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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 | 4.1. Principles | 8 | The principle of materiality needs to be included, otherwise measures intended to address significant release events will be applied to minor matters and the Supervisory Body will be swamped with reports. | **(g) Materiality**: Reporting and actions shall be proportional to the size of the potential reversal and the probability of it occurring. |
| 2 | Appendix 3: Addressing non-permanence in A6.4 activities |  | In 5.2. Reversal monitoring duration, the line is drawn at 0.5% risk for identifying an activity as having “negligible risk” is arbitrary and relies heavily upon the accuracy of the risk model used. Given that technological methods of sequestration are in their infancy at an industrial scale, any projections of reversals over 100 years will be highly speculative.However, land-based activities do have a 100 year track record, and the risk of releases will be above this arbitrary threshold value.Therefore, the application of this Appendix to some sequestration activities and not to others is highly questionable. One is comparing risk based on speculative assumptions with risk based on hard data. | Appendix 3 is based upon a false premise, ie that one can predict negligible risk of reversal over 100 yeas with a high degree of confidence in situations there is no actual data over a meaningful period of time to support that prediction. The Appendix seems to be punishing land-based sequestration activities about which a lot is known, and allowing those activities where there is limited experience around permanence to avoid the same provisions..Therefore, I cannot support the inclusion of Appendix 3..  |
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