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**Sent:** Wednesday, 12 October, 2022 0:35  
**To:** Supervisory-Body <Supervisory-Body@unfccc.int>  
**Cc:** Rebecca Sanders-DeMott <rsanders-demott@catf.us>; Kathy Fallon <kfallon@catf.us>; Stacey Davis <sdavis@catf.us>  
**Subject:** Call for input 2022 - activities involving removals under the Article 6.4 Mechanism of the Paris Agreement

To Article 6.4 Mechanism Supervisory Body:

Please find attached comments from Clean Air Task Force (CATF), a nongovernmental environmental organization with UNFCCC Climate Observer status. The attached comments address the definition of CDR, the use of tonne-year crediting, and the stakeholder process, and convey the following key points:

- CATF recommends using the latest definition of Carbon Dioxide Removal provided by the IPCC Working Group III contribution to the Sixth Assessment Report Technical Summary.
- CATF calls for further analysis when considering tonne-year crediting. Given the lack of consensus in the scientific, policy, and implementation communities on the suitability of tonne-year crediting for providing accurate quantification of the climate value of temporary carbon removal, more information is needed before deciding whether to include this as a crediting mechanism.
- Before rushing to adopt recommendations, CATF suggests a detailed examination of different types of CDR methods by the Supervisory Body with the support of the UNFCCC Secretariat, including analysis of the more challenging design elements like reversal and leakage and requirements to appropriately govern the range of different CDR methods.

Please let me know if you have any questions about this submission.

Thanks,  
Jonathan Lewis  
UNFCCC Climate Observer Designated Representative

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# Clean Air Task Force input on activities involving removals under the Article 6.4 Mechanism of the Paris Agreement

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Clean Air Task Force (CATF) is a global nonprofit organization working to safeguard against the worst impacts of climate change by catalyzing the rapid development and deployment of low-carbon energy and other climate-protecting technologies. With 25 years of internationally recognized expertise on climate policy and a fierce commitment to exploring all potential solutions, CATF is a pragmatic, non-ideological organization with the bold ideas needed to address climate change. CATF has offices in Boston, Washington D.C., and Brussels, with staff working around the world. CATF is an accredited observer to the UNFCCC.

As a leading nonprofit focused on climate innovation, CATF works towards global deployment of carbon management technologies to mitigate the worst effects of climate change. We consider real, measurable, permanent carbon removals an essential part of a suite of solutions that will enable us to reach the goals of the Paris Agreement, particularly when it comes to compensating for historical emissions.

CATF welcomes the call for input on activities involving removals under the Article 6.4 Mechanism of the Paris Agreement. The work of the Article 6.4 Supervisory Body is crucial in laying the foundation for the inclusion of all types of Carbon Dioxide Removal (CDR) in the crediting mechanism.

## Key Take-Aways

- CATF recommends using the latest definition of Carbon Dioxide Removal provided by the IPCC Working Group III contribution to the Sixth Assessment Report Technical Summary.
- CATF calls for further analysis when considering tonne-year crediting. Given the lack of consensus in the scientific, policy, and implementation communities on the suitability of tonne-year crediting for providing accurate quantification of the climate value of temporary carbon removal, more information is needed before deciding whether to include this as a crediting mechanism.
- Before rushing to adopt recommendations, CATF suggests a detailed examination of different types of CDR methods by the Supervisory Body with the support of the UNFCCC Secretariat, including analysis of the more challenging design elements like reversal and leakage and requirements to appropriately govern the range of different CDR methods.

## 1. Carbon Dioxide Removal Definition

CATF recommends using the latest definition of Carbon Dioxide Removal provided by the IPCC Working Group III contribution to the Sixth Assessment Report Technical Summary<sup>1</sup>:

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<sup>1</sup> Intergovernmental Panel on Climate Change, (2022) 'Climate Change 2022 Mitigation of Climate Change Technical Summary', (IPCC AR6 WG III pg TS-94)

*“Anthropogenic activities removing CO<sub>2</sub> from the atmosphere and durably storing it in geological, terrestrial, or ocean reservoirs, or in products. It includes existing and potential anthropogenic enhancement of biological, geochemical or chemical CO<sub>2</sub> sinks, but excludes natural CO<sub>2</sub> uptake not directly caused by human activities.”*

Compared to the definition used in the IPCC Special Report on 1.5 degrees and the IPCC Working Group III Annex 1: Glossary (listed as Option 1 in the A6.4-SB002-AA-A05 at meeting version of 22 September 2022), the definition outlined above has replaced “direct air capture” with a technology-neutral reference to “chemical CO<sub>2</sub> sinks”. In line with the IPCC, CATF considers CDR methods based on this definition to include enhancement of terrestrial- and ocean-based sinks through anthropogenic interventions such as forest management, afforestation and reforestation, coastal wetland restoration, and soil-carbon sequestration.

## **2. Tonne-Year Crediting**

The documents (A6.4-SB002-AA-A05 Version 01.0 and A6.4-SB002-AA-A06 Version 01.0) include tonne-year crediting as one of the approaches to address reversal in land-based removal activities.

Given the lack of consensus in the scientific, policy, and implementation communities on the suitability of tonne-year crediting for providing accurate quantification of the climate value of temporary carbon removal, more information is needed before deciding whether to include this as a crediting mechanism. Tonne-year crediting is not yet well understood and it can be applied in various ways (methodological approach to determining equivalency i.e., conversion rate, application of and subsequent choice of discounting rate, horizontal versus vertical stacking, choice of time horizon). Policy choices have an enormous impact on the value of the crediting factor and, consequently, on the environmental integrity, long-term benefits, and permanence of such a crediting approach.

CATF recommends the Supervisory Body further assess tonne-year crediting and provide greater clarity on:

- the implications of alternate policy choices in implementation of tonne-year crediting, e.g., different discount rates and time horizons, and their influence on crediting factors;
- the methods for calculating tonne-years, related uncertainties, and performance in terms of climate mitigation; and
- the compatibility of tonne-year crediting with NDC accounting and corresponding adjustments.

## **3. Timeline for Decision-Making on Removal Activities**

The Supervisory Body has met twice and will meet once more before the November 2022 CMA session in Sharm El Sheikh. During the two previous meetings, little substantial progress was made in discussing documents on removals – none of the documents have had a full read-through. The process itself is confusing for observers given that the Supervisory Body is requesting input from stakeholders on two very different versions of the same document (A6.4-SB002-AA-A05 v 01.0 and in-session version).

Given the wide spectrum of available CDR methods that keep expanding through innovation, CATF raises concern regarding the tight deadlines and expected speed of the decision-making when it comes to removals under Article 6.4. The pace of this process may result in premature exclusion of some promising, innovative CDR methods or result in designing a crediting mechanism that lacks environmental integrity.

CATF calls for detailed examination of different types of CDR methods by the Supervisory Body with the support of the UNFCCC Secretariat, including an in-depth analysis of the more challenging design elements like reversal and leakage. This should inform the decision-making, including whether it is practical to adopt a single set of recommendations that govern extremely different types of CDR methods.