

Call for public input	A6.4-MEP004-A03: Draft Standard: Addressing leakage in mechanism methodologies (v. 01.0)
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Date: 03/03/2025

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.	Para. no.	Comment	Proposed change (Include proposed text)
4	9a	Leakage Mitigation is important and should be included here, and throughout the document, more explicitly. Although leakage mitigation is hinted at in this paragraph -- "designing the mitigation activity... in a way that the same level of service is provided under the mitigation activity as in the baseline scenario."	9a. Prevented by explicitly incorporating leakage mitigation measures into the design of the mitigation Article 6.4 activity. This includes ensuring that the same level of service is provided under the mitigation activity as in the baseline scenario (e.g., by providing respective applicability conditions or expanding the Article 6.4 activity boundary).
2	C	Terminology for leakage is complex, and this standard provides the opportunity to improve the field's clarity on terminology by defining key terms. Using the phrasing of "leakage emissions and removals," it is unclear whether emissions refers to positive leakage and removals refers to negative leakage. As a result, the standard should explicitly link positive/negative leakage to their emissions/removals language for clarity, first in the definitions section and then in any other part of the document that referred to "emissions and removals" (Section 4, para. 6; Section 4, para. 10).	Proposed Addition to Definitions Section: *Leakage: Anthropogenic emissions (positive leakage) and removals (negative leakage) of greenhouse gases that occur outside the Article 6.4 activity's boundary and are attributable to the activity." For other occurrences throughout the text, change "emissions and removals" to "emissions (positive leakage) and removals (negative leakage)."
5	Additional subsection - 5.4	Create an additional subsection titled "How to estimate leakage" with approved methods and models, as well as the robustness metrics that must be met for methods to be approved. An example for how this section might look is Section 4 para 10, which specifies that negative leakage must be defined as zero, rather than an additional benefit to the project. Including a subsection clarifying methods and robustness metrics will provide guidance on how to achieve the requirements set out in the standards.	"5.4 How to estimate leakage," including approved methods and models and robustness metrics/process for approval of methods"
5.3	Additional paragraph 22	Provide guidelines on how detailed an assessment of leakage must be, clarifying if an average leakage estimate for a type of project/ecosystem/situation is acceptable, or whether leakage estimates must be project/site-specific.	
5.3	Additional paragraph 23	Provide details on exactly how calculated leakage must be deducted/accounted for. For example, several methodologies currently estimate leakage impacts, but then make a categorical deduction (i.e. 0, 10, 40, or 70% deduction). Are these methodologies acceptable under the standard, or would the standard require more precise calculations for leakage deductions.	

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