	CALL FOR INPUT
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Date of submission	24th of September 2024

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Document reference number and title: A6.4-MEP008-A03. Draft Standard: Addressing non-permanence and reversals (version 02.2)				
Item	**Section no.** (as indicated in the document)	**Paragraph/Table/Figure no.** (as indicated in the document)	**Comment** (including justification for change)	**Proposed change** (including proposed text)
1	Entire document	N.A.	Bellona supports the fact that the Supervisory Body is addressing reversals and non-permanence with this second version of the standard. In particular: - guidance on scientific grounding of post-crediting monitoring provisions. An approach adopting limited liability would be scientifically flawed. A6.4 units would not truly be offsetting emissions on climate-relevant timeframes and safeguards against temporary removals for offsetting. Safeguards against temporary removals in this regard should be designed. - the definition of negligible risk aligned with the IPCC guidelines (probability less than 1%). - This would not mean excluding nature-based projects but keep current provisions based on conservativeness levels proportional to the reversal risk of the activity It would be useful to understand how A6.4 could incorporate a pathway for different removals, with use-cases. Buyers should contribute funding for MRV and share financial responsibility for reversals. We welcome the opportunity for assess the risk assessment tool suggested in the standard.	
2	Appendix 1	Paragraph 9	Against simplifications for materiality threshold granting flexibility to land-sector projects, risking damaging the integrity of the standard.	
3	Appendix 2	Paragraph 44	There are also risk in added flexibility allowing monitoring to be conducted by third parties with any clarification on liability and additional options to terminate post-crediting monitoring periods and termination of activities titled 'de-registration of activities. Only credits with at least the same reversal risks should be eligible for cancelling provisions to terminate an activity.	

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