



CALL FOR INPUT

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Instruction: **Enter your input in the table below.** Stakeholders **must** submit their comments by the established deadline and strictly use this commenting template to ensure their input is duly considered. The use of AI-generated content is **prohibited**, as such submissions frequently lack relevance and fail to address the specific issues presented in the published documents.

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/Fig ure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	Cover note	9.	The standard proposed applies to varied use case: Per design, use cases span wide and can make for credits purchased for sake of contributions to NDCs, over OIMP to MCUs. Consequentially, a wider set of practices is likely and should be expected. The current MEP mandate echoes what we deem necessary for compensatory credit use cases for emissions of long-lasting emissions of fossil origin especially. However, this specific use case setting a general barrier to PACM markets may result in prohibitively challenging requirements for some activity types that are widely used – in a high integrity and quality way – in today 's market environment. We acknowledge that all climate mitigation has tons of merit and no credible methods should be neglected to achieve the temperature targets set in Paris. We thus welcome further considerations as to how a PACM mechanism could be offering a pathway to market for varied climate solutions, potentially incl. temporary removals. Importantly, we don't understand such pathways as part of the current MEP mandate (e.g. see 3.CMA/3., the current workplan or the Removals Standard agreed by CMA/6). We nevertheless hope for future possibilities to expanding the mandate (first via CMA/SBM approvals/"taking note of's"), as considerations on use cases mentioned above are presenting important additional considerations on how, and why certain activities could merit differing sets of rules and still present meaningful climate action via PACM (e.g. via upcoming reviews in 2028). E.g. a clearer differentiation of credit types based on storage may allow for interesting paths forward: Notably, the the European CRCF certification has successfully evaded thorny discussions via establishing 3 differing credit types for CDR (Carbon farming, products, permanent). Similar differentiation should be tested at the UNFCCC level as long as "non-permanent" CDR is restricted in its use. What restrictions to apply must be further discussed and preferably decided via CMA, as it is rather political choice.	

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2	Cover note 3.4.1	23.	Calculated over a 100-year timeframe: We urge for a higher time horizon of assessment for the following reasons: • Availability of methods: There are existing simulators and modelling tools capable of calculating longer timeframes which are required per default e.g. within the European CCS directive (modelling should cover up to millennia). • Consistent with Glasgow RMPs As per the RMPs agreed in Glasgow (3.CMA/3), activity participants need to be capable of addressing reversals “in full”. Thus, a 100-year timeframe for modelling estimates should be further expanded to capture the impacts of non- permanence “in full”. • Lifetime of CO2 in the atmosphere: (Parts of) Fossil CO2 emissions have been proven to last well beyond 1000 years once in the atmosphere. Compensatory measures, such as carbon credits under PACM, should correspond to such timelines. • Science-basis: ○ Brunner et al. 2024: “Our findings suggest that a CO2 storage period of less than 1000 years is insufficient for neutralizing remaining fossil CO2 emissions under net zero emissions.” ○ AR6 categorizes CDR storage in three distinct categories: decades to centuries, centuries to millennia, 10'000 years+. Minimally use the second category and “centuries” as the defining permanence assessment horizon Clarification request: • Could a 100-year assessment time limit future risk assessment tools in their assessments beyond 100 years? This would create substantial additional work for certain methods that are well accustomed to assessing risks over longer timeframes. Therefore introducing “at least”	[...] as calculated over at least 200 years starting from no earlier than the end of the last active crediting period for an activity.
3	Cover note 3.4.1. (Appendix 1 footnote 15)	23.	The implications of the Draft reversal standard are hard to understand without obtaining the risk assessment tool (RAT). Future iterations should consult on both documents in parallel, as the impact of this standard is heavily defined via the RAT and vice-versa.	

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4	Appendix 1, 2 Definitions	3(g)	1 percent as suggested by the MEP and calculated over at least 200 years...	A risk of reversal that would result in a loss of no more than one percent of all the A6.4ERs issued with respect to the total emission reductions and/or net removals achieved by the activity during its active crediting period, calculated over at least 200- years timeframe starting from no earlier than the end of the last active crediting period;
5	Appendix 1, 2 Definitions	3(i)	Clarification: Is the intention to limit the post-crediting monitoring period to 100years? If yes, why not address this in the definition here. (E.g. based on a precedent set within the Californian CCS protocol, page 15, item (90) here). At the same time, section 3.2.2. of A2 introduces the minimum post-crediting monitoring period which is defined at the activity mechanism methodology.	
6	Appendix 1, 3 Applicability	5.	Good addition	
7	Appendix 1, 3 Applicability	7.	Clearer categorization of excluded activities is encouraged. The MEP (and/or SBM) should dynamically operate a list of clearly defined excluded activities. We encourage seeking for a mandate to do the task in such a way, rather than setting principles which are not unambiguous in their applicability to individual projects. The mandate should allow the MEP and/or SBM to operate a list in a flexible and simple manner, including pathways for input received by a wider public. This also becomes relevant for proposals concerning policy crediting	

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