provided more detailed inputs than ours, including but not limited to, the following: Center for International Environmental Law (CIEL), Heinrich Böll Foundation, Action Group on Erosion Technology and Concentration (ETC), Biofuelwatch, Cornwall Carbon Scrutiny Group, Dogwood Alliance, Fern, Office of the United Nations High Commissioner for Human Rights (OHCR), Climate Land Ambition and Rights Alliance, John Muir Project, and all other stakeholders who have raised their concerns in the favour of environmental interest of climate protection rather than in favour of commercial interests. We urge you to kindly study the inputs by the above stakeholders in greater depth before making your decision in this regard.

We thank you for giving us the opportunity to submit our views.

Respectfully,

SaveClimate Campaign, Nevada

----- Input follows in the format -----

Name of submitter:

Affiliated organization of the submitter (if any): SaveClimate Campaign

Contact email of submitter:

Date: 25/03/2024

Meths or removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
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Removals	2.1 Context	5	Atmospheric methane removal should not be included in the scope of the Article 6.4 mechanism 1) In our view the 'context' quoted from the IPCC Report AR6-WG-III is not the right context. The IPCC report concludes that “there are currently no removal methods for non-CO2 gases that have progressed beyond conceptual discussions”. The recommendation document refers to the definition of “anthropogenic removals” to include non-CO2 gases. 2) The IPCC report does not discuss “anthropogenic removals” anywhere in the body of the report; it is only mentioned in the glossary and even there the entry refers to CO2 removals. 3) The recommendation document takes the first sentence of the glossary entry "anthropogenic removals" and omits the rest. The full glossary entry is quoted here: “Anthropogenic removals: The withdrawal of greenhouse gases (GHGs) from the atmosphere as a result of deliberate human activities. These include enhancing biological sinks of CO2 and using chemical engineering to achieve long-term removal and storage. Carbon capture and storage (CCS), which alone does not remove CO2 from the atmosphere, can help reduce atmospheric CO2 from industrial and energy-related sources if it is combined with bioenergy production (BECCS), or if CO2 is captured from the air directly and stored (DACCS).” 4) Furthermore, the IPCC report, in "Cross-Chapter Box 8 Carbon Dioxide Removal: Key Characteristics and Multiple Roles in Mitigation Strategies", has the following text: “As there are currently no removal methods for non-CO2 gases that have progressed beyond conceptual discussions (Jackson	Remove section “2. Context of removals under this guidance”.
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			et al. 2021), achieving net zero GHG implies gross CO2 removals to counterbalance residual emissions of both CO2 and non-CO2 gases, applying 100-year global warming potential (GWP100) as the metric for reporting CO2-equivalent emissions, as required for emissions reporting under the Rulebook of the Paris Agreement.” 5) In scientific terms, it will be absurd to spend resources on removing methane from the atmosphere. Methane stocks in the atmosphere are linearly proportional to the magnitude of the methane flux entering into the atmosphere, and the only effective mitigation action is to reduce the magnitude of this flux. 6) In conclusion, atmospheric methane removal should not be included in the scope of the Article 6.4 mechanism because: a) There is no mandate from the CMA to expand the scope to include atmospheric methane removal. b) There is no support for atmospheric methane removal in the IPCC report. c) Atmospheric methane removal, even if feasible, would not support any of the objectives of the Article 6.4 mechanism. d) Numerous stakeholders in their submissions to the Supervisory Body have argued against including atmospheric methane removal in the scope of the mechanism.	
Removals	2.2 Definitions	6	Engineered removal activities are not consistent with the objectives of the mechanism The definition leaves eligibility open to all types of activities. We understand that this is done to accommodate engineered removal activities. However, engineered removal	As suggested above.

			activities, which are of interest to the carbon industry and businesses, are not consistent with the objectives of the mechanism. In fact, such activities run counter to the objectives of the mechanism and can cause a great deal of harm to the climate, the ecosystems, and the human society in general. In our view, there is no evidence for technological feasibility and mitigation efficacy of such activities, and even if these were feasible and efficacious, including such activities under the mechanism would have no legal, economic, environmental, social, or ethical justification, as explained below. There is no mandate for (re)defining “removals” and “activities involving removals” Including engineered removals such as direct air carbon capture (DACCS) and enhanced rock weathering (EW) have no legal basis for the following reasons: 1) There is no mandate in the decision 3/CMA.3 for the Supervisory Body to (re)define “removals”. The mandate is to make recommendations on “activities involving removals, including appropriate monitoring, reporting, accounting for removals and crediting periods, addressing reversals, avoidance of leakage, and avoidance of other negative environmental and social impacts”. 2) The word “activity” used in the decision 3/CMA.3 has a specific meaning which is defined in the Annex to the decision, section “Definitions” as follows: For the purpose of these rules, modalities and procedures: (a) An “Article 6, paragraph 4, activity” is an activity that “meets the requirements of Article 6, paragraphs 4–6, these rules, modalities and procedures, and any further relevant decisions of the Conference of the Parties serving as the meeting of the	
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			Parties to the Paris Agreement (CMA)". 3) Thus, an "activity involving removals" is already defined as an activity that meets "the requirements of Article 6, paragraphs 4–6," among others. The Supervisory Body should base its work on this definition and should not attempt to re-define either "removals" or "activities involving removals". 4) "Removals by sinks" is a term that is extensively used in the texts of the UNFCCC Convention, the Kyoto Protocol, the CDM Modalities and Procedures, and the Paris Agreement, where the use of the term consistently implies the natural sinks. 5) The Convention text notes the role and importance of "sinks and reservoirs of greenhouse gases" in "terrestrial and marine ecosystems" and expects each Party to take measures for "protecting and enhancing its greenhouse gas sinks and reservoirs". 6) The Convention text talks of the need to "take into account the best available scientific knowledge, including of the effective capacity of sinks". Engineered removals such as removal of CO₂ from the atmosphere through industrial-chemical methods cannot have any meaningful reference to their "capacity". 7) The Paris Agreement text requires each Party to regularly provide a "national inventory report of anthropogenic emissions by sources and removals by sinks of greenhouse gases, prepared using good practice methodologies accepted by the Intergovernmental Panel on Climate Change and agreed upon by the Conference of the Parties serving as the meeting of the Parties to this Agreement." To date there is no IPCC guidance on how to account for engineered removals such as removal of CO₂ from the	
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			atmosphere through industrial-chemical methods. 8) The Paris Agreement text recognizes “the importance of the conservation and enhancement, as appropriate, of sinks and reservoirs of the greenhouse gases referred to in the Convention,” while “noting the importance of ensuring the integrity of all ecosystems, including oceans, and the protection of biodiversity, recognized by some cultures as Mother Earth.” 9) The Paris Agreement, under Article 6, paragraph 4, establishes a mechanism to “promote the mitigation of greenhouse gas emissions while fostering sustainable development”, “to contribute to the reduction of emission levels in the host Party” and to “incentivize and facilitate participation by public and private entities” in greenhouse gas mitigation. Engineered removals and carbon-centric industrial commercial activities, such as DACCS, do not relate to any of these objectives. 10) There is no place to account for engineered removals, geoengineering activities and carbon management activities in the national GHG inventories under the UNFCCC process. If the scope of the inventories is to be revised, the Conference of the Parties (COP) will have to make a request to the IPCC for revising the National GHG Inventories Guidelines and the reporting tables. 11) Neither the Convention nor the Paris Agreement envisages that Parties should create engineered sinks through setting up industrial scale facilities to chemically scrub the CO₂ from the atmosphere. 12) While the COP could consider such approaches in the future, presently there exists no UNFCCC context for talking about carbon-centric activities aimed at “atmospheric repair” such as direct air carbon capture	
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			(DACCS), enhanced weathering (EW), and ocean alkalization. 13) The A6.4 mechanism is a successor mechanism of the CDM and the scope of activities involving removals remains the same as in the CDM, namely, activities of afforestation and reforestation. Other requirements such as land eligibility (the 31 December 1989 cutoff date) and definition of forests (to be communicated by host Party) also remain the same. 14) The mandate from the CMA does not ask the Supervisory Body to extend the scope of eligible activities. 15) Extending the scope of eligible activities to additional LULUCF activities under the CDM was considered by the SBSTA for many years but no agreement was reached. 16) No decision has been made under the Paris Agreement to extend the scope of removal activities. The only decision of the CMA in this regard is decision 3/CMA.3 and that decision does not mandate the Supervisory Body to change the scope of activity types. 17) Any attempt by the Supervisory Body to redefine this term to accommodate engineered sinks and geoengineering approaches would amount to exceeding the CMA mandate and going beyond the scope of the UNFCCC Convention and the Paris Agreement texts. Activities of engineered removals are contrary to the objectives of the Article 6.4 mechanism Engineered removal activities are contrary to the objectives of the Article 6.4 mechanism by impeding low-GHG sustainable development, as described below: 1) The Article 6.4 mechanism, like the CDM, is aimed at supporting to activities that contribute to low-GHG sustainable development. This is evident	
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			from the text of decision 3/CMA.3, which provides the definition of "Article 6, paragraph 4, activity" as an "activity that meets the requirements of Article 6, paragraphs 4-6, ...", and two of the requirements mentioned in Article 6, paragraph 4, are "to promote the reduction of greenhouse gas emissions while promoting sustainable development" and "to contribute to the reduction of emission levels in the host Party". Engineered removal activities such as DACCS and EW respond to neither of these objectives, as these activities are atmospheric repair activities and not economically productive or ecologically protective activities supporting low-GHG sustainable development. 2) On the contrary, engineered removal activities work against both the mechanism objectives mentioned above. They impede low-GHG sustainable development by diverting scarce resources of energy, water, land, capital, and labor, thereby being a burden on the economies and the societies. They also impede the objective of "reduction of emission levels in the host Party" by diverting host Party resources for the cause of atmospheric repair which does not relate to the "emission levels in the host Party". 3) It is to be noted that the Paris Agreement requires Parties to achieve global peaking of emissions as soon as possible and to "undertake rapid reductions thereafter in accordance with best available science so as to achieve a balance between anthropogenic emissions by sources and removals by sinks of greenhouse gases in the second half of this century, on the basis of equity, and in the context of sustainable development and efforts to eradicate poverty." 4) Repairing the atmosphere is a post-decarbonization activity/ responsibility and mixing this with	
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			decarbonization objectives under the Article 6.4 mechanism implicitly admits a failure of decarbonization within the mechanism itself and thwarts the very efforts of furthering low-GHG sustainable development. This is further clarified through examples: 5) In our view, “geoengineering” and “atmospheric repair” activities cannot be supported under the Article 6.4 mechanism. We clarify this through examples of hypothetical activities that do and do not accord with the objectives of the Article 6.4 mechanism: a) An activity incentivizes planting of trees by promoting practice of agroforestry. When done properly, such an activity enhances food security, improves the sustainability of the soils over the long term, provides supplemental income or nutrition for farmers, and makes agricultural practices resilient to climatic changes. The underlying activity is therefore promoting “sustainable development” and contributing to “the reduction of emission levels in the host Party” by absorbing the CO₂ from the atmosphere. This activity therefore belongs to the A6.4 mechanism. b) An activity aims to clear a woodland of low productivity and low per-hectare carbon stocks and establish a fast-growing high-density short-rotation plantation. The biomass harvested is pushed into underground storage. This activity does not perform any economically productive or ecologically protective function. It consumes economic resources of land, water, capital, and labor and eventually creates ecological destruction by turning the land into a desert by virtue of depleting the soil nutrients. Even though this activity absorbs CO₂ from the atmosphere and stores it underground, thereby	
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			achieving removals, it does not accord with the A6.4 mechanism since it runs counter to the objectives of building a low-GHG sustainable economy. 6) We note that carbon-centric activities of this type can be used to establish a “carbon industry” feeding into “carbon businesses” playing in a national or global carbon market, creating new profits but also new conflicts and competitions and resource colonization. Such industries and markets can be a repeat of the first industrial-era scenario where rampant profiteering led to over-exploitation of natural resources, destruction of ecosystems, and enslavement of populations, first at home and then in other nations that were colonized for appropriating their natural resources and labor. 7) Enabling a free-for-all carbon market is not an objective of the A6.4 mechanism. The A6.4 mechanism can more appropriately be seen as a ‘sustainable development marketplace’ where carbon removal is a by-product or a positive spillover of sustainable development. 8) Countries with large historical emissions that have the necessary level of resources may operate such carbon-centric activities domestically, first to achieve their NDC ambitions of net-zero, and subsequently to repay their carbon debt arising from high historical emissions. Even for such a scenario, the carbon-centric removal activities will have to be first recognized as positive climate contribution and accorded a place to be accounted for under the UNFCCC regime, in order to avoid these becoming a means of masking the fossil fuel economies as carbon-neutral economies, which does not accord with the present text of the Convention.	
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			9) A quick scan of published literature reveals that engineered removal activities can entail serious risks for the economy, the human society, the ecosystems, and the climate itself. We list below some concerns and related excerpts from the publications as evidence: a) There is a lack of evidence for feasibility, credibility, and efficacy of such activities: “all known technologies face the challenge of high current energy requirements and cost” [Ref 11] b) These activities create possibility of circumvention and dissimulation to thwart genuine climate action: “serious concern is raised about CDR as a way to circumvent necessary emissions reduction, hence perpetuating the status quo of fossil fuel use” [Ref 15] c) The legitimacy of the agenda or the political motivation behind such activities is questionable: “the IPCC's occasional credibility problems to the corruption of science by political interests ... As responses to the “Climategate” affair show, public trust in the IPCC is not simply based on pure, scientific consensus ...” [Ref 13] “The SRES–RCP shift arguably created the space for more speculative technological futures to find their way into officially authorized scenarios ... [Ref 13] “the irreducibly political character of carbon removal imaginaries and accounting practices and urges acknowledgement of past experiences with the implementation of (small-	
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			scale) carbon sequestration projects” [Ref 16] d) These activities entail unknown risks to environment, human populations, including opening more possibilities of human rights violation as well as geopolitical conflicts, competition, and strife: “material requirements of various NETs might also impact geopolitical constellations and induce conflict” [Ref 12] “the antithesis of sustainable development” [Ref 8] “associated export opportunities” [Ref 9] “the current ‘gold rush’ atmosphere of removal markets” [Ref 10] “can be depicted as an act of neocolonialism that merely preserves patently unjust international political relationships, with rich countries hoarding benefits, and poorer countries suffering unevenly all of its risks” [Ref 17] e) These activities lack social acceptance and globally suffer from adverse social perception: “consistent view of option performance emerged across both the citizens’ and the specialists’ deliberations, where geoengineering proposals were outperformed by mitigation alternatives” [Ref 14] 10) We also notice that the Supervisory Body is imputing a different meaning to the Article 6 of the Paris agreement by changing its characterization as carbon market mechanism in a new website where text such as “The Supervisory Body of Article 6.4 mechanism, also known as the Paris Agreement Crediting Mechanism” is being promoted. This website talks of Article 6 in	
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			entirety. Article 6, paragraph 2, of the Paris Agreement provides that “Parties shall ... promote sustainable development”, and Article 6.4 is also premised on promoting sustainable development. It is clear thus that sustainable development is the basis of voluntary cooperation under both Article 6.2 and Article 6.4. Nowhere does the Paris Agreement text speak of “carbon market” or of “crediting mechanism”. In our view, the Supervisory Body is promoting deliberate confusion by propagating different vocabulary on its web sites [Ref 19]. Engineered removal activities will open the doors to human right violations for the sake of private profits Introducing engineered removal activities under the UNFCCC regime will be a major decision that is fraught with social, political and ethical risks and conflicts: 1) The Supervisory Body has an obligation to protect the energy and food security, livelihoods, and human rights of vulnerable groups, as mandated in decisions 3/CMA.3 and reiterated in decision 7/CMA.4 through reference to the 11th preambular paragraph of the Paris Agreement. Further, the Paris Agreement emphasizes “the fundamental priority of safeguarding food security and ending hunger, and the particular vulnerabilities of food production systems to the adverse impacts of climate change”. The Supervisory Body should not act counter to these obligations and priorities by allowing activities that would potentially threaten the rights of the vulnerable people and undermine the health of the ecosystems. A recommendation by the Supervisory Body to include such activities in the A6.4 mechanism could thwart these objectives.	
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			2) Public input received by the Supervisory Body clearly points to the risks and dangers to the society of the engineered removal activities, while also questioning the legality of such activities under the Article 6.4 mechanism, or indeed under any instrument of the UNFCCC. Many of those inputs contain detailed information with relevant sources cited therein. [Ref 5] 3) The recently published report of the expert group on “new technologies intended for climate protection (NTCPs)” by the Human Rights Council of the UN General Assembly clearly states that “at this stage of their development, given the lack of sufficient knowledge of their risks and adverse impacts, it might be better to presume that all NTCPs are generally harmful to human rights and that their deployment would be contrary to the existing obligations of States.” [Ref 6] 4) The report further concludes that “states should consider disincentivizing the development and deployment of carbon dioxide removal techniques by withholding public support (including funding) for them and requiring research to be non-profit based, while showing transparency, including by disclosing any finance provided by the fossil fuel industry”. [Ref 6] 5) An arbitrary recommendation to include engineered removal activity in A6.4 mechanism will have reputational risk implications for the Supervisory Body in terms of impartiality and public trust. 6) Transparency International in its 2022 report on geoengineering states that “the possible profits that may be obtained from patented carbon dioxide removal (CDR) and solar radiation management (SRM) technologies may push individuals and corporations supporting such technologies to try to manipulate governmental and	
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			intergovernmental decision-making and norm-setting in order to, for example, obtain funding or policy endorsements for the technologies they support.” Supervisory Body could be seen as willing to promote these interests. [Ref 7] 7) The large number of stakeholder inputs provided through a coordinated campaign of interest groups of engineered removals has been cited by the Supervisory Body as an overwhelming support for these measures. We could not find any rationale in these inputs for justifying how such activities could contribute to low-GHG sustainable development, nor any satisfactory evidence of resolving the uncertainties, risks and costs imposed by such activities on the society, the environment, and the ecosystems. 8) Lack of substantive scientific, economic, ecological, and environmental assessment and due diligence by the Supervisory Body in respect of such activities puts into question the political neutrality of the Supervisory Body as such technologies are seen as an attempt at neocolonialism. 9) The work of the Supervisory Body has become unnecessarily protracted because of these contentious issues, and this has impeded the Supervisory Body’s progress in delivering on the CMA mandate. Including such approaches in the Supervisory Body recommendations would risk another rejection by the CMA this year, which would be a serious failure of the Supervisory Body in performing its role. 10) If the Supervisory Body is uncertain of scope of its work, it should seek a clear mandate from the CMA rather than being paralyzed by these out-of-scope issues.	
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	3.1 Monitoring	12	1) Higher tier methods should be required where the default values lead to an “overestimation” of net removals, and not “underestimation” of net removals as stated in the document. 2) Higher tier methods such as the use of measured values should be base case; use of default values should be the additional option allowed to be used where transparent explanation and justification can be provided for this.	Wherever possible, monitoring shall be based on actual measurements. Where measurements are not possible or practical, conservative default values may be used, provided that transparent information and justification are provided for this choice.
		14	1) It is not clear at this point in the document what is meant by “reversal risk assessment tool”. The tool should be defined/introduced prior to its mention, or a forward reference should be made to the relevant paragraph. 2) It is not clear what is meant by “reversal”. For example, if workers in a forest management activity are grilling for their dinner and a fire breaks out burning an area of the newly regenerated forest plantation. Is there a reversal? How much area needs to be affected, with what severity, to qualify as reversal? What if there is bush fire? What if the bushes are as large as small trees? How does one know the area affected or the tonnes emitted without conducting measurements? What threshold of severity of fire will trigger a monitoring? Information on these aspects is lacking in the current document. Our view is that such a requirement is impossible to prescribe, and if prescribed, impossible to apply, and if applied, it will become impossible to implement any removal activities. Finally, we feel that prescribing such requirements will be infructuous and unnecessary work, as we describe elsewhere below.	Logical structure should be followed. First reversal should be defined and then reversal risk and reversal risk assessment should be introduced.

	3.2 Post-crediting period monitoring, reporting, and remediation of reversals	16ff	1) In our understanding, the current recommendation document provides for temporary crediting, similar to the long-term Certified Emission Reductions (ICER) of the Clean Development Mechanism (CDM). We note the following differences between the ICER approach of the CDM and the approach described in the current recommendation document: a) The liability of credit replacement is open-ended in time in the recommendation document since no finite period has been mentioned. The activity participants are required to monitor removal stocks periodically until the issued credits are replaced. Under the A/R CDM rules, the ICERs must be replaced at the end of the crediting period, even if the carbon stocks are intact. Thus, under the CDM, there are no monitoring requirements after the end of the crediting period and the credit replacement is not an open-ended liability. We believe monitoring requirements after the end of the crediting period are unnecessary, unworkable, and unenforceable. b) The replacement liability in the current recommendation is with the seller or the host Party, whereas the liability under the CDM rules is with the buyer. It is not clear how a seller liability for replacement can be enforced, since sellers are not under any regulations that can be invoked to oblige them to replace credits. The buyers are normally entities under emission limits established by law, and they can be required to replace the expired or reversed temporary credits under the same law. In our view the credit replacement requirements in	If temporary credits are to be issued, the A/R CDM rules can be used. However, if fungible credits are to be issued, equivalence approaches could be used. In the submissions and published literature, we find different approaches and methods for ex-post incremental crediting [Ref 18]. We recommend that the SB ask for an expert analysis of these approaches and adopt a method that would best serve the objectives of the mechanism.
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			current recommendation are unworkable. 2) The current recommendation requires contribution to buffer pools which is unnecessary since all credits will eventually get replaced. Buffer pools arrangements described in the recommendation document are extremely complicated, unclear, and unenforceable as described further below. These are also arbitrary, lacking objectivity or clarity in many aspects, without making any meaningful contribution. In our view these requirements are completely unnecessary.	
	3.4. Accounting for removals	27ff	What has been described under this section is not about accounting, rather about quantification of removals. If it is not clear what is meant by “accounting”, the Supervisory Committee should seek clarification from the CMA.	
	3.6. Addressing reversals	32 to 60	1) In our view, this long, complicated, and incomprehensible section does not add any value. Since the credits must be eventually replaced (even though one does not know when), there is no need for buffers. We note the following unaddressed deficiencies in the buffer pool scheme as described in the recommendation document: a) A “buffer pool” does not have any collateral value unless the buffer is made up of non-reversible credits. b) Insurance: no actuarial basis exists for such insurance; it is a hypothetical proposal since no commercial entities can do this at present; over long period of time, the insured or insurer can disappear, judgement-proof cases can arise; who will sue whom, and under what jurisdiction and laws, is not clear.	If temporary credits are to be issued, the A/R CDM rules can be used. However, if fungible credits are to be issued, equivalence approaches could be used. In the submissions and published literature, we find different approaches and methods for ex-post incremental crediting [Ref 18]. We recommend that the SB ask for an expert analysis of these approaches and adopt a method that would best serve the

			c) Host Party liability: governments cannot arbitrarily assume liabilities of private entities; they will need legislation to be enacted for this, which is unlikely to happen in most developing countries; this requirement defeats the objective of the mechanism to “incentivize and facilitate participation by public and private entities”. d) Perpetual monitoring: this is not feasible; it can incur unmanageable costs; lock-in of a land-use over indefinite period goes contrary to efficient resource use, contrary to sustainable development. e) In our view, the buffer pool scheme is the pretext, or the enabler, of upfront issuance of tonne-for-tonne credits. However, upfront issuance of tonne-for-tonne credits goes contrary to the atmospheric interest: the large number of credits being issued upfront, even though making a good commercial case for the market players and being popular with most Voluntary Carbon Market (VCM) players, leads to flooding of the atmosphere with the offsetters’ emissions. It is to be noted that compared to ex-post incremental issuance, upfront tonne-for-tonne issuance leads to overcrediting of up to 400% [Ref 3, page 84] and additional atmospheric warming of up to 600% [Ref 4] for the same implementation of a physical activity.	objectives of the mechanism.
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[2] UNFCCC (2023a) Information note: Compilation of the public inputs on removal activities under the Article 6.4 mechanism. <https://unfccc.int/sites/default/files/resource/a64-sb007-aa-a13.pdf>

- [3] UNFCCC (2023b) Information note: Removal activities under the Article 6.4 mechanism. <https://unfccc.int/sites/default/files/resource/a64-sb005-aa-a09.pdf>
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[19] UNFCCC (2024) See three different websites on the same topic:

a) <https://unfccc.int/process-and-meetings/the-paris-agreement/article-64-mechanism>

b) <https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body>

c) <https://unfccc.int/process/the-paris-agreement/cooperative-implementation>