|  |
| --- |
|  **CALL FOR INPUT** |
| *Name of submitter* | Rueban Manokara |
| *Affiliated organization of submitter (if any)* | Worldwide Fund for Nature - International |
|  *Email of submitter* | rmanokara@wwf.sg |
| *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 | **Section 3.1 Methodologies Standard** | **3.1.9. Including data sources, accounting for uncertainty and monitoring requirements****(section 4.9)** | Baseline set as below business as usual is a welcome direction to ensure the conservativeness of emissions reduction activities. For emissions removals activities, especially nature-based removal activities, the setting of a below business as usual (BAU) baseline should recognise the inherent design elements of such projects and not unnecessarily and inadvertently disadvantage such projects. Ensuring conservativeness does not just mean having a baseline below business as usual. Instead, it is about showing evidence that the method choice to establish the baseline is at or below average of other possible scenarios, shown through a sensitivity analysis.  | Projects/initiatives including removals and emissions reductions must prove that the approach to baseline is conservative and ensures below business as usual, shown through a sensitivity analysis comparing possible scenarios. This recommendation relates well to **“The MEP notes, however, that the baseline standard may be amended in the future to incorporate further specific considerations for activities involving removals.”**, which suggests that a different requirement may be needed for removals that is different from emissions reductions, and also to section **3.1.6. Approaches to set the baseline (section 4.6),** which can specifically mention that provisions can include sensitivity analysis to show possible scenarios and which one is being used by the project, and to the explanation of conservativeness in the [**Additionality standard**](https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-003.pdf) **“Conservativeness: In the context of demonstrating additionality, a methodological approach is conservative if the data, parameters, assumptions and methods chosen are more likely to lead to conservativeness.”** |
| 2 | **Section 3.1 Methodologies Standard** | **3.1.3. Establishing that the selected baseline is below business-as-usual (section 4.3)**   | The CDM rules established the date of 12/31/1989 as the limit for there to have been some type of forests for ARR projects | Our suggestion is that the concept of forest should be amplified by referring to suppression or degradation of natural ecosystems (i.e., savanna ecosystems are included) , considering the IPCC conclusions in the IPCC Special Report on Climate Change and Land. Furthermore, there was no distinction between planted (i.e., a human-made plantation with non-native species) and native or natural forests, which inappropriately restricted the use of land. Our suggestion is that a simple criterion be adopted, whose restriction should be focused on the absence of native forests or other natural ecosystems 20 years before the project. Notwithstanding the above, no area of native vegetation subject to deforestation after 2020 should be eligible for future restoration projects under the SDM. Areas subject to degradation because of the impact of climate change, that does not result from direct human influence, may be eligible for restoration projects. The IPCC 2019 definition of degradation is a “negative trend in land condition, caused by direct or indirect human-induced processes including anthropogenic climate change, expressed as long-term reduction or loss of at least one of the following: biological productivity, ecological integrity or value to humans”. |
| 3 | **Section 3.1 Methodologies Standard**  | **3.1.15. Non-permanence and reversals (section 7)** | Risks related to climate change effects that amplify other possible risks mapped through the risk assessment analysis of the removals or emissions reductions project should be mitigated taking into consideration that climate change is a human-made, global crisis. The management of reversals should take into account reversals related to climate change. To the extent that such reversal risks are understood and can be anticipated at the time of the project design and implementation, they should be factored into the project methodology and baselines and estimated conservatively. Where possible, the risk mitigation should reflect the global nature of climate change related risks and recognise its anthropogenic causes. | The Reversal Risk Buffer Pool Account should include a share of the buffer pool to be used to address climate change related risks. Also, the **4.6.2. Reversal-related notifications and actions** should have specific provisions related to when events are climate-change driven instead of directly related to human activities surrounding the project area. This recommendation connects with the process through which “**project needs to correctly characterize the event as avoidable or unavoidable**”, and the need to better mediate the need for addition to the “**Reversal Risk Buffer Pool Account**” |
| 4 | **3.2 Removals standard** | **3.2.6 Accounting for removals - Section 4.4 of the removals standard** | Same comment as in S/n 1: In the removals standard, it is stated that “**The net change in greenhouse gas storage shall be calculated by subtracting the sum of the change in greenhouse gas stored in each applicable greenhouse gas reservoir in the baseline scenario from the sum of the change in greenhouse gas stored in each applicable greenhouse gas reservoir in the activity scenario, calculated from the start date of the period covered by a monitoring report to the end date of the same period**;” | Related to paragraph 30 in the [**Removals Standard**](https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-002.pdf) **(30. Removals eligible for crediting shall be determined as follows:**) In accounting for removals, the project should map the multiple scenarios for accounting (e.g., different combinations of subtractions of GHG between BAU and Project Activity), including the discounts due to any leakage or reversal and select the accounting method that reflects conservativeness. |
| 5 | **3.2.6 Removals standard** | **3.2.10. Avoidance of other negative environmental and social impacts and respecting human rights and the rights of Indigenous Peoples (section 4.8)** | The language concerning safeguards, respecting, promoting, and considering human rights including the rights of Indigenous Peoples, and avoiding negative impacts must be based on the agreement reached in Glasgow - that countries should appropriately respect, promote and consider their respective obligations on human rights, right to health, the rights of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity. Human rights should be upheld and negative impacts should be avoided. | Countries should appropriately respect, promote and consider their respective obligations on human rights, right to health, the rights of indigenous peoples, local communities, migrants, children, persons with disabilities and people in vulnerable situations and the right to development, as well as gender equality, empowerment of women and intergenerational equity |
|  |  |  |  |  |

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