



## CALL FOR INPUT

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|-----------------------------------------------|---------------------------------|
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| Date of submission                            | 24/09/2025                      |

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: <b>A6.4-MEP008-A03. Draft Standard: Addressing non-permanence and reversals (version 02.2)</b> |                                               |                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                    |
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| Item                                                                                                                                | Section no.<br>(as indicated in the document) | Paragraph/Table/Figure no.<br>(as indicated in the document) | Comment<br>(including justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Proposed change<br>(including proposed text)       |
| 1                                                                                                                                   | Cover note, Section 3                         | Paragraph 15 (c)                                             | <p>We respectfully disagree with the MEP's conclusion that the Removals Standard (paras. 26 and 28) requires indefinite post-crediting monitoring. Neither paragraph specifies that monitoring must continue indefinitely. Paragraph 26 states only that "monitoring shall continue after the end of the last active crediting period." Paragraph 28 provides a mechanism for activity participants to request termination of post-crediting monitoring if they can demonstrate negligible risk of reversal or provide remediation.</p> <p>These provisions leave open the possibility of defining (1) an indefinite period or (2) a fixed monitoring period. For example, monitoring could be required for 40 years after the last active crediting period. During that period (40 years), activity participants could request termination under paragraph 28 by demonstrating that stored GHGs are at negligible risk of reversal.</p> | The SBM should consider a fixed monitoring period. |

| Item | Section no.<br>(as indicated in the document)                    | Paragraph/Table/Figure no.<br>(as indicated in the document) | Comment<br>(including justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Proposed change<br>(including proposed text)                                                                                                                                                                                                                                                                                                                                     |
|------|------------------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3    | Appendix 1, Section 2<br><br>Cover Note, Section 3, paragraph 24 | Paragraph 3 (g)                                              | <p>On the definition of “negligible risk of reversals,” the MEP suggested in the cover note (section 3, paragraph 24) a range between 0.5% and 2.5% over a 100 year time period. This range is quite narrow and conservative, and appears disconnected from climate science. The IPCC acknowledges multiple atmospheric lifetimes of carbon dioxide: “The adjustment time of CO<sub>2</sub> in the atmosphere is determined from the rates of removal of carbon by a range of processes with time scales from months to hundreds of thousands of years. As a result, 15 to 40% of an emitted CO<sub>2</sub> pulse will remain in the atmosphere longer than 1,000 years, 10 to 25% will remain about ten thousand years, and the rest will be removed over several hundred thousand years.” (<a href="#">Climate Change 2021: The Physical Science Basis</a>) It is thus unclear why the risk of reversal should be estimated over a 100 year time period; a significant percentage of the carbon dioxide leaves the atmosphere within 40 years, for example.</p> <p>As the MEP notes in paragraph 27, this is a normative policy decision rather than a purely scientific one. We suggest that the Supervisory Body allow more time and flexibility to take into account the evolving scientific evidence and, in the meantime, adopt a broader range that can accommodate the most durable forest projects. This would ensure that the negligible risk option is both scientifically credible and practically implementable.</p> | The SBM should request the MEP to conduct further research to provide a definition of negligible risk of reversals, as to understand the impact of different time horizons and confidence intervals in the negligible risk of reversals test. This assessment must be carried out with wide public stakeholder input and relying on external scientific and technical expertise. |

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