

Agenda item 3.4

Paragraph 18 of the annotated agenda

Concept note: Applicability of removal guidance to emission reductions activities and vice versa

Article 6.4 Supervisory Body – Seventeenth meeting

Bonn, Germany, 4 to 8 August 2025



At its fifteenth meeting, the Supervisory Body approved the Workplan of the Methodological Expert Panel (MEP) for 2025 which includes a request to prepare a concept note on the applicability of removal guidance to emission reduction activities and vice versa.

- MEP006: Draft version of this concept note was finalized
- Call for public inputs was open from 2 to 23 June 2025
- 45 inputs received (from 14 submitters)

Purpose

To address the mandate included in the 2025 MEP workplan

The concept note aims to identify, for each section of each standard:

- *whether its provisions should apply uniformly to all activity types or*
- *whether those provisions should be applied with activity-specific considerations*



Key findings:

- **Methodologies Standard:** Generally applies to activities involving removals;
- **Removals Standard:**
 - Generally applies to emission reduction activities with reversal risks;
 - MEP proposal to exempt certain GHG reservoirs from some aspects of the Removal Standard (*see next slide*)
 - Apart from these exemptions, the other requirements of the Removal Standard would apply in full
 - Certain provisions only apply to certain types of mitigation activities (e.g. forest-based activities)

Proposed exemptions of provisions of the **Removal Standard** to emission reduction activities:

Sections of the Removal Standard:

- 4.1 Monitoring
- 4.2 Reporting
- 4.3 Post-crediting period monitoring and reporting, and section
- 4.6 Addressing reversals.

Consideration for exemptions:

- (i) GHG reservoirs not under the control of the activity participant and
- (ii) the GHG reservoir is not in the same location as where the mitigation activity is implemented, and
- (iii) changes observed in the GHG reservoir could not be attributed to the mitigation activity

Methodologies Standard: applicability activities involving removal

Section of the Methodologies standard:	Applicability to activities involving removals
4.1 Encouraging ambition over time	Yes – but activity-specific considerations may apply*
4.2 Being real, transparent, conservative, credible	Yes
4.3. Establishing that selected baseline is below business-as-usual	Yes
4.4. Contributing to the equitable sharing of mitigation benefits between participating Parties	Yes
4.5. Aligning with the NDC of each participating Party, if applicable, its LT-LEDS, if it has submitted one, the long-term temperature goal of the Paris Agreement and the long-term goals of the Paris Agreement	Yes

Methodologies Standard: applicability activities involving removal

Section of the Methodologies standard:	Applicability to activities involving removals
4.6. Approaches to set the baseline	Yes
4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	Yes
4.8. Encouraging broad participation	Yes
4.9. Including data sources, accounting for uncertainty and monitoring requirements	Yes
4.10. Recognizing suppressed demand	Possibly - This is primarily relevant for emission reduction activities but may, in some instances, be relevant to activities involving removals

Methodologies Standard: applicability activities involving removal

Section of the Methodologies standard:	
4.11. Taking into account policies and measures and relevant circumstances	Yes
4.12. Standardized baselines	Yes (Not all types of standardized baseline will be applicable to all types of activities involving removals and emission reduction activities)
5. Additionality demonstration	Yes
6. Leakage	Yes
7. Non-permanence and reversals	Yes

* The MEP notes that the baseline standard may be amended in the future to incorporate further considerations for activities involving removals.

This concept note provides further clarity on the applicability of different sections of:

- the Methodologies Standard; and
- the Removals Standard.

➔ This will facilitate and inform the further development of relevant standards (e.g., on addressing non-permanence) and the development of mechanism methodologies and methodological tools.

Is the considered approach of granting exemptions from the Removal Standard for activities according to specific criteria acceptable?

The MEP will consider and incorporate the analysis conducted in this concept note in the development and further revision of relevant standards (e.g., on additionality, baselines, addressing non-permanence, leakage, suppressed demand) and in assessing and recommending mechanism methodologies and methodological tools for approval by the Supervisory Body.

Recommendations to the Supervisory Body

To consider and take note of this concept note.



Summary of the inputs to the SBM annotated agenda

- **P10:** Remove proposed exemptions on GHG reservoirs from elements of the Removals Standard: Monitoring, Reporting, Post-crediting Period Monitoring and Reporting, and Addressing Reversals.
- **P15:** "It would be helpful for future revisions of the baseline standard to explicitly recognize this distinction and avoid applying a uniform definition of conservativeness (as a lower baseline)."
- **P16:** Clarify "Equitable" (under the argument that the meaning of equitable is context-dependent)
- **P39:** In the context of "avoidance of other negative environmental and social impacts and respecting human rights and the rights of Indigenous People", the stakeholder suggests that:
 - "the SBM consider going further. Rather than focusing solely on minimizing harm, the guidance could explicitly encourage prioritization of project types that generate positive social and environmental co-benefits."

