

A response to a call for public inputs on **A6.4-SB002-AA-A05-22092022** (October 2022)

**Recommendations for activities involving removals under the Article 6.4 mechanism
(SB002 in-meeting working document)**

The Global Carbon Council (GCC) welcomes the opportunity to submit its views on the document entitled “Recommendations for activities involving removals under the Article 6.4 mechanism” (published as SB002 in-meeting working document).

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 the in-meeting document 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 2(a): Option 2 should be retained. Options 1 and 3 should be deleted

Para 2(b): The current language: ““Carbon stocks” means the verified carbon stocks, net of the activity emissions, leakage, and the baseline removals, that represent the amount of carbon removed by a removal activity. This includes carbon captured through biosequestration as well as through engineering methods;” should be replaced with: ““Carbon stocks” means the verified carbon stocks, net of the activity emissions, leakage, and the baseline removals/**emissions**, that represent the amount of carbon removed by a removal activity. This includes carbon captured through biosequestration as well as through engineering methods;”

Para 4: The current language: “Removal activities shall monitor carbon stocks and changes in carbon stocks through quantification and estimation based on field measurements, field measurements in combination with remote-sensing data, or measurement through appropriate instrumentation” should be changed to “Removal activities shall monitor carbon stocks and changes in carbon stocks through quantification and estimation based on field measurements, field measurements in combination with remote-sensing data, **or models** or measurement through appropriate instrumentation”

Para 8: Letter X should be replaced with “5 (or 10 if implemented in the NFI).”

Letter Y should be replaced with 760 (2 years)

Para 11 (d): The language: “Estimates of reversals if a reversal occurred during the period covered by monitoring” should be deleted because data presented under para 11(b) will show the current stocks of carbon as affected by reversal, if any.

Para 24: The current language: “If indirect leakage, such as leakage due to market effects or resource competition, is likely to occur, the effect of such leakage shall be quantified, and an adjustment factor, to be decided by the Supervisory Body, shall be applied to the removals achieved by the activity” should be replaced with the following one: “If **significant** indirect

leakage, such as leakage due to market effects or resource competition, is likely to occur, the effect of such leakage shall be quantified, and an adjustment factor, to be decided by the Supervisory Body, shall be applied to the removals achieved by the activity.”

Para 25: The current language: “A removal activity shall to be designed to avoid or minimize leakage negative environmental and social impacts. Any negative environmental and social impacts likely to be caused by the implementation of a removal activity shall be identified in the activity design document.” Should be replaced with the following one: “A removal activity shall ~~to~~ be designed to avoid or minimize **significant** leakage negative environmental and social impacts. Any negative environmental and social impacts likely to be caused by the implementation of a removal activity shall be identified in the activity design document.”