	CALL FOR INPUT
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Date of submission	24.09.2025

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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	Cover Note, Section 3.2	[14]	We support the MEPs confirmation that comments outside the scope of the Removals Standard and/or that are within scope of other products were not incorporated.	No change
2	Cover Note, Section 3.3	[20]	We do support the concern raised by the one MEP member that land-based activities could be disadvantaged by the applicable rules, if projects do not meet the agreed removal standard. In such cases, these activities would be ineligible to issue Article 6.4ERs or MCUs.	We do not propose a change in text itself, but we recommend explicit recognition that activities that fail to adhere to Article 6 rules should instead be pursued under Article 5 results-based financing. Article 5 was specifically designed to accommodate such activities, thus ensuring these activities can be recognised without undermining the integrity of the Article 6.4 mechanism.
3	Cover Note, Section 3.4.2.	[28]	Referencing the statement: "*This raises the concern that certain types of activities, such as efficient cookstove projects, would otherwise not qualify to register under the mechanism*". The choice to have a pathway-agnostic standard in order to drive fungibility is important. The rules should not be weakened to enable certain pathways. Alternative financing avenues within the Paris Agreement, including Article 5 results-based financing and other climate finance provisions.	We recommend that the standard is built agnostic of its specific application to specific pathways.

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4	Appendix 1.	[3(g)]	We support the MEP recommendation that the Supervisory Body Mechanism has narrowed the recommended range to below 2.5 percent.	This volume should be lower than 2% (ideally 1.5% or below) in order to ensure the mechanisms delivers genuine overall mitigation in global emissions.