



## CALL FOR INPUT

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|-----------------------------------------------|--------------------------------------|
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| Date of submission                            | September 24, 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                                                                                                                                   | Section 3                                     | 17.a                                                         | <p><b><i>“The MEP notes that the proposed standard is only applicable to projects and that the Supervisory Body has requested the MEP to work on a concept note on largescale crediting programmes.”</i></b></p> <p>It is critical that SBM clarify the scope of preparing the large-scale programme concept note. During the consultation process for the non-permanence and reversal draft standard, numerous comments flagged that the current provisions are not applicable or practicable for large-scale programmes. This could also happen for other standards/tools already adopted such as the leakage and baseline standards.</p> | <p>Add.</p> <p>.... The MEP will incorporate these comments when preparing the large-scale programme concept note, together with revised versions of the leakage, baseline, removals, and other relevant standards or tools, to ensure their suitability for large-scale projects.</p> |

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| 2    | Section 3.3                                   | 19 and 20                                                    | <p><b><i>“a single solution could be applicable to all types of Article 6.4 activities that are subject to reversal risks”</i></b></p> <p>Implementing one non-permanence and reversals standard for various CDR types is controversial because Engineered Solutions like direct air capture with carbon storage (DACCS) and carbon capture and storage (CCS) have very different carbon storage durability compared to <b>Nature Climate Solutions</b> such as forest restoration or soil carbon enhancement.</p> <p>The requirements outlined in the current draft may be suitable for engineered solutions, which can provide carbon storage for thousands of years. However, these same requirements could inadvertently exclude nature-based climate solutions, whose carbon storage duration generally lasts from 20 to more than 100 years as part of climate action efforts.</p> <p><b><i>“A member of the MEP requests that the Supervisory Body consider concerns that the draft standard would preclude participation by land-based activities due to the required consistency with the Removals Standard for the reasons listed below and believes that amendments to the Removals Standard would allow more equal participation opportunity to both technological and land-based activity types without lessening the credibility of the outcome.”</i></b></p> | <p><b>In the report of the SBM18 the following should be included:</b></p> <p>Defer discussion of the draft non-permanence and reversal standard until amendments to the Removal Standard are made. This approach allows MEP to establish a non-permanence standard that recognizes variances in durability among activities exposed to reversal risks and ensures that Nature Climate Solutions are not excluded from participation by the standard's requirements.</p> <p>The Supervisory Body request the MEP to draft an amendment to the Removals Standard. This amendment should enable Nature-based Solutions to participate more equally, while maintaining the standard's credibility.</p> <p>In addition, SB requests that the MEP establish differentiated threshold values for Nature-based Solutions and clear criteria to demonstrate when the risk of reversals is negligible. This will allow Nature Climate Solutions project implementers to apply for exemptions from post-crediting monitoring requirements. SB also requests the development of a Reversal Risk Assessment Tool applicable to Nature Climate Solutions activities.</p> |
| 3    | Appendix 1, Section 2                         | 3g                                                           | <p><b>Negligible risk of reversal:</b> The SB's normative policy decision on negligible risk has significant potential impacts on the mechanism. Further research is needed to define negligible risk and understand its implications for different time horizons and confidence intervals.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <p><b>Including proposed text for 3g. Negligible risk of reversal:</b></p> <p><i>“The definition of 'negligible risk of reversal' shall be further elaborated by the MEP to ensure it considers different time horizons and confidence intervals.”</i></p> <p><b>In the report of the SBM18 the following should be included:</b></p> <p>The SB requests the MEP to conduct additional research to establish a definition for 'negligible risk of reversals.' This should include evaluating the impact of various time horizons and confidence intervals on the test. The assessment must involve extensive public stakeholder engagement and utilize external scientific and technical expertise.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4    | Appendix 1, Section 6.5                       | 31                                                           | <p><b>A6.4ER contributions to the Reversal Risk Buffer Pool Account</b></p> <p>The Risk Assessment tool and concept note on remedial actions are unavailable for public input, hindering understanding of the draft standard's implications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <p><b>In the report of the SBM18 the following should be included:</b></p> <p>The reversal assessment tool and remedial action concept note, to be developed by the MEP, must incorporate established best practices for nature-based climate solutions. Additionally, they should undergo a comprehensive consultation process to secure public input prior to approval, given their potentially significant implications.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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| 5    | Appendix 1, Section 6.6                       | 33                                                           | <b>A6.4ER contributions to the Adaptation Fund</b><br>To minimize the impact on the A6.4ER available for transfer within the project, contributions to the Adaptation Fund should be made only after deducting the Reversal Risk Buffer.                                                                            | Make contributions to the Adaptation Fund after deducting the Reversal Risk Buffer from the A6.4ER.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6    | Appendix 1, Section 6.7                       | 35                                                           | <b>A6.4ER contributions to overall mitigation in global emissions</b><br>To minimize the impact on the A6.4ER available for transfer within the project, contributions to the OMGE should be made only after deducting the Reversal Risk Buffer.                                                                    | Make contributions to the OMGE after deducting the Reversal Risk Buffer from the A6.4ER.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 8    | Appendix 2, Section 1.3                       | 12                                                           | <b>Annual Reversal Report</b>                                                                                                                                                                                                                                                                                       | <b>Including proposed text for Section 1.3, p12</b><br><b>Section 1.3 Reversal Report</b> (Replace “Annual reversal report” with “Reversal report”, throughout the document.)<br><i>12. Activity participants shall submit to the secretariat, a reversal report that indicates whether, at any point in the previous calendar years, any observed events involving the release of stored greenhouse gases that could potentially lead to a reversal. This report will be presented every 1 to 5 years.</i>                                                                                                                                                                                                                                                                                                                                                                               |
| 9    | Appendix 2, Section 3.1                       | 40                                                           | <b>Indefinite post crediting monitoring period:</b> Nowhere in the Removal Standard the text was decided that post-crediting monitoring would be indefinite.<br><br>Indefinite post-crediting monitoring periods for GHG mitigation activities are not aligned with best practices and could delay climate finance. | <b>Including proposed text for Appendix 2, para 40.</b><br><i>40. The post-crediting monitoring period shall start on the first day after the end of the last active crediting period. The post-crediting monitoring period shall continue <b>for a maximum period of X years</b>, or until one of the conditions in section 3.2 is satisfied, whichever happens first.</i><br><br><b>In the report of the SBM18 the following should be included:</b><br>The SB asks the MEP to recommend a maximum post-monitoring period based on the latest science and best practices already developed for Nature-based Climatic Solutions and to analyse how PACM and SBM decisions relate to the Paris Agreement’s scope. As the Agreement targets emissions balance in the second half of this century (Art. 4.1), obligations past 2100 may be void, enabling a fixed end date for liabilities. |

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| 10   | Appendix 2, Section 3.2.2                     | 46                                                           | <p><b>Indefinite post crediting monitoring period:</b> Nowhere in the Removal Standard the text was decided that post-crediting monitoring would be indefinite.</p> <p>Indefinite post-crediting monitoring periods for GHG mitigation activities are not aligned with best practices and could delay climate finance.</p>                                                                                                                                                                                                                                                                                                                                  | <p><b>Including proposed text for Appendix 2, para 46.</b></p> <p>46. At any time after the minimum post-crediting monitoring period defined in an activity's mechanism methodology has elapsed, <b>and before the maximum of X years post-crediting monitoring have concluded</b>, activity participants may submit, through a DOE, a request to the Supervisory Body to terminate post-crediting period monitoring and reporting, accompanied by a verification of the conditions and information required. The request shall demonstrate that:</p> <p>(a) The stored greenhouse gases, or precursors of greenhouse gases, are at a negligible risk of reversal, as defined in paragraph 3(g) of Appendix 1, starting from the year of submission of the request; and</p> <p>(b) All conditions or criteria set in the mechanism methodology for termination of post-crediting period monitoring have been fulfilled.</p> |
| 11   | Appendix 2, Section 3.2.2                     | 47                                                           | <p>There is not an equation to illustrate the calculation of the maximum percentage loss (MPL) of emissions and/or net removals for which A6.4ERs.</p> <p>It is not clear if the MPL considers the ERs allocated to the Reversal Buffer. Allocating enough to the Reversal Buffer ensures that losses from issued A6.4ERs do not exceed a set threshold. The higher the unavoidable risk, the more the Reversal Buffer must be allocated to compensate.</p> <p>Additionally, it is important to clarify whether the negligible risk of reversal is assessed solely based on avoidable reversals or if it also takes unavoidable reversals into account.</p> | <p>Include an equation to illustrate the calculation of the maximum percentage loss (MPL) of emissions and/or net removals for which A6.4ERs.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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Table 1: Comparison of key requirements under the TREES standard and Article 6.4 for Nature Climate Solutions.

| Standard                                                                 | Requirement                                            | TREES Standard for REDD+ programs                                                                 | Art 6.4 – Nature Climate Solutions - NCS                                                                      |
|--------------------------------------------------------------------------|--------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
| Setting the baseline in mechanism methodologies A6.4-STAN-METH-004       | Zero baseline                                          | Yes – Zero baseline for natural forest regeneration.                                              | No                                                                                                            |
|                                                                          | Historical Baseline Adjustment / Uncertainty deduction | Yes – Uncertainty deduction                                                                       | Yes – Historical Baseline Adjustment                                                                          |
|                                                                          | Increasing downward adjustment                         | Yes – Recalculation of the baseline every five years                                              | Yes – 1% annual increase in downward adjustment.                                                              |
|                                                                          | Avoidance of double counting                           | Yes                                                                                               | Yes                                                                                                           |
| Draft Standard. Addressing non-permanence and reversals A6.4-MEP008-A03. | Crediting deficit                                      | Yes – Removals cannot be claimed unless there is demonstrated performance in emission reductions. | Yes. A crediting deficit occurs when storage increases are less than emissions increases.                     |
|                                                                          | Reversal Risk Buffer Pool                              | Yes – A model is employed to determine the buffer fraction.                                       | Yes – The fraction will be determined by the reversal risk assessment tool, which has not yet been developed. |
|                                                                          | Contributions to the Adaptation Fund                   | No                                                                                                | Yes – 0% for LDCs and SIDs and 5% for all other host countries.                                               |
|                                                                          | Contribution to overall mitigation in global emissions | No                                                                                                | Yes – Minimum 2%                                                                                              |
|                                                                          | Indefinite post crediting monitoring                   | No                                                                                                | Yes                                                                                                           |

| Parameter                                                                                                                                                                                                                                                                | Engineered Solutions                                                                                                                                                                                                                                   | Nature Climate Solutions                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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| <b>Carbon Dioxide Removal activity type</b>                                                                                                                                                                                                                              | Direct Air Capture and Carbon Storage<br>Carbon Capture Storage                                                                                                                                                                                        | Forest restoration<br>Soil carbon enhancement<br>Avoided ecosystem conversion                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Scale-readiness</b> – the potential annual volume of emissions that can be avoided or removed, considering feasibility, safety and cost.                                                                                                                              | <b>Currently limited to very small scales</b> (0.01 megatons yr <sup>-1</sup> ) ( <a href="#">International Energy Agency [IEA], 2022</a> ) due to cost, energy requirements, and infrastructure constraints.                                          | <b>Offer gigatonne-scale mitigation potential today.</b> The IPCC's 6th Assessment Report, WGIII, is the global gold standard in scientific consensus. <a href="#">Table SPM-7</a> identifies 38 Gt of higher confidence cost-effective global mitigation options. 11 Gt of the 38 are from natural climate solutions (called AFOLU by IPCC), including both reduction approaches (e.g., stopping deforestation) and removal approaches (e.g., reforestation). |
| <b>Durability</b> – the time horizon over which a tonne of CO <sub>2</sub> remains sequestered or avoided.                                                                                                                                                               | may offer storage on the order of millennia—although research shows this is not necessarily guaranteed ( <a href="#">Larkin <i>et al.</i> 2019</a> ; <a href="#">Lane, Greig, &amp; Garnett, 2021</a> ; <a href="#">Mahjour &amp; Faroughi, 2023</a> ) | Ranging from 20 to 100+ years ( <a href="#">Streck <i>et al.</i> 2025</a> ).                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Negligible Risk of Reversals</b> – maximum percentage loss of the emission reductions and/or net removals for which A6.4ERs have been issued, as calculated over 100 years starting from no earlier than the end of the last active crediting period for an activity. |                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

-- (Please add rows as required) -