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| **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)** | | | | |
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| **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 | 3.1.14 | 24 | **Potential double counting of emissions:** we note the importance of addressing potential leakage of GHG emissions across international borders. However, we also note that, for the REDD+ activity type specifically, state of the art approaches involve setting a jurisdictional forest reference emissions level (FREL) and distributing the FREL to nested projects based on the estimated risk of future deforestation. Domestic leakage is captured within the FREL measurement. If a methodology is required to account for international leakage there is the possibility of double-counting: leakage from Country A may also show up as part of the FREL of country B. These emissions would then be attributed to both countries. While this may be interpreted as a conservative measure, when combined with the other layers of conservativeness (e.g., sections 3.1.1 and 3.1.3 of this document), it risks making reductions approaches financially unviable. | We recommend including guidance for activities which use a distributed jurisdictional reference level. Accounting for international leakage will require multiple Parties to agree on annual (or some other regular) adjustment of reference levels, thereby affecting project-level baselines. |
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