

Call for public input	A6.4-MEP002-A01: Draft Standard: Demonstration of additionality in mechanism methodologies (v. 01.0)
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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-MEP002-A01 (v.01.0)			
1	2	3	4
Section no.	Para. no.	Comment	Proposed change (Include proposed text)
4.1	16	<p>Limit on Credit Stacking</p> <p>In addition to the approaches identified in the paragraph 16 of the Draft Standard A6.4-MEP002-A01, another aspect that needs to be looked into is 'credit stacking'. This has been addressed in the section 3.4.2 of the US Landfill Protocol from Climate Action Reserve. This may also be called double claiming of the benefits. Following references may be referenced for the risk:</p> <ol style="list-style-type: none"> 1. Stacking 45Q benefits in the US along with the carbon credit benefits https://payneinstitute.mines.edu/stacking-45q-with-voluntary-carbon-markets/ 2. Stacking Green Credit benefits in India in addition to carbon credit benefits https://pib.gov.in/PressReleaselframePage.aspx?PRID=1967476 3. Stacking biodiversity credits/ Ecosystem credits along with the carbon credits 4. Stacking mandatory CSR expense with the carbon credit benefits https://santhoshjayaram.com/carbon-credits-indian-csr/ 	<p>Limit on Credit Stacking: Mechanism methodologies shall include provisions to demonstrate caused by eligible mitigation activities would not result in credit stacking.</p> <p>Definition Credit Stacking</p> <p>Credit stacking is defined as establishing more than one credit on spatially overlapping areas. Credit types include carbon, endangered species, water quality, and wetlands (https://wqt.epri.com/credit-stacking.html).</p> <p>Or</p> <p>'Stacking' is when various overlapping ecosystem services produced on a given piece of land are measured and separately 'packaged' into a range of different credit types or units of trade that together form a stack.</p> <p>The components of the stack can then be sold individually to different buyers and separate payments received for each set of services. (Ref: Theory and Practice of 'Stacking' and 'Bundling' Ecosystem Goods and Services: A Resource Paper)</p> <p>The meaning could be extended to other type of projects in addition to the AFOLU type where different credits can be claimed as provided in the 'Comment' column.</p>

[illegible]