|  |  |
| --- | --- |
| **CALL FOR INPUT** | |
| *Name of submitter* | ZIRIKANA GUSENGA Fidelis |
| *Affiliated organization of submitter (if any)* |  |
| *Email of submitter* | benegusengafidelis@gmail.com |
| *Date of submission* | 04/08/2025 |

Instruction: Enter your input in the table below.

| **Document reference number and title: A6.4-MEP007-A04. Draft Standard: Addressing non-permanence/reversals (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 | |  | | --- | |  |  |  | | --- | | Cover Note Section 3.2.1.1.3 | | Paragraph 22(f) | |  | | --- | |  |  |  | | --- | | Option 1 offers a more climate-aligned and equitable approach by using the total number of issued A6.4ERs as the denominator. This ensures greater contributions to the Adaptation Fund and OMGE, supporting vulnerable populations and global mitigation goals. | | Select Option 1, which calculates contributions to the Adaptation Fund and OMGE using the total number of issued A6.4ERs as the denominator. |
| 2 | |  | | --- | |  |  |  | | --- | | Appendix 1 | | |  | | --- | |  |  |  | | --- | | Paragraph 3(g) | | |  | | --- | |  |  |  | | --- | | Risk thresholds must reflect the long-term integrity of carbon removals. A reversal threshold greater than 0.1% could compromise trust and climate impact over a 100-year timescale. | | Define "negligible risk of reversal" as: A risk of reversal that results in a loss of no more than one tenth percent (0.1%) of all A6.4ERs issued, calculated over a 100-year timeframe. |
| 3 | |  | | --- | |  |  |  | | --- | | Appendix 1 | | Paragraph 5(a) | |  | | --- | |  |  |  | | --- | | Emission avoidance was explicitly deferred for consideration until 2028. Including it now could prematurely bias methodologies and blur lines between removals and reductions. | | Delete “or avoiding the loss of carbon stocks”. Proposed text: “Activities increasing carbon stocks relative to the baseline, in any of the greenhouse gas reservoirs of the biosphere.” Also remove "avoided deforestation" from footnote 1. |
| 4 | Appendix 1 | Paragraphs 29–34 | Option 1 prioritizes transparency and environmental integrity by including total issued A6.4ERs. It better supports OMGE and Adaptation Fund goals. | Select Option 1 (paragraphs 29, 31, 33) and reject Option 2 (paragraphs 30, 32, 34). |
| 5 | Appendix 3 | |  | | --- | |  |  |  | | --- | | All | | |  | | --- | |  |  |  | | --- | | Appendix 3 deviates from the CMA-endorsed Removals Standard. It introduces subjective terms, such as "intentional" vs "unintentional", and weakens safeguards critical for climate credibility and long-term mitigation outcomes. | | Reject Appendix 3 in favor of the Appendix 1 and 2 combinations, consistent with the majority view of the MEP. |
|  |  |  |  |  |

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