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**Sent:** Tuesday, 11 October, 2022 2:27

**To:** Supervisory-Body <[Supervisory-Body@unfccc.int](mailto:Supervisory-Body@unfccc.int)>

**Cc:** Ederson Augusto Zanetti <[eder.zanetti@fulbrightmail.org](mailto:eder.zanetti@fulbrightmail.org)>

**Subject:** Call for input 2022 - activities involving removals under the Article 6.4 Mechanism of the Paris Agreement.

Hello,

Thank you for the opportunity to respond to the process of defining carbon removals.

Attached is the manifestation of the Instituto Ação Verde for Response to Call for input 2022 - Activities involving removals

Best Regards,

## Response to Call for input 2022 - Activities involving removals

Global Carbon Market: A6 UNFCCC COP27 and Deforestation Double Counting

Eder Zanetti, Forester

Note: [https://youtu.be/gg\\_AKFzvNvs](https://youtu.be/gg_AKFzvNvs)

There are two calls taking place right now, at the UNFCCC (<https://unfccc.int/process-and-meetings/the-paris-agreement/article-64-mechanism/calls-for-input>), for all organizations interested in the topic of atmospheric CO<sub>2</sub> removal, to express their views on the methodologies that will be accepted for the generation of carbon credits from the official market. It is an opportunity for organizations in the Brazilian agro, forestry sector, academia, in short, for everyone to express themselves to influence the decision-making process. Also our partners in developing countries around the world, to jointly pursue low carbon industrialization opportunities for our countries. The calls are for the Requirements for the development and evaluation of mechanism methodologies related to activities involving removals Annex 5 (<https://unfccc.int/sites/default/files/resource/a64-sb002-aa-a05.pdf>), Removal activities in accordance with Article 6.4 (<https://unfccc.int/sites/default/files/resource/a64-sb002-aa-a06.pdf>) mechanism Annex 6. International Initiative for the Development of Methodological Tools for Articles, The IEAGHG is an international collaborative research program, established in 1991 by the International Energy Agency (IEA) and Carbon Watch have already submitted their submissions for the topics covered.

Double counting refers to a situation where two parties claim the same carbon removal or emission reduction as a result of having counted GHG emissions, or atmospheric CO<sub>2</sub> removals, from the same source in both countries. In the accounting of the Brazilian AFOLU sector until 2020, the Wood Forest Product PFM was always excluded, thus, there was an overestimation of GHG emissions from the land use change activity. This overestimation is related to the accounting as GHG emissions of all industrial and energy wood used in Brazil and exported to other countries. As a result, by claiming carbon credits for reducing GHG emissions from deforestation, the country was demanding payment for aerial and underground biomass



that was being used to produce pulp, paper, sawn wood and many other timber forest products, as if they had turned to smoke. Likewise, both in Brazilian cities and in all those around the world that consume timber forest products, their use and destination was being accounted again, either as atmospheric CO<sub>2</sub> removal, or as GHG emissions from the final destination. In these countries, technologies and processes that reduce GHG emissions and remove atmospheric CO<sub>2</sub> through the use of industrial wood generate carbon credit benefits, generating a double count of GHG emissions associated with Brazilian industrial wood that has already been accounted for.

It is not that Brazil did not account for industrial and energy wood, but that it did so as GHG emissions, which never existed. This fictitious deforestation generated mistaken public and private policies, developed based on fictitious data and information, which generated GHG emissions that never existed, and still failed to account for the contribution of Brazilian wood to remove atmospheric CO<sub>2</sub> and reduce GHG emissions in cities and countries that use our timber forest products. As we approach COP27, it is necessary to correct this double counting and begin to clearly demonstrate the relevant role that Brazilian industrial and energy wood has, and will have even more, in the removal of atmospheric CO<sub>2</sub> and reduction of GHG emissions throughout the world. The Brazilian low carbon forestry industry can contribute, and a lot, to solve the global climate problem, related to the excess of atmospheric CO<sub>2</sub>. The 500M ha of Amazonian forests can produce 5B tCO<sub>2</sub>e/year in timber forest products, sufficient to meet the growth in world demand by 2050. Brazilian NDCs may include increased productivity and consumption of tropical industrial wood as a goal, generating a carbon positive country, which removes the world's smoke and returns it in wood forest products.