Call for public input A6.4-MEP002-A01: Draft Standard: Demonstration of additionality in mechanism methodologies (v. 01.0)

Name of submitter: Anubhav Dimri

Affiliated organization of the submitter (if any): Carbon Check

Contact email of submitter: anubhav@carboncheck.co.in

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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

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1	2	3	4	
Section no. Pa	Para. no.	Comment	Proposed change	
			(Include proposed text)	
4.1	16	Limit on Credit Stacking 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: 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=196747 6 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/	Limit on Credit Stacking: Mechanism methodologies shall include provisions to demonstrate caused by eligible mitigation activities would not result in credit stacking. Definition Credit Stacking 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). Or '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. The components of the stack can then be sold individually to different buyers and separate payments received for each set of services. (Ref: <u>Theory and Practice of 'Stacking' and 'Bundling' Ecosystem Goods and</u> <u>Services: A Resource Paper</u> ) 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.	

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Section no.	Para. no.	Comment	Proposed change (Include proposed text)	
5.2	30	Avoiding Lock In The statement provided in the clause 30 and Box 3 – could it be inferred		
		<ul> <li>that the incentivization of the technologies such as:</li> <li>(a) Non-renewable biomass based Improved Cookstoves (ICS) technologies prevent Cookstoves using renewable fuel as the amount of emission reduction per unit device is higher from non-renewable biomass-based ICS</li> </ul>		
		(b) or efficient lighting solutions such as LEDs, prevent implementation of renewable energy powered lighting systems as efficient lighting solutions involve expense on efficient light only and are powered by grid electricity while renewable energy powered lighting requires investment in the solar panels as well.		
5.1	28	It would be ideal to exclude only high-income countries as non- enforcement is prevalent in the lower middle-income countries located in Africa, South Asia, Southeast Asia and Latin America.		
5.3.3, 5.3.4	42, 44	It is not clear if both the conditions in (a) and (b) shall be met or either of them. If it is both, ideally 'and' is also expected to be placed after (a).		
5.5.1	46	Would the limit be based on the total investment of the project activity or per unit?		