



## CALL FOR INPUT

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Instruction: Enter your input in the table below.

Document reference number and title: <b>A6.4-MEP006-A01. Draft standard: Suppressed demand (version 01.0)</b>				
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	Overall		While funding decent living standards (DLS) is essential, it does not inherently reduce emissions or remove carbon. Thus, carbon credits – especially offsetting mechanisms like AR6.4 – are unfit to finance DLS. When entities purchase such credits to delay direct mitigation, they actively undermine climate goals.	
2	Overall		By permitting involuntary resettlement under the sustainable development tool, AR6.4 poses a risk to DLS. When carbon credits should not undermine DLS and these are important to the integrity of AR 6.4s, avoiding forced displacement should make a project ineligible.	

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3	Overall		The proliferation of new carbon crediting methodologies carries significant risks of generating excess credits with limited emissions-reduction efficacy. This oversupply may dilute the integrity of climate policy instruments and inadvertently contribute to delayed mitigation efforts. Given established evidence that climate change directly compromises foundational determinants of DLS – including water security, agricultural stability, and disaster resilience – such methodological expansion presents a paradoxical outcome: credits ostensibly designed to support DLS provision may simultaneously undermine DLS through systemic contributions to climatic destabilization.	

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4	Overall		<p>The allocation of carbon offset financing to address basic human necessities poses significant concerns regarding state capacity displacement and development sovereignty. When private actors assume responsibility for core public functions—such as water or energy—this approach may:</p> <ul style="list-style-type: none"> <li>• Erode state institutional development by reducing governmental incentives to build fiscal or administrative capabilities, particularly in contexts where public systems require reinforcement</li> <li>• Fragment accountability structures by shifting welfare obligations from democratically accountable states to market-driven entities;</li> <li>• Undermine integrated policy planning through project-based interventions that operate outside national development frameworks.</li> </ul> <p>This model challenges established principles of state-led development, wherein governments retain primary responsibility for safeguarding fundamental rights. Reliance on carbon markets risks creating perverse incentives: states may deprioritize domestic resource mobilization or regulatory development when transient offset revenues fill service gaps. Crucially, it may institutionalize a governance vacuum—where neither market mechanisms nor state structures reliably ensure long-term DLS.</p>	

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5	Overall		Incorporating suppressed demand scenarios into AR6.4 methodologies creates an irresolvable counterfactual dilemma: once such activities become creditable, establishing a defensible baseline for additionality assessment becomes methodologically impossible. This occurs because suppressed demand baselines inherently rely on hypothetical future consumption patterns that cannot be observed or verified. Consequently, the ex-post validation required for robust additionality determination – already challenging for traditional project types – loses all empirical grounding. The resulting credits would therefore represent theoretical emissions avoidance rather than measurable mitigation outcomes.	
6	5.4	31 c	More guidance should be provided on how baseline technologies should be determined. At least some kind of historical or empirical evidence of what is used on the ground in the project areas should be necessary.	
7	5.2	23 a)	What kind of peer-reviewed research is required? Does a single scientific paper suffice, or should it be a review or meta-analysis? What type of information must the paper provide, and what degree of certainty or methodological rigor is expected?	

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