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| **CALL FOR INPUT** | |
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| **Document reference number and title: A6.4-MEP007-A04. Draft Standard: Addressing non-permanence/reversals (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 | Overall Structure & Administrative Burden | App. 1 & 2 vs. App. 3 | The split proposal of Appendix 1 (for methodologies) and Appendix 2 (for activities) is unnecessarily complex, creates a high administrative burden, and is inappropriate as non-permanence risks are project-specific, not methodology-specific. Directing reversal requirements to methodologies will increase costs and cause delays in approval. Appendix 3 presents a single, integrated, and clearer standard directed at activity participants, which is more efficient and user-friendly. | The Supervisory Body should reject the two-document approach proposed in Appendices 1 and 2. The standard should be structured as a single document directed at activity participants, using Appendix 3 as the basis for the final standard. |
| 2 | Sectoral Bias & Equity | App. 2, Sec 3.1, para 36; App 3, para 34(a) | The combined effect of provisions in Appendices 1 & 2 creates a strong sectoral bias that favors geological storage projects while creating prohibitive barriers for land-based solutions (NbS). Features like indefinite monitoring and complex reporting create unsustainable costs that discourage NbS participation. This undermines the Paris Agreement's mandate for wide sectoral participation. Appendix 3 proposes adjustments to allow more equal participation for all activity types. | The final standard must be sectorally neutral. Adopt the balanced framework of Appendix 3, which provides equitable requirements for all activity types, ensuring wide participation and access to benefits from Article 6.4. |
| 3 | Completeness of Standard | Sec 5, para 42; Sec 3.2.1.2.5, para 32 | The proposal in Appendices 1 & 2 is incomplete. Key components, such as a functional reversal risk assessment tool and elaborated requirements for "below-baseline" reversals, are missing. The document acknowledges these elements require "further consideration", making a full evaluation impossible. Appendix 3 addresses all requested work items, providing a complete framework. | The proposal in Appendices 1 and 2 should be set aside. The Supervisory Body should proceed with Appendix 3 as it represents a complete and evaluable proposal. |
| 4 | Post-Crediting Monitoring Duration | App. 2, Sec 3.1, para 36 vs. App. 3, Sec 5.2, para 17 | Appendix 2 requires the post-crediting monitoring period to "continue indefinitely" unless a "negligible risk of reversal" can be proven. This is a significant barrier for land-sector projects, which may be subject to perpetual, high-cost monitoring. Appendix 3 proposes a finite monitoring period of at least 45 years post-crediting, which is a more proportionate and predictable requirement. | Replace the "indefinite" monitoring period with a defined, finite duration. Proposed text (from Appendix 3): "Activity participants shall continue to monitor and report on the activity for a period of at least [45] years from the date of the final verification". |
| 5 | Monitoring & Reporting Burden | App. 1, para 39; App. 2, Sec 1; App. 3, Sec 5.3, para 24, 25 | The approach in Appendices 1 & 2 requires comprehensive and expensive "monitoring reports," with a frequency of 1-5 years, which can also be triggered by an "observed event". For the land sector, this could result in unsustainable costs. Appendix 3 proposes a more pragmatic "annual reversal report" which is tailored to detecting reversals and is more cost-effective. | The reporting requirements should be simplified to reduce the burden on participants. Adopt the "annual reversal report" concept from Appendix 3. |
| 6 | Investment Risk - Registry Suspensions | App. 2, Sec 1.1, para 4 vs. App. 3, Sec 7.2, para 91(b) | Appendix 2 mandates the immediate suspension of an activity's registry functions upon notification of a "potential reversal event". This creates significant investment uncertainty. Appendix 3 proposes a more measured approach where suspensions are a punitive measure applied only after demonstrated failures by participants to meet their obligations after a 60-day notice period. | The trigger for registry suspensions should be based on non-compliance by the activity participant, not on unconfirmed events. Adopt the fairer enforcement provisions from Appendix 3. |
| 7 | Risk Rating Calculation | App. 3, Sec 3, para 34(b) | The Removals Standard, which Appendix 1 & 2 aligns with, requires including avoidable reversals in the risk rating calculation. This unfairly penalizes land sector activities. Appendix 3 proposes to include only unavoidable (unintentional) reversals in the risk rating for buffer pool contributions, which is standard practice and more equitable. | The risk rating calculation for buffer pool contributions should only account for unintentional/unavoidable risks.  Proposed approach (from Appendix 3): "The proposed amendment is to include unavoidable reversals only within the risk rating as is normal practice". |
| 8 | Classification of Reversals | App. 1, Sec 2, para 3; App. 3, Sec 3, para 8, para 35 | The terms "avoidable" and "unavoidable" used in Appendices 1 and 2 are highly subjective and could lead to disputes. Appendix 3 proposes the terms "intentional" and "unintentional", which provides a clearer, less subjective distinction and is expected to reduce disputes. | Adopt the "intentional" and "unintentional" terminology for classifying reversals as proposed in Appendix 3. |
| 9 | Treatment of Sustainable Forest Management (SFM) | App. 1, Sec 7.3, para 41(a) vs. App. 3, Sec 6.3.1, para 70 | Appendices 1 and 2 would classify reversals from planned harvesting in a forestry project as "avoidable reversals", failing to recognize the cyclical nature of SFM. Appendix 3 provides a workable solution by allowing for harvesting and crediting activities based on the long-term average carbon stock. | A mechanism must be included to accommodate carbon stock fluctuations from legitimate management activities. Adopt the "long-term contribution crediting limit" approach detailed in Appendix 3, section 6.3.1. |
| 10 | Treatment of Below-Baseline Reversals | Sec 3.2.1.2.5, para 31, 32 vs. App. 3, Sec 7.3, para 96 | The approach in Appendices 1 and 2 is ambiguous, suggesting two un-elaborated options. One option, requiring participants to purchase A6.4ERs, creates extreme investment risk. Appendix 3 provides a clearer approach, requiring the participant to undertake site remediation to restore the carbon stock to the baseline level. | The rules for below-baseline reversals must be clear and proportionate. Adopt the approach from Appendix 3, Section 7.3, requiring participants to restore the site to its baseline condition. |
| 11 | Allowance for Recoverable Events | N/A in App 1 or 2. Cf. App. 3, Sec 7.1, para 81-83 | Appendices 1 and 2 lack a mechanism to address recoverable reversals (e.g., regrowth after a fire). This disincentivizes the land sector. Appendix 3 allows for this, specifying that an activity can continue and once it has recovered its carbon stocks to the pre-reversal level, it can once again be issued A6.4ERs. This provides a pathway back to crediting. | The standard must include a mechanism for activities to recover from reversal events. Adopt the provisions from Appendix 3, Section 7.1, paragraphs 81-83. |

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