



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/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	Whole document	NA	Thank you for the opportunity to comment. As a generic comment, I am very concerned that despite the many submissions which were critical of the first draft, this second draft only includes minimal changes. In its current form, the draft will in effect discourage all carbon projects involving forests, soil and also blue carbon, due to the rules enforcing perpetual liability and overly onerous monitoring and reporting requirements. Open-ended requirements such as this are not in line with good governance principles. Framing "permanence" as a binary threshold ignores science around CO2 permanence in the atmosphere. It would be more appropriate from a climate perspective to consider CDR options in durability terms, accepting that different solutions offer different storage timeframes and risks of reversal. In its current form the draft is likely to lead to perverse environmental outcomes, driving deforestation and more emissions. Finally I consider this document to be poorly written, with use of language inconsistent with Standard requirements and hard to follow, with several instances of unnecessary content.	For a new draft that meaningfully addresses the fundamental issues of the definition of negligible risk, perpetual liability, monitoring and reporting requirements

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3				
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