

A response to a call for public inputs on **A6.4-SB002-AA-A05** (October 2022)

**Requirements for the development and assessment of mechanism methodologies pertaining to activities involving removals
(Annex 5 to the SB002 annotated agenda)**

The Global Carbon Council (GCC) welcomes the opportunity to submit its views on the document entitled “Requirements for the development and assessment of mechanism methodologies pertaining to activities involving removals” (published as Annex 5 to the SB002 annotated agenda).

The GCC appreciates an open nature and clear logic of the document referred to above allowing for its detailed analysis and providing input that may contribute to further work on it. It is our pleasure to ensure the Supervisory Body that all non-commented paras of it, in our view, already reflect the broad vision of further development of voluntary carbon market. Please note that our input is focused on these elements of Annex 5 that in our opinion may benefit from further clarity and precision of the language.

Please find below detailed input as requested in the call for inputs:

Para 5. (a): The current definition of Achieved carbon stocks “The verified carbon stocks, net of the activity emissions, leakage, and the baseline removals, that represent the amount of CO₂ removed by a removal activity” lacks reference to baseline emissions. For example, projects that will stop baseline degradation of soil (degradation results in emission of soil carbon) will achieve zero Achieved Carbon Stocks. The same may be applicable to forest stands subject to devastation/over-exploitation that still accumulate carbon at a very small rate.

On the other hand, it seems that baseline removals are not defined in this document. A definition of baseline removals may have critical impact on the interpretation of the definition of Achieved Carbon Stocks.

In our opinion the definition of Achieved carbon stocks should look like this: “The verified carbon stocks, net of the activity emissions, leakage, and the baseline removals/**emissions**, that represent the amount of CO₂ removed by a removal activity”

Para 5.(g): The current definition of Tonne-year crediting “Calculation of credits by applying an appropriate crediting factor to the achieved carbon stocks based on their actual holding period” could look like this “Calculation of credits by applying an appropriate crediting factor to the achieved carbon stocks **multiplied by** their actual holding period”

Para 6: The current language “Mechanism methodologies shall require that all removal activities monitor the achieved carbon stocks through their quantification using field measurements, or field measurements in combination with remote-sensing data where applicable.” should be changed into Mechanism methodologies shall require that all removal activities monitor the achieved carbon stocks through their quantification using field measurements, or field measurements in combination with remote-sensing **or model** data where applicable.”

Para 19: The current language “ Mechanism methodologies shall require that net removals achieved by a removal activity are equal to carbon stock achieved by the activity minus the baseline carbon stocks, minus emissions attributable to implementation of the activity, minus any leakage emissions.” should be changed to “ Mechanism methodologies shall require that net removals achieved by a removal activity are equal to carbon stock achieved by the activity minus the **change in** baseline carbon stocks, minus emissions attributable to implementation of the activity, minus any leakage emissions.”

Para 25 (b): Letter [X] should be replaced with number **10**.

Para 26: The current language “The activity boundary for the accounting of removals and project emissions shall include in-situ carbon stocks, the ex-situ carbon stocks, the equipment and the material used, and any sources of emissions related to implementation of the activity.” Should be replaced with: “ The activity boundary for the accounting of removals and project emissions shall include in-situ carbon stocks, the ex-situ carbon stocks, the equipment and the material used **if significant**, and any **significant** sources of emissions related to implementation of the activity.”

Para 28: The current language: “The net removals achieved by the activity shall be limited to those that are in addition to any removals that are likely to occur in the baseline” should be replaced with “The net removals achieved by the activity shall be limited to those that are in addition to ~~any removals that are likely to occur in~~ the baseline”

Para 31: The current language “A proposed removal activity shall demonstrate that it faces at least some barrier in its implementation in the absence of the mechanism, and also justify how the mechanism would enable the overcoming of those barriers.” Should be replaced with: “A proposed removal activity shall demonstrate that it faces at least some barrier in its implementation **or continuation** in the absence of the mechanism, and also justify how the mechanism would enable the overcoming of those barriers.”

Para 45: The current language: “ A removal activity shall not be implemented in a socio-economic context where it is likely to impact food and water security, local livelihoods and on the rights of indigenous peoples, unless the activity is likely to strengthen these as a result of its implementation” should be changed into “ A removal activity shall not be implemented in a socio-economic context where it is likely to ~~impact worsen~~ food and water security, local livelihoods and ~~on~~ the rights of indigenous peoples, ~~unless the activity is likely to strengthen these as a result of its implementation~~”

Appendix 1:

Para 2 (b): The current language “In the case of tonne-based crediting: within a period of [5][4][3] years from the last verified carbon stock inventory; and when an event occurs that is likely to have caused reversal of verified carbon stocks” should be replaced with: In the case of tonne-based crediting: within a period of [5] ~~[4][3]~~ years from the last verified carbon stock inventory; and when an event occurs that is likely to have caused reversal of verified carbon stocks.

Para 4(a): Delete the following text “The provisions of this section apply only to the removal activities that opt for tonne-based crediting” from the current para 4(a).

Para 4(c): A permanence period of **50** years should be applied.

Para 4(d)(ii)a. i.: Option 1 should be retained, Option 2 should be deleted.

Para 4(d)(ii)b.: The carbon stocks for which credits have been issued shall be monitored and verified once every ~~[3][4]~~[5] years ...

Para 4(d)(ii)b.iv: The credits accumulated in the permanence buffer shall be [retained permanently in the buffer] ~~[shall be returned to the project participants once all the credits issued to a removal activity have fulfilled the permanence requirement].~~

Para 4(d)(ii)b: Option 1 and Option 2 should be retained.