Dear Supervisory Board:

DEMOcRitUS is grateful for the opportunity to provide feedback on the Article 6.4 Regulator's Briefing on Takedown Activities under the Article 6.4 Mechanism Version 04.0.

My company, from which the DEMOcritUS project originated, has at the moment, due to lack of means, only carried out tests on terraforming techniques and on the planting and development of active stands on arid or semi-arid soils. At the moment my business is mainly concentrated on other environmental works, such as the development of more performing forest systems (in terms of growth, therefore also in the storage of CO2) and the recovery of the traditional agricultural landscape of the Italian Apennines, with an eye to innovative techniques in agricultural associations.

My company operates mostly in Umbria (central Italy). It was founded about 30 years ago. We have created five permanent jobs from scratch in this sector.

A pilot project to complete the wood supply chain, soon to be implemented, will create 5 more. The long-term CDR scale targets are expected to be at least 2500 tons of CO2 per year (9200 tons equivalent per year), in my area in Umbria.

The objectives foreseen by the DEMOcritUS project, on the other hand, are much greater and described in the project presented.

As far as our company's approach to MRV methods is concerned, we immediately took steps in this direction by preferring machinery with very low power while operating in heavily wooded contexts, where the ratio of CO2 emitted compared to the active absorbing biomass is infinitesimal. Also in the other company activities we immediately took care of the completeness of the production cycles so that they were circular and closed.

With regard to the Supervisory Note, being Italian and therefore accustomed to the problems created by overly bureaucratic apparatuses, I can only note a complete analogy of behavior, where Bodies formed by bureaucrats and self-styled "experts", dispute and create problems on everything without having the real necessary knowledge to do so, I therefore hope, in the future, the creation of a council of real experts (possibly independent) extended to all participants in the X Prize CDR competition, where all aspects, technical, social, can be discussed at 360 degrees and is inexpensive to implement.

My project outlines my opinion.

Premise

The recent climate disasters, increasing worldwide and appearing even where none were recorded previously, underline the seriousness of the climate crisis, the limited time that industrialized countries have to tackle this problem, and the enormous validity of your initiative.

Focus

I believe that at the moment, the most urgent, simplest, and most cost effective intervention to implement is to plant trees, shrubs and other vegetation in semi desert areas or prairies, in addition, oviously, to all peri-urban areas (both small and large cities).

Semi-desert areas are of great interest (and the heart of the DEMOcritUS project) as at the moment they do not subtract CO2, or they subtract minimal amounts, but they can absorb high levels and store high levels in a relatively short period of time (1-5 years). After planting trees, shrubs or other vegetation, semi-desert areas start subtracting and storing CO2 immediately, reaching full functionality within 5 years and then escalating absorption thereafter.

Using plants to remove CO2 from the oceans is equally effective, but more expensive and technically difficult to implement. Machines that extract CO2 from the air are less reliable, they are both very prohibitively costly and do not solve where and how to store the sequestered CO2, which in huge quantities create further problems.

Of the three systems, land, sea, or air, that implemented on land (and specifically in semi-desert areas) is the most uncomplicated, favoring the employment of local labor with lower levels of training, therefore allowing the solution to be available everywhere, and as a bonus creating employment and improved living conditions for the inhabitants of these regions, as a contrast to desertification of territories and consequent migration of peoples.

Even easier is the planting of peri-urban areas, often located in climatically more favorable zones, which, given the large amount of CO2 they emit, should be surrounded by real strips of forest) moreover favored in growth by the large amount of CO2). It is clear that in order to cover vast areas of land with plant growth, a large production is needed. We cannot rely solely on nursery production which, being part of a market regime, with the spike in demand would raise prices and create an inflationary spiral. However, especially in temperate and tropical areas, it is possible to plant cuttings at low cost, from woods and forests, billions of plant varieties which in any case are destined to succumb to competition for survival, therefore almost irrelevant ant in the forest balance. The plants needed are available in a large number of countries and do to need highly trained professionals, thus lending to their use both in peri-urban areas and also in more distant climatically homologous regions.

Carbon Credits

I honestly believe that the carbon credit policy is not bearing fruit, since distortions were immediately activated. The countries that pollute more often for this very6 reason will have greater profits by pouring a part into the purchase of credits from this parties without proceeding towards real policies of de-pollution.

Emiliano Marini Foligno June 19, 2023