CALL FOR INPUT

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Instruction: Enter your input in the table below.

Document reference number and title:
A6.4-MEP006-A02. Concept note: Applicability of removal guidance to emission reductions activities and vice versa (version 01.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	3. Key issues and proposed solutions	Paragraph 8	The three-part exemption test appears overly restrictive and may create practical implementation challenges. The conjunctive requirement that ALL three conditions must be met simultaneously (no control, different location, AND no attribution) could exclude legitimate cases where monitoring is genuinely infeasible but only two conditions are met. This could particularly impact innovative removal technologies or cross-border activities.	Recommend revising paragraph 8 to allow exemptions where at least two of the three conditions are met, with additional safeguards such as enhanced risk assessment or alternative compliance mechanisms for partially exempt reservoirs.
2	3.1.10	Paragraph 20	The categorical exclusion of suppressed demand provisions for removal activities may be too absolute. Some removal activities, particularly in developing countries, could address energy access while also providing removals (e.g., biochar cookstoves, solar-powered direct air capture in rural areas). Complete exclusion may miss opportunities for integrated development benefits.	Modify the text to state: "the provisions for recognizing suppressed demand are primarily relevant to emission reduction activities and generally should not apply to activities involving net removals, except where removal activities demonstrably address unmet basic human needs such as energy access."

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3	3.2.3, 3.2.4, 3.2.5, 3.2.8	Paragraphs 28-37	The exemption framework references "paragraph 8" conditions but the document structure makes this reference unclear. Additionally, the differential application of requirements (some sections apply fully, others partially) creates complexity that may lead to inconsistent implementation across different activity types and jurisdictions.	Clarify the cross-references and create a comprehensive exemption matrix table that clearly shows which specific requirements apply to which activity types under which conditions. Consider developing standardized exemption determination procedures.
4	Tables 1 and 2	Summary tables on pages 6-7	The summary tables provide helpful overviews but lack sufficient detail on activity-specific considerations mentioned throughout the text. The tables should include more granular guidance on when and how activity-specific considerations apply, particularly for emerging technologies.	Expand the tables to include a third column detailing specific activity types or circumstances where special considerations apply, with examples such as enhanced weathering, biochar, cookstoves, and direct air capture technologies.
5	5. Subsequent work and timelines	Paragraph 39-40	The timeline for incorporating stakeholder inputs and the process for updating related standards lacks specificity. Given the complexity of cross-standard harmonization, more detailed timelines and coordination mechanisms are needed to ensure coherent implementation across all related standards.	Add specific timelines for: (1) stakeholder input consideration (e.g., "within 60 days"), (2) revised concept note publication, (3) integration into existing standards updates, and (4) establishment of ongoing coordination mechanisms between different standard development processes.

-- (*Please add rows as required*) -