A6.4-SB005-AA-A10

Information note

Summary of the views submitted by Parties and observers on activities involving removals

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United Nations
Framework Convention on
Climate Change

COVER NOTE

1. Procedural background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), by its decision 7/CMA.4, invited Parties and admitted observer organizations to submit, via the submission portal, by 15 March 2023, their views on activities involving removals, including appropriate monitoring, reporting, accounting for removals and crediting periods, addressing reversals, avoidance of leakage, and avoidance of other negative environmental and social impacts.

2. The CMA requested the Supervisory Body of the mechanism established by Article 6, paragraph 4, of the Paris Agreement (the Supervisory Body), to take into account the views of Parties and observers in the preparation and further development of recommendations on activities involving removals.

3. The Supervisory Body, at its fourth meeting (7–10 March 2023),[1] requested the secretariat to prepare a summary of the views submitted by Parties and observers in response to the call for submissions launched by the CMA.

2. Purpose

4. This information note contains a summary of the submissions made by Parties and observers in response to the call for submissions issued by the CMA.

3. Key issues and proposed solutions

5. The main issues raised by Parties and observers in their submissions are summarized in this information note. The information contained in this note has also been taken into account in updating the information note on activities involving removals, which is being considered separately by the Supervisory Body.

4. Impacts

6. This document will facilitate the consideration by the Supervisory Body of the views of Parties and observers on removal activities in the course of its work on removal activities pursuant to decision 3/CMA.3, paragraph 6(c).

5. Subsequent work and timelines

7. No further work is anticipated in this regard.

6. Recommendations to the Supervisory Body

8. It is recommended that the Supervisory Body take note of the summary of submissions contained in this information note.

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[1] The meeting report of the fourth meeting of the Supervisory Body (SB004) is available at: https://unfccc.int/sites/default/files/resource/a64-sb004.pdf.

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1. Introduction

1. This note provides a summary of the views submitted by Parties and observers in response to the call for submissions issued by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA) in decision 7/CMA.4, paragraph 19.

2. The call for submissions was open until 15 March 2023 via the submission portal.

3. A total of 32 respondents submitted their views, including late submissions received up to 10 May 2023. Table 1 summarizes the number of submissions by category.

Table 1. Number of submissions received by category

Category	Number of submissions
Parties and groups of Parties	5
United Nations system bodies	1
Admitted non-governmental organizations	20
Non-admitted entities	7

4. The full list of submissions can be found in the appendix to this note.

2. Summary of views

5. The following sections summarize the views expressed in the submissions.

2.1. General comments

6. Submissions emphasized that enhanced removals cannot be used to postpone the deep emissions cuts needed in the short term. Doing so would lock in higher emissions pathways that would accelerate climate change, including through dangerous feedback loops, and could reduce our ability to achieve removals in the future [1].

7. Moreover, some submitters [3] urged the Supervisory Body to focus its efforts on emission reductions and not removals. Arguing that focusing on reductions is also far simpler, methodologically and if removals fail, either immediately or later due to problems in permanent storage, this creates a major problem for the mechanism as it will be too late to undo the emissions that were allowed via an offset purchase [10], [17]. Removals are not reductions, and relying on them delays immediate reduction of emissions while also threatening the environment and human rights, including Indigenous Peoples' rights, land rights, the rights to food, water, health and culture, and the right to a healthy environment [5]. Another submitter expressed the view that removals are fundamentally different from reductions and should not be treated as interchangeable [10, 13, 21, 25, 30]. A submitter [3] proposed to the Supervisory Body to focus its efforts on facilitating rights-based action to reduce emissions, including by establishing a robust and participatory governance framework under Article 6.4. This would align with States' human rights obligations and their commitments under the Paris Agreement.

8. Input received suggested that eligibility of a removal method should be based on whether a method results in a permanent net removal of carbon dioxide (CO_2) from the atmosphere. For the eligibility of a specific removal activity of any type—engineered or biologic—guardrail regulations can be used to define storage permanence, sustainability criteria and community engagement, and avoid indirect and inequitable impacts [4]. It was suggested that the eligibility could include any activities involving an anthropogenic enhancement of removals [1]. Nature-based removals can play a particularly important role in near-term action, not only for their mitigation benefits, but also for their ability to enhance adaptation and resilience, as they can provide additional environmental and social benefits. Therefore, submitters are of the view that they must not be overlooked or excluded as the Supervisory Body develops its recommendations. These activities include restoring tree cover, improving forest management, enhancing soil carbon sequestration in croplands and grasslands, and protecting and restoring peatlands and coastal wetlands, among other methods [20]. Further views discuss the potential for enhanced carbon sequestration in agricultural soils [29].

9. Other submitters disagree, recalling the special characteristics of land as fundamental to human rights, particularly the right to food and land rights. The rights of Indigenous Peoples related to their lands are also essential to protect, including the right to free, prior and informed consent. They are of the view that while land-based interventions are essential to combating climate change, strengthening social-ecological resilience and improving sustainability outcomes, such actions are wholly inappropriate for an offset mechanism [10]. Conservation enhancement activities are important because their co-benefits support the restoration of ecosystems that is crucial to preventing and perhaps even reversing to a small extent biodiversity erosion and build climate resilience. However, conservation enhancement activities have measurement parameters more complex than those of a carbon metric and are hence a poor fit for crediting within the Article 6.4 mechanism [13].

10. A submission mentioned that it is important that recommendations are commercially feasible to attract investment from the private sector. In order to significantly scale up removal activities to help us achieve the temperature goals of the Paris Agreement, large amounts of finance need to be channelled from the private sector into both land-based and engineering-based removals in the coming years [11]. Direct air capture (DAC) is currently expensive. The inherent paradox is that “cheaper” natural removals are likely to get more expensive over time, while more technologically driven removals will likely become cheaper. DAC in 2011 was estimated to cost USD 600–1,000/tonne of carbon captured. For context, nature-based carbon mitigation and abatement solutions cost USD 1.00–40.00/tonne today. At first glance this makes technical removal solutions appear economically nonsensical. However, the paradox of removals technology is that as a young technology (measured in functional installed capacity), its cost today requires consideration relative to future scale [24]. Bioenergy with carbon capture and storage (BECCS) is unique in its ability to deliver dispatchable renewable power and remove carbon from the atmosphere simultaneously. The Article 6.4 mechanism is a critical opportunity to scale BECCS and incentivize long-term storage of CO_2 [27].

11. However, researchers at Lancaster University make clear that this is not just about cost, although that is certainly significant. Offsetting and its potential in the future provide governments, businesses and individuals with a way to avoid challenging decisions about deeper emission reductions. Carbon storage in land as a means to “offset” CO_2 emissions from burning fossil fuels is scientifically flawed [26].

12. Several submitters expressed concerns that many potential removal activities, such as DAC or BECCS, are technologically unproven, especially at scale, and pose considerable environmental and social risks [3, 5, 6, 17, 21, 25, 26, 30]. On the other hand, submitters highlighted the significant efforts to upscale direct air capture with carbon storage (DACCS) and BECCS have recently been launched by global governments and commercial entities, and the technologies are in rapid development [16]. Other submitters urged the Supervisory Body to recognize how much methane could be removed from the atmosphere by a number of nascent technologies [15].

13. The United Nations Framework Convention on Climate Change and bodies created under it should not overstep decisions taken in other international fora, but rather should take note of those processes and refrain from sanctioning activities prohibited or regulated elsewhere (e.g. marine geoengineering, which is regulated by the London Protocol to the London Convention). Additionally, geoengineering has been discussed under the Convention on Biological Diversity for more than a decade, resulting in the adoption of a moratorium on ocean fertilization in 2008 and a de facto moratorium on all geoengineering activities in 2010 [5, 10, 14].

14. However, concerning some site-specific blue carbon activities in well-studied and comprehensively-monitored coastal ecosystems, the science may be robust enough. Coastal blue carbon ecosystems – such as mangroves, seagrasses and tidal marshes – sequester and store globally significant quantities of carbon in their biomass and underlying soils, which can be released if these ecosystems are disturbed by anthropogenic activities. In addition to climate mitigation benefits, these ecosystems provide a multitude of other services, including resilience to climate change impacts (e.g. extreme weather events, coastal erosion and sea-level rise), marine habitats conservation and biodiversity benefits. Coastal and marine nature-based solutions have a particularly high potential for harnessing synergies across mitigation, adaptation and resilience efforts, as blue carbon ecosystems often play a significant role in coastal adaptation and resilience for coastal communities, along with their mitigation potential [12].

15. A submitter [19] called for an internationally agreed code of conduct for scientific research into ocean carbon dioxide removal (OCDR), and indicated that appropriate governance of OCDR applications is required.

2.2. Monitoring

16. In monitoring and compensating for reversals, a first important question is for how long reversals should be monitored and compensated for. Ideally, emission reductions or enhancement of removals should last indefinitely to keep global emissions within a carbon budget compatible with limiting global warming to 1.5 °C. In practice, however, no risk can be insured against in perpetuity, including reversal risks. If significant reversals were to occur later on that would not be compensated for, this could constitute significant risks for the climate system. From an economic perspective, it is also important to set incentives for long-term storage, as this ensures that the cost of preserving carbon stocks is adequately reflected in the prices of carbon credits and that the costs are not externalized to society. We therefore believe that the Supervisory Body should define a minimum long-time horizon over which any reversals must be monitored and compensated for, beyond the combined crediting periods of 45 years, acknowledging the need for more complex domestic solutions as the responsibility cannot be held by the activity participants only. Further assessment should be carried out on how long monitoring and compensation

should be required, and how this can be reconciled with company and country responsibilities. We further recommend that this time horizon be defined as the period in which monitoring, and compensation must continue after the vintage of the Article 6.4 mechanism emission reductions. For example, if monitoring and compensation must be conducted for X years, and Article 6.4 emission reductions or removals occurred in the year 2024, monitoring and compensation should take place until the year 2024 + X [1].

17. This monitoring can and should be conducted in conjunction with people in the project area and third-party monitoring: monitoring should not only be done by project proponents, but also by third parties to provide independent verification [10].

18. Some inputs suggest the adoption of digital monitoring, reporting and verification (dMRV) systems to streamline the process and increase transparency. Digital MRV can enhance data collection, management, and reporting, leading to more efficient and reliable verification of carbon removal activities under Article 6.4.[32]

2.3. Reporting

19. In the case of land-based removal activities, it must be ensured that there are no overlaps with other activities or programmes that are already being developed within its boundaries to avoid different types of double-counting [2]. The submitter suggested the following general guidelines for the adequate methodological development of REDD+ under the Article 6.4 mechanism:

    (a) REDD+ activities under the Article 6.4 mechanism must be developed using the national definition of forest as used in the forest reference level/forest reference emission level;

    (b) A methodological approach that does not lead to an overestimation of the baseline emissions of the projects should be adopted;

    (c) The country nesting approach (when appropriate) should be respected to avoid overestimation and underestimation of the mitigation outcomes from implementing REDD+ at different levels;

    (d) Formulation and implementation of REDD+ activities must comply with national MRV rules, methodologies, and systems in order to ensure consistency in the emissions and removals accounting towards national and international mitigation purposes;

    (e) There must be consistency between the baselines of the activities and programmes developed at different levels, especially in cases when the country has reference levels, considering that, at the same time, those reference levels should be consistent with the national greenhouse gas (GHG) inventories, in accordance with the Warsaw Framework for REDD+ rules;

    (f) Methodological approaches adopted for REDD+ must comply with the national interpretation of the Cancun safeguards [2], [20].

20. Reporting must be transparent. All reports should be publicly available; at a minimum they should be on the Article 6.4 mechanism's website. Some inputs suggest that reporting rules on safeguards and sustainable development should be aligned with the rule-making process on sustainable development by the Supervisory Body [28]. Additionally, they

should be easily accessible, including, for example, that they should be readable on mobile devices as well as computers, in multiple languages including in the languages of the area in which the activity is taking place, and easy to find. Reports also should be made available in the local area directly [5], [6]. Monitoring should not be carried out by the participants of the removal activity alone but should be independently verified by third parties [6].

2.4. Accounting for removals

21. Regarding the accounting for removals, a submitter [2] expressed the importance of adopting or accepting approaches for the accounting in a way that is consistent with the net-zero goal under the Paris Agreement.

22. Long-term storage of carbon in geological reservoirs or in long-lived products should be eligible, whereas storage in short-lived products should not. Activities with very high reversal risks (e.g. certain practices to enhance soil carbon) or activities where reversal risks are very uncertain (e.g. storage in oceans) should not be eligible. Moreover, reversal risks must be appropriately addressed. To ensure that host Party action is not undermined, it is important that mitigation outcomes, including removals, be shared between the host country and the users of the Article 6.4 emission reductions. Some technologies, such as ocean-based removals, are not mature enough and may pose significant environmental risks. These technologies would require further research before they should be considered under Article 6.4:

    (a) Increasing the natural uptake of carbon in biogenic reservoirs: This may include living biomass, dead organic matter, soil organic carbon and harvested wood products (Intergovernmental Panel on Climate Change (IPCC) pools). It may involve different types of activities, such as afforestation/reforestation or restoration of degraded ecosystems. The extent to which carbon pools may qualify to generate credits under Article 6.4 needs to be carefully assessed;

    (b) Long-term storage of carbon in geological or other non-biogenic reservoirs: This may include, inter alia, DACCS, BECCS, storage of carbon in products, or enhanced weathering. The submitter believes that most of these matters should primarily be addressed in broad general guidance, applicable to both the enhancement of removals and reduction of emissions. This holds for monitoring, reporting and accounting, for addressing reversals, for addressing leakage, and for the avoidance of negative environmental and social impacts [1].

23. The proposal of tonne-year crediting has been the subject of consultation and consideration in other crediting programmes, with limited adoption and significant debate over the methodologies used. Unresolved issues include divergence on timeframes, equivalency ratios and discount rates [11]. Other submitters [4, 18] argued that accounting of removals must be based on a foundation of physical climate science rather than stylized financial modelling. He urged the Supervisory Body not to pursue the tonne-year concept as it does not reflect the physical reality of removals.

24. There has been for some time a general agreement that long cycle geological carbon emissions cannot be offset physically by short cycle biogenic removals on a one-to-on ratio. Furthermore, ecosystem restoration restores the land sink, but does not have additional capacity to compensate for fossil emissions. However, IPCC consensus and other scientific research to quantify the asymmetry is recent. Analysis of the consequence

of that asymmetry for accounting for removals and crediting periods is likewise recent. The Supervisory Body's recommendation to the CMA on accounting for removals and crediting periods should derive from the climate warming potential asymmetry between fossil fuel-related emissions and land-based offsets [13].

25. Furthermore, research shows that when forests become more commercially attractive through carbon offset markets, there is a tendency for forest tenure and access rights to shift from women to men. In addition, the use of carbon offsets and market-based schemes usually shift the burden and responsibility to the Global South and are forms of green and carbon colonialism, and the commercialization of nature [8].

26. Article 6.4 mechanism emission reductions (A6.4ERs) issued to removal activities should be well-aligned with the way in which the same activity is recorded in the national GHG inventory of the host Party(ies). A robust accounting framework means that the transfers of A6.4 removal credits between Parties, any related corresponding adjustments, and the stocktake of progress against nationally determined contributions should all seamlessly fit together [11].

27. Robust accounting requires considerations for geological storage, where significant guidance is available in the "Modalities and procedures for carbon dioxide capture and storage in geological formations as clean development mechanism project activities" under the CDM and "IPCC GHG Inventory Guideline 2006 Vol 2 Energy", Chapter 5: Carbon Dioxide Transport, Injection and Geological Storage"[7].

28. Another submitter disagreed, stating that accounting rules cannot overcome fundamental issues. None of the approaches to address the non-permanence issue of land-based removals have worked in the past. Therefore, land-based offsets/removals should not be proposed. Non-permanence rightly remains a barrier to fungibility between the land-use sector and energy sector [14].

2.5. Crediting period

29. Input on the crediting period suggests that a flexible approach could be followed, depending on the type of removal activities. For some cases, longer crediting periods may be considered [28].

2.6. Addressing reversals

30. Using the outcome of the risk assessment to determine the stringency of the measures to prevent and compensate for reversals, such as (i) excluding mitigation activities with high reversal risks from eligibility under the Article 6.4 mechanism; or (ii) using the results from the risk assessment for determining the share of Article 6.4 emission reductions that must be set aside in a pooled buffer reserve, with higher shares for mitigation activities with higher reversal risks can help address reversal risks [1].

31. It is important that all types of reversals are compensated for, including intentional reversals or unintentional reversals (e.g. wildfires and seepages from geological reservoirs). A key design question of any compensation approach is which countries or entities should assume the responsibility for compensating for any reversals. Generally, liability is best placed on those entities that can best influence the risk. The mitigation activity proponents should be the primary responsible entity for compensating for reversals (or at least for intentional reversals). This also addresses moral hazard issues that may

occur if other entities would be the primary responsible entity. Having only a responsibility for mitigation activity proponents is, however, not sufficient, as private or public entities could go bankrupt or it may not be possible for the Supervisory Body to legally enforce obligations upon them. Moreover, in the case of catastrophic unintentional reversals, such as wildfires burning large amounts of biomass or earthquakes breaching the seal integrity of a geological CO_2 reservoir, the mitigation activity proponents may not be able to compensate for the reversals. Therefore, there should be appropriate backstops for compensating for reversals. A diversification of compensation responsibilities can also reduce the risk for all entities involved in the Article 6.4 mitigation activity. We recommend specifically that the Supervisory Body:

(a) Require mitigation activity proponents to sign legally enforceable agreements in which they commit to monitoring the relevant carbon stocks for the required time horizon and compensating for any reversals;

(b) Establish a pooled buffer reserve to which all mitigation activities with material reversal risks must contribute (except if they opt for temporary crediting), noting that it is important that the pooled buffer reserve will be sufficiently capitalized in the light of the reversal risks of the mitigation activities;

(c) Allow, as a complementary means, States to assume the responsibility for compensating for reversals (similar to the clean development mechanism carbon capture and storage (CCS) rules), in which case a lower contribution to the pooled buffer reserve may be applicable;

(d) Allow, as a complementary means to the above measures, insurance companies to cover the risks for mitigation activity proponents to compensate for reversals, in which case a lower contribution to the pooled buffer reserve may be applicable [1].

32. On reversals, decision 10/CMP.7, as well as the European Union Emissions Trading System and other mechanisms, requires the surrender of allowances equal to that of any reversal, and this is widely accepted [23].

33. As monitoring techniques and technologies continue to evolve, some activities may become easier to credit with high levels of confidence. Credible standards require projects and programmes to report on reversals and require compensation for all types of reversals by either the carbon crediting programme or the mitigation activity developer through the cancellation of other carbon market units. This can be achieved through landowner liability, pooled or non-pooled buffer reserves, and/or insurance. In addition, credits held in a buffer reserve at the end of a programme's monitoring period should be cancelled [20].

34. While different activities can achieve CO_2 removal, they will involve different storage timeframes and risks of storage reversal. For example, storage in products and carbon farming activities will typically store CO_2 out of the atmosphere for decades to centuries; while storage of CO_2 in geological reservoirs offers the opportunity to safely store CO_2 for thousands of years. The different timescales and reversal risks associated with the different activities should be reported, ensuring that the market is able to differentiate them (and price them accordingly), recognizing the value of geological storage [9]. One input suggests that a standard permanence period should be defined. [28]

35. Reversals in CCS, carbon capture, utilization and storage (CCUS) and carbon capture and utilization (CCU) need to be measured, reported and verified through advanced MRV

mechanisms, including maturing data on the lifecycle of carbon in key applications. Investing in reliable and independent ways to measure and report engineered carbon removal pathways across CCS, CCU and CCUS will be imperative [22].

2.7. Avoidance of leakage

36. A submitter called for only accounting for net positive leakage (i.e. no additions should be made to emission reductions or removals to account for negative leakage) [1]. In order to be able to scale up technology-based removal activities, criteria may require project developers to procure renewable power, which allows them to be expanded into power grids where they have optimal climate conditions for generation. This guidance would enable project developers to rely on existing contractual frameworks, developers, and supply chains, and allow for flexibility in environmental accounting for climate-based mitigation systems on a broad yet still auditable scale. The need to consider the overall GHG effects across the whole lifecycle of some removal activities (e.g. embodied emissions in material usage) may also be an important aspect that warrants deeper consideration [11].

37. Buffer pools have been proposed as a solution to impermanence, but buffer contribution rates are not necessarily scientifically robust, and buffer pools have only been in existence for little over a decade, with research suggesting that California's buffer is heavily undercapitalized [18].

38. Leakage considerations are, among other things, behind the drive to move from projects to jurisdictional programmes and find transformational solutions for structural degradation problems. They may be addressed through conservative estimation rather than calculations based on empirical data, or calculated and accounted for in the crediting process. Scale can be an important determinant of the environmental impact of credits, regardless of sector. Larger-scale programmes are better positioned than individual projects that are not nested into jurisdictional-scale crediting to mitigate risks of leakage and non-additionality, as well as reversals [20].

2.8. Avoidance of other negative environmental and social impacts

39. Next to the above safeguards, ensuring full and effective participation of relevant stakeholders is key for avoiding potential negative environmental and social impacts. This can be ensured through a number of specific provisions on how stakeholder consultations must be conducted. They recommend specifically:

    (a) Requiring mitigation activity proponents to conduct an assessment of which local stakeholders will be impacted by the project and/or requiring an independent assessment of this;

    (b) Requiring that mitigation activity proponents make key information on the mitigation activity available to local stakeholders prior to conducting the local stakeholder consultation, such as the mitigation activity design documents and any supplemental documentation;

    (c) Establishing provisions to ensure that stakeholder consultations are conducted in an inclusive and culturally appropriate manner for local communities (taking into account literacy, culture and language);

(d) Requiring that the local stakeholder consultations be conducted before the decision of the mitigation activity proponents to proceed with the activity and before the validation of the activity;

(e) Requiring mitigation activity proponents to take due account of any input received in the local stakeholder consultation and publicly document how inputs received were addressed;

(f) Requiring that a DOE assess whether the mitigation activity proponents have taken due account of all inputs received in the local stakeholder consultation;

(g) Requiring mitigation activity proponents to establish mechanisms for ongoing communication with local stakeholders (e.g. periodic consultations) in a manner appropriate to the context of the stakeholders (e.g. literacy, culture and language) and take due account of input received [1].

40. Any recommendations provided by the Supervisory Body on removals to the CMA must include this issue as a central topic. An added value could be generated if not only negative impacts associated with removal activities are avoided but also a fair distribution of social and economic benefits is promoted (through guidelines that the Supervisory Body could develop in this regard) [2].

41. Furthermore, the Supervisory Body should ensure protection measures common to most forms of development cooperation, such as rights-compliant stakeholder consultations, environmental and social safeguards, and an independent grievance redress mechanism, are in place before Article 6.4 is operationalized. Further, technologies with uncertain and/or demonstrated risks to human rights and the environment should not be admitted by the Article 6.4 mechanism [3].

42. Appropriate meaningful consultation processes prior to and throughout action with rights holders and relevant stakeholders—particularly the local communities, Indigenous Peoples and marginalized groups—must be ensured. Compliance with international laws and commitments, including respecting and protecting the Indigenous Peoples' right to free, prior, and informed consent. Also, a robust and independent grievance mechanism must be established for the overall Sustainable Development Mechanism, which is applicable for activities involving removals [8].

List of submissions

1. The following table contains the list of submissions used in this information note.

Table 1. List of submissions received on activities involving removals (decision 7/CMA.4, para. 19)

	Party	**Submission date**	**Document**
1	European Union on behalf of the European Union	15 March 2023	SE-2023-03-15 EU 6.4 Supervisory Body submission Para 19
2	Colombia on behalf of Chile, Colombia, Guatemala, Panama, Paraguay and Peru	23 March 2023	Submission on removals A6.4 SB_CH,COL,PAN,PAR,PER
28	Republic of Korea	7 April 2023	ROK_Submission_A6.4_removals
29	Norway	17 April 2023	Norway submission_article 6-4 removals
33	United Kingdom	10 May 2023	UK submission on Article 6.4 removals

	United Nations System body	**Submission date**	**Document**
3	Office of the United Nations High Commissioner for Human Rights (OHCHR) on behalf of OHCHR	15 March 2023	OHCHR Article 6.4 Submission (15 March 2023)

	Admitted non-governmental organizations	**Submission date**	**Document**
4	Bellona Foundation on behalf of Bellona Foundation	17 March 2023	Bellona input on removals in Art6.4
5	Center for International Environmental Law	16 March 2023	CIEL Submission on Art. 6 and Removals_March 2023
6	Heinrich Böll Foundation (HBF)	16 March 2023	HBF_Submission on removals Art 6.4_MAR 2023
7	Global Carbon Capture and Storage Institute (Global CCS Institute) on behalf of the Global CCS Institute	15 March 2023	Global CCS Institute Submission A6.4_SB004-AA-A04
8	LIFE Education Sustainability Equality on behalf of the Women and Gender	15 March 2023	20230315_WGC_Article 6.4 submission

	Admitted non-governmental organizations	Submission date	Document
9	Carbon Capture and Storage Association (CCSA)	15 March 2023	CCSA-ZEP joint response - Article 6.4 mechanism
10	ActionAid International, on behalf of the Climate, Land, Ambition and Rights Alliance (CLARA)	15 March 2023	6.4 Submission removals
11	International Emissions Trading Association (IETA) on behalf of IETA	15 March 2023	Removals_IETA
12	World Wide Fund for Nature (WWF)	15 March 2023	WWF Submission on Removals under Article 6.4 March 2023
13	Institute for Agriculture and Trade Policy (IATP)	15 March 2023	Article 6.4 removals SB comment IATP 15.3.23 FINAL (002)
14	Friends of the Earth International on behalf of Friends of the Earth International	15 March 2023	FoEI Article 6.4_ Submission_on Removals and Emission Avoidance
15	Institute for Governance and Sustainable Development (IGSD)	15 March 2023	IGSD submission to UNFCCC - Methane Removal
16	The University of Texas at Austin	15 March 2023	GCCC response to A6.4-SB004-AA-A04
17	Indigenous Education Network of Turtle Island on behalf of the Indigenous Environmental Network (IEN)	14 March 2023	IEN Submission Article 6.4 Recommendations on Removals
18	Carbon Market Watch (CMW) on behalf of CMW	14 March 2023	CMW input on removals to SBSTA_March 2023
19	Plymouth Marine Laboratory	14 March 2023	2023 submission Plymouth Marine Laboratory
20	Environmental Defense Fund (EDF) on behalf of EDF, Conservation International, The Nature Conservancy, Wetlands International, Rare, Ocean Conservancy, Ocean & Climate Platform, National Wildlife Federation	14 March 2023	Joint Submission on Removals_March 15
21	Oeko-Institut e.V./Institute for Applied Ecology on behalf of the Stockholm Environment Institute, the University of Edinburgh and Oeko-Institut e.V.	21 March 2023	Tonne-year accounting submission 15 March 2023
30	Action Group on Erosion Technology and Concentration (ETC Group) on behalf of ETC Group	30 March 2023	ETC on removals art 6.4

	Admitted non-governmental organizations	**Submission date**	**Document**
31	Corporate Accountability International	17 March 2023	Submission-Art 6.4-Corporate Accountability

	Non-admitted entities	**Submission date**	**Document**
22	Carbon Finance Lab	17 March 2023	Submission on Removals - 5 suggestions
23	AirCapture	17 March 2023	FCCC_PA_CMA_2022 (1)
24	IEA Greenhouse Gas R&D Programme (IEAGHG)	17 March 2023	Call for input IEAGHG 0140323
25	Friends of the Earth Germany (BUND)	27 March 2023	Submission Art 6.4 BUND
26	Friends of the Earth England, Wales and Northern Ireland	22 March 2023	FOE EWNI Art 64 sub Mar 23
27	Drax Group	31 March 2023	6.4.removals.Drax
32	C-capsule	22 March 2023	UNFCCC Article 6.4 C-Capsule Submission March 2023_ (003)

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