

From: Julien Gastaldi <[REDACTED]>
Sent: Wednesday, 23 September, 2026 6:37
To: A6.4mechanism-info <A6.4mechanism-info@unfccc.int>
Cc: [REDACTED]
[REDACTED]
Subject: SBM023 - annotated agenda and related annexes

Submission by Maki Planet Systems Pty Ltd to the Supervisory Body of the Article 6.4 mechanism

23rd meeting (SBM 023), 5–9 October 2026

Agenda item 2.3 — Performance management: workplan of the Supervisory Body 2026 (A6.4-SBM023-AA-A02), draft preliminary workplan for 2027 (A6.4-SBM023-AA-A03) and workplan of the Methodological Expert Panel 2026 (A6.4-SBM023-AA-A04)

Maki Planet Systems is the proponent of mechanism methodology A6.4-PMM005, Savanna Fire Management. We welcome the opportunity to provide input on the workplan documents before the Supervisory Body at its twenty-third meeting.

1. Request

We respectfully request that the Supervisory Body, in agreeing the revision of the 2026 workplan of the Methodological Expert Panel and the preliminary workplan for 2027, direct the Panel to schedule A6.4-PMM005 in Table 1 of its workplan, with a specified meeting at which a recommendation will be made to the Supervisory Body.

2. Basis of the request

A6.4-PMM005 is listed in Table 5 of A6.4-SBM023-AA-A04 among the proposed mechanism methodologies currently under consideration by the Panel. It does not appear in Table 1 of that document, which sets out the products expected at each Panel meeting during 2026 and the corresponding meeting at which the Supervisory Body will consider them. Nor is it identified in the draft preliminary workplan of the Supervisory Body for 2027, which refers to bottom-up methodology processing in general terms only.

The consequence is that a proposal which has been through four rounds of clarification with the Panel has no scheduled point at which it will be taken forward, and no indicative date by which host Parties and implementing partners can plan. We do not raise this as a matter of comparison with other proposals, each of which is being

progressed on its own merits and, in a number of cases, under specific mandates from the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement. We raise it because the absence of a scheduled slot is, on its face, an oversight in the sequencing of the workplan rather than a decision on the substance of the proposal.

3. Status of the proposal

Since submission, the proponent has responded to four successive requests for clarification from the Panel. The most recent revision of A6.4-FORM-METH-002 for Savanna Fire Management was submitted in August 2026 and addresses, among other matters, baseline setting and downward adjustment, treatment of biogenic carbon stocks, applicability confined to woody savanna ecosystems, common practice analysis, uncertainty quantification, and the interaction between the proposal and the draft methodological tool on reversal risk assessment.

The methodology is an adaptation of an approach that has been in regulated operation in Australia for well over a decade, across a registered project estate exceeding 34 million hectares, with published emissions factors, peer-reviewed underlying science and a continuous record of independent verification. It is not a novel construct requiring first-principles development by the Panel. The work remaining is refinement against Article 6.4 methodological standards, and the proponent has consistently resourced that work at its own cost.

We also note that the demand for this methodology is material, with a pipeline of over 20mha identified in southern Africa and Latin America in great need of support to tackle their fire emissions as soon as possible.

4. Demonstrated demand from Parties and stakeholders

The Supervisory Body has received letters of support addressed to it from, among others:

- the Ministry of Environment and Tourism of the Republic of Botswana (26 January 2026), which expressly urges the Supervisory Body to prioritise the method as it advances through the next stages of assessment;
- the Article 6.4 National Focal Point of Timor-Leste (10 December 2025), to the same effect;
- the Sahara and Sahel Observatory, an intergovernmental organisation covering 30 member countries (9 December 2025);
- BioCarbon Partners (Zambia) and Umgrauemeio (Brazil), as implementing organisations in the Miombo and Cerrado biomes respectively.

Copies are annexed for the convenience of members.

Each identifies the same problem: increasing wildfire frequency and intensity in savanna landscapes, and the absence of an internationally recognised crediting methodology through which performance-based finance can be mobilised to address it. Savanna and grassland fire is a material and under-served source of non-CO2 emissions, and the affected geographies are concentrated among least developed countries and developing country Parties whose participation in the mechanism the Supervisory Body has repeatedly undertaken to support.

We would also note the Leaders' Call to Action on Wildfire Resilience issued at COP 30, which recognises the need to scale integrated fire management. An operational Article 6.4 methodology is among the few instruments through which that call can be financed at landscape scale.

5. Proposed workplan amendment

We suggest the following minimal amendments, which we believe are consistent with the workload assumptions set out in A6.4-SBM023-AA-A03:

- in Table 1 of the 2026 Panel workplan, add A6.4-PMM005 under "Processing of new methodologies / tools (bottom-up)" with a recommendation to be made to the Supervisory Body following MEP 017;
- in the preliminary 2027 workplan, identify A6.4-PMM005 by name under bottom-up development, with Panel recommendation and Supervisory Body consideration at or before SBM 024.

We remain available to respond to any further request for clarification from the Panel within the timeframes the Panel specifies, and to provide any supporting data, operational evidence or technical briefing that would assist members.

Annexes

- A. Letter of support, Ministry of Environment and Tourism, Republic of Botswana, 26 January 2026
- B. Letter of support, Article 6.4 National Focal Point, Timor-Leste, 10 December 2025
- C. Letter of support, Sahara and Sahel Observatory, 9 December 2025
- D. Letter of support, BioCarbon Partners, December 2025
- E. Letter of support, Umgrauemeio, December 2025

Julien Gastaldi

CEO | Maki Planet Systems



Maki Planet Systems Pty Ltd is part of the Corporate Carbon group of companies.

Suite 3 Level 7, 25 Bligh Street, Sydney NSW 2000, Australia

t: 1300 227 206 (1300 CARBØN)

m: +

e:

w: www.makiplanetsystems.com/

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We acknowledge the Traditional Owners of Country throughout Australia and their continuing connection to land, sea, and community. We pay our respects to them and their cultures, and to the Elders both past and present. We further acknowledge the special role that indigenous people play in mitigating and adapting to climate change around the world.