



## Response to Call for input 2022 - Draft requirements for the development of mechanism methodologies

October 2022

With regards to the document titled Draft Recommendation. Requirements for the development and assessment of mechanism methodologies (A6.4-SB002-AA-A07) we note the following:

1. In its current form, the requirements are insufficient to operationalize the requirements for development of methodologies set in paras 33-39 of the RMPs, often not providing specific guidance, but merely restating the broad language of the RMPs. This means that some of the requirements laid out in the document may need even further operationalization. This will protract the process, create uncertainty for activity participants, especially from developing Parties, burden the Supervisory Body (SB) and call for even more capacity building before activities under the mechanism can start.

We strongly recommend that this document is finalized in a way that requires minimal further operationalization and could serve as clear go-to guidance on paras 33-39 of the RMPs both for the SB and activity participants.

2. The various elements of the guidance to demonstrate compliance with paras 33-39 of the RMPs often address the same requirements several times, creating significant duplication. Such duplication occurs both between elements of this document and between this document and document A6.4-SB002-AA-A05. This puts an excessive burden on activity participants, increases the costs and protracts the timeframe for projects, while not adding to the quality of the activities.

We suggest to request the Secretariat to prepare a technical/legal note that would collect all the elements of guidance adopted and drafted so far that operationalize the requirements of paras 33-39 of the RMP. Such an analysis would seek to demonstrate and ensure that each requirement is operationalized in way that would allow demonstrating compliance only once and that participants have a clear picture of how each of those requirements will be assessed by the SB.

3. **Para 19 (c).** In the current wording this requirement essentially mandates all activities to have vaguely stated “wider benefits” unrelated to mitigation. We strongly recommend to reword this requirement by either (1) replacing the word “ensure” with “allow for”; or (2) replacing this with a requirement to demonstrate other positive socio-





economic effects of the activity. This would be supplementary to the sustainable development safeguards present elsewhere in the requirements.

4. **Para 40.** Given that baselines set based on best available technologies (BAT) may not be performance-based and are not automatically consistent with the requirements discussed under sections 3.1 to 3.8 of this document, we recommend that these requirements set out that methodologies should explicitly demonstrate that baselines based on approaches (i) and (ii) do not require downward adjustment. Conversely, methodologies based on approach (iii) should be allowed to justifiably claim that a downward adjustment is not required in a particular case.

5. **Para 49.** In its current wording, criteria (a) for including an activity into a positive list (“Activities should be zero emissions, or net negative emissions (or removals)”) is vague and does not create clarity needed to establish such lists, if the very need for them is decided on. The key criteria for including an activity into a positive list should not be the mitigation potential, but the certainty with which additionality could be established, thus removing the burden of demonstrating it over and over again. Activities could have limited mitigation results, but still be additional with a high degree confidence.

