|  |
| --- |
|  **CALL FOR INPUT** |
| *Name of submitter* | Anu Khan |
| *Affiliated organization of submitter (if any)* | Carbon Removal Standards Initiative |
|  *Email of submitter* | anu@carbonremovalstandards.org |
| *Date of submission* |  23 June 2025 |

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 | Paragraph 7-8 | “Accordingly, the MEP proposes to exempt certain greenhouse gas reservoirs” if those reservoirs are not under the control of the activity participant, in a different location from the activity, or changes could not be attributed to the activity. We recommend against this exemption for open-system carbon removal pathways (for example, enhanced weathering and ocean alkalinity) where the primary storage reservoir is, by definition, outside the control of the activity participant. It is absolutely necessary to include these reservoirs in calculations to achieve an accurate estimate of net removals as a result of these activities.Section 4, Para 14 of the Removals Standard allows for the use of default values (which we take the include models) to calculate removals from applicable reservoirs. We believe this section obviates the need for categorical exemptions in Section 3, Paragraph 8 of the Concept note.  | Remove the proposed exemption for reservoirs that are necessary to calculate net removals (Section 3, Paragraph 8)ORClarify in Paragraph 8 that reservoirs that are exempt from monitoring and reporting requirements reservoirs must still be included in the Removals Standard, Section 4.4 Accounting for Removals.  |
| 2 | 3 | Footnote 3 | This footnote specifically references downstream carbon storage from EW as an example of a (plausibly) exempt reservoir. We recommend against using this example as there is growing evidence that downstream carbon can be directly monitored under certain conditions (e.g. <https://agu.confex.com/agu/agu24/meetingapp.cgi/Paper/1595573> ) |  |
| 3 |  |  |  |  |
| 4 |  |  |  |  |
| 5 |  |  |  |  |
|  |  |  |  |  |

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