

From: Rick Berg <rick@nori.com>
Sent: Friday, 16 June, 2023 19:20
To: Supervisory-Body <Supervisory-Body@unfccc.int>
Cc: Radhika Moolgavkar <radhika@nori.com>
Subject: Structured Public Consultation - Removal Activities

June 16, 2023
Article 6.4 Supervisory Body
United Nations Framework Convention on Climate Change (UNFCCC)

Subject: Input on Structured public consultation: Removal activities under the Article 6.4 mechanism

Dear Members of the Supervisory Body and Secretariat:

Thank you for the opportunity to provide structured input on removal activities under the Article 6.4 mechanism. We are encouraged by the progress made in developing carbon removal guidelines. Our input addresses the first question of the structured consultation: **Discuss the role of removals activities and this guidance in supporting the aim of balancing emissions with removals through mid-century.**

The inclusion of carbon removals separately from emission reductions is a critical step forward. In addition, we are encouraged by the Supervisory Body's efforts towards providing recommendations for both open-system and closed-system solutions (approximately corresponding to nature-based and engineered solutions, respectively). Including all available approaches in the mechanism is crucial for it to be effective in reducing atmospheric carbon dioxide concentrations quickly enough to meet science-based targets.

We fully support the acknowledgement of the variability in storage durations associated with different carbon removal solutions. Shorter duration storage solutions should be treated differently than removals that have century-scale or longer storage durations. However, we strongly advocate for their inclusion in the Article 6.4 mechanism. By formulating policies that incentivize the scaling and long-term implementation of shorter-duration nature-based solutions, we can effectively reduce cumulative warming and mitigate peak global temperatures and associated climate tipping elements. Recent high-quality modeling studies have unequivocally demonstrated the potential of these solutions in contributing to these positive outcomes^{1,2}. We encourage the consideration of these findings in the design of the Article 6.4 mechanism.

Combinations of carbon removal solutions can also offer more flexibility and greater impact in various ways, such as through "horizontal stacking" or replacement of mixtures of removals over time. This has been widely discussed in the voluntary markets^{3,4,5} and other innovative approaches have been taken by companies using a portfolio-style approach. Nori has recently released a carbon removal product concept called the "blended tonne", which combines ex-post soil carbon removals that have a guaranteed 10-year permanence with ex-ante long-storage duration removals as real supply increases within the next decade. This type of carbon removal combination can better contribute to the immediate and long-term climate impact required to address the immediacy of the climate crisis. Allowing greater flexibility with combining removal types within the Article 6.4 mechanism can foster more innovation and faster scaling of carbon removal sustainably.

It is important to emphasize that the adoption of both nature-based and engineered solutions is essential in urgently addressing the escalating climate crisis. Moreover, promoting the

utilization of both approaches can create more opportunities for market participation beyond the developed world. By diversifying the range of solutions available, we can address the urgent climate challenges we face while fostering a more inclusive and robust international response.

We wholeheartedly support the progress made in incorporating carbon removal guidance into Article 6.4. Thank you for your dedication and efforts in advancing robust carbon removal practices.

Sincerely,

Richard Berg
Methodology Research and Development Lead

Radhika Moolgavkar
Head of Supply and Methodology

Nori, Inc.

References

¹ Matthews, HD, et al. "Temporary nature-based carbon removal can lower peak warming in a well-below 2 C scenario." *Communications Earth & Environment* 3.1 (2022): 65.

² Crow, SE, and Sierra, CA. "The climate benefit of sequestration in soils for warming mitigation." *Biogeochemistry* 161.1 (2022): 71-84.

³ Moolgavkar, R, Berg, R, Kenyon, R. "The Carbon Removal Blended Tonne Whitepaper" (2023). <https://nori.com/blog/carbon-removal-blended-tonne-whitepaper>

⁴ Cabito, B, Dolginow, A. Accounting for Short-Term Durability in Carbon Offsetting (2022). <https://www.carbon-direct.com/insights/accounting-for-short-term-durability-in-carbon-offsetting>

⁵ Cullenward, D, Hamman, J, Freeman, J. The cost of temporary carbon removal (2020). <https://carbonplan.org/research/permanence-calculator-explainer>