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Legend for Columns

- 1** = Section Number in the document
- 2** = Paragraph number
- 3** = Comment – the actual feedback or observation, including justification for what needs changing
- 4** = Proposed change – suggest the text if possible

A6.4-MEP004-A03 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
N/A	N/A	We appreciate the clarity and thoughtfulness of this draft guidance. Given the complex landscape of CO ₂ standards and quantification, we advocate that the Methodology Expert Panel ensure alignment in terms of guidance and terminology with other international bodies in this space, such as the Integrity Council for the Voluntary Carbon Market's Core Carbon Principles. This will importantly mitigate confusion within the ecosystem of those working on and engaging with CO ₂ projects and outcomes. We did not notice any misalignment within the draft guidance.	N/A
4	7, 10	<p>We support the provision for “leakage mitigation” (in which activities outside the project boundary may lead to decreases in emissions or increases in removals) in paragraph 7. We also support that leakage shall not be below 0, per paragraph 10.</p> <p>We ask the Methodology Expert Panel to consider in future guidance whether portfolios of projects could be grouped together for leakage mitigation purposes, such that the sum of leakage for one might be positive, while the sum of leakage for another might be negative, leading to overall zero total leakage. We suspect such an approach could enable more total emission reductions and removals overall. For example, this could include new timber supply from a reforestation project mitigating some of the leakage of an improved forest management project that otherwise would have displaced harvesting elsewhere, but did not because the new forests maintained supply. Care would be needed avoid double-counting and ensure product equivalence.</p>	N/A

Call for public input		A6.4-MEP004-A03: Draft Standard: Addressing leakage in mechanism methodologies (v. 01.0)	
A6.4-MEP004-A03 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
5.2 – 5.3	14 - 15	<p>The current language in these paragraphs is overly restrictive for forest-based activities if the language is interpreted to mean that reforestation or improved forest management (IFM) activities must prevent all leakage. This would limit the significant global climate mitigation potential of IFM, for example, to only those activities that enhance forest productivity, while a significant portion of the contribution IFM can make to global climate mitigation—net of leakage—includes activities such as modified harvesting, which may incur some accounted-for leakage. For afforestation or reforestation activities, this could mean severely limiting reforestation, even on lands that are already in declining or marginal productivity that would incur small amounts of leakage. As a project developer, we have seen and heard of this through our own work with small landowners in the US, as well as having engaged with several colleagues in South and Central America on this issue. In some cases, we have seen that requiring a small landowner to maintain prior productivity of a commodity results in an artificial propping up of a market already in decline, which we presume is not the intention of leakage requirements.</p> <p>Therefore, we propose new language here that would mitigate these situations while maintaining robust leakage quantification and avoidance. Where leakage is appropriately quantified, projects will be incentivized to minimize and avoid it by the risk large leakage deductions bring about.</p>	<p>14. (b). If use of competing resources is identified as a source of leakage, methodologies can include applicability conditions to demonstrate abundance of such resource and that such resource would not be used in the baseline scenario. Abundance demonstrations shall be based on requirements provided for in methodologies and shall account for the economic and environmental impacts of diverting resources from prior use cases, including with respect to the sustainable use of natural or human-managed ecosystems. For example, methodologies may incentivize that a minimum amount of biomass must be retained per unit of land;</p> <p>14. (c). If changes in the level of services accounted for in the baseline is identified as a source of leakage, methodologies may incentivize the demonstration of equivalence of service;</p> <p>14. (d). For example, if a reforestation Article 6.4 activity could result in diversion of pre-project activities such as agriculture, mechanism methodologies can include conditions which incentivize activities which do not result in such diversion.</p> <p>15. If leakage is not avoided through measures indicated in the preceding section, mechanism methodologies shall include procedures to calculate and adjust for leakage in the quantification of emission reductions or net removals.</p>
5.3	19	<p>More clarity is needed around the phrase, “justified rationale for the quantification of all relevant leakage effects and those effects are fully included in the methodology’s crediting calculations.” It is not clear what would constitute a “justified rationale for quantification,” and how that differs from ensuring that all relevant leakage effects are including in crediting calculations. Does this mean to say that the methodology must provide a justified rationale for why leakage is not fully avoided? Or that the quantification of un-avoided leakage must be robust and backed by science/data/etc.?</p>	<p>Clarify what is intended by this paragraph.</p>

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