

Call for public input – Template for input	A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)
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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	4.1	18	It is not appropriate to consider that encouraging ambition is to be done at the “ project activity level ”. It is an activity to be conducted at the policy/regulatory level by the host country. The Methodologies are applied by the project proponents who are investing in activities to generate highest/maximum amount of emission reductions by their investments. The progressive reduction during or at the renewal of crediting period as proposed is likely to be subjective and beyond the control of activity proponents. It may discourage project proponents from undertaking emission reduction activities.	Either drop this provision or require the host country to consider and approve the manner of progressive reduction in emission reductions from project activities registered under each approved methodology under the Article 6.4 Mechanism.

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A01	4.2	24	The paragraph 24 suggests a requirement that the estimation of emission reductions or removals be “conservative”. While respecting its importance, I would like to suggest that this conservative estimation should not compromise “accuracy” of the estimation of ER or removals. To elaborate, if a project activity involves discontinuation of an activity that is permissible under the host countries prevailing laws, regulations and policies prior to its remaining life, but the activity proponent proposes to discontinue it with the soul objective of reducing emissions of GHGs. In such situations, the emission reductions should be counted as those that prevailed during its operative phase. In such activities the conservative estimation of emission reductions should be limited to the minimum annual emissions from the facility being retired, during the past 10 years of its operation. No proxy scenario, e.g., emissions from best performing similar facility in the host country, should be considered for the estimation of ER. Such alternatives in the name of conservatism compromise the accuracy of the emission reduction estimation and act as disincentive for such early retirement.	24. Mechanism methodologies shall contain provisions aimed at the conservative estimation of emission reductions or removals from the measures applied, options chosen, or assumptions made without compromising accuracy, and shall not overestimate the emission reductions or removals from Article 6.4 activities.