

Supervisory Body
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**Response to “Call for input 2024 - Issues included in the annotated agenda and related annexes of the fourteenth meeting of the Article 6.4 Supervisory Body”, with respect to Draft Standard Requirements for activities involving removals under the Article 6.4 mechanism
Version 01.0, A6.4-SBM014-AA-A08**

Thank you for the opportunity to comment on the draft. I provide the following suggestions for consideration by the Supervisory Body.

General: A standard on removals under Art 6.4 needs to be consistent, and complement, other UNFCCC mechanisms and processes. Currently there are inconsistencies that will be problematic. To effectively support climate action, the standard needs to balance rigour with practicality. Currently some requirements are unnecessarily onerous which will discourage participation.

Specific comments

Definitions

1. Definition of removal

As noted in Par 7, the IPCC defines Anthropogenic removals separately from Carbon dioxide removal (CDR). The definition of removal proposed at Par 8a applies the CDR definition to the term removals. It will cause significant confusion to have removal defined differently in Art 6.4 compared with how removal is used in UNFCCC inventory reporting.

In inventory reporting, removal is the opposite of emission.

UNFCCC defines emission as “The release of greenhouse gases and/or their precursors into the atmosphere over a specified area and period of time.”

Although there is no IPCC or UNFCCC definition of removal, from the UNFCCC definition of emission (above) and sink (Any process, activity or mechanism that removes a GHG, an aerosol or a precursor to a GHG from the atmosphere), and the IPCC definition of anthropogenic removal (above), we can deduce the definition of removal as simply

“The withdrawal of a greenhouse gas (GHGs) from the atmosphere over a specified area and period of time.”

For removal, there is no requirement for durable storage. However, the standard pertains to activities involving removals and durable storage. Therefore, to avoid inconsistency and potential for confusion, use the term carbon dioxide removal, or refer to “removals with durable storage”.

2. Par 8c The description of creditable removals is very difficult to follow. The net abatement (creditable CDR) is determined as the difference in net removals between the baseline and mitigation activity, adjusted for leakage, where net removal is emission minus removal, and the removal occurs through an activity that results in durable storage or destruction of the CO₂.

3. Par 8d The definition of reversal is quite obscure and open-ended. It equates to “an emission in a given period” , with no relationship to prior removal and no clarity on the reporting boundary.
4. Par 8e “avoidable reversals” would be better worded as “Intentional reversals”
5. Requirements
Par 9 This standard should be confined to removals. Adequately accommodating both removals and emission reductions involving durable storage would make the wording obscure and complex. Delete the bracketed text.
6. Observed event
Par 18d The concept of “observed event of GHG release that potentially could have led to the reversal of removals” is very hard to follow. Does it mean “events that could pose a risk of reversal”?
It seems (Par 52) that an observed event could be reported by a third party, triggering a requirement for the participant to provide a monitoring report within 15 days. This is an unreasonable and unworkable requirement. It invites vexatious action.
7. Monitoring
It seems that for some activity types participants may be required to submit a monitoring report every year, including during the post-crediting period. This is unnecessarily onerous. In post-crediting period, reporting should focus on notifying known instances of reversals, and otherwise presenting evidence that no event likely to cause a reversal has occurred. It is not necessary to measure the forest, for example, in the post-crediting period.
8. Remediation of reversals
The requirement to make good the difference from participants own account or other mitigation activities if the buffer is insufficient to cover unavoidable reversals, is unreasonable.
9. Provide clarity that harvest as part of forest management cycle will not be considered a reversal.

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