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Sent: Tuesday, 11 October, 2022 22:08

To: Supervisory-Body <Supervisory-Body@unfccc.int>

Subject: Inputs - Article 6.4 mechanism

Dear Supervisory body team,

First of all, I would like to thank you for the opportunity to review the Article 6.4 Mechanism related documents.

I work as a carbon expert at Fairventures digital (TREEO) based in Stuttgart, Germany. I'm very delighted to share with you some comments that mainly stem from our field experience in developing a novel carbon projects' concept and monitoring tool and closely working with smallholder farmers.

Please find attached our contribution that reflects TREEO's vision. I'm not sure if our identity should appear in the document or not in case the comments will be published. If you have any questions or require another format of the document please do not hesitate to contact me.

Kind regards

Ameni Hasnaoui

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Contribution to the call for input 2022 - Activities involving removals under the Article 6.4 Mechanism of the Paris Agreement

Document 1: Information note Removal activities under the Article 6.4 mechanism (Annex 6)

4.1.1. Quantification of carbon stocks

31. In the case of land-based activities, methods based on the IPCC Guidelines exist for the measurement and estimation of carbon stocks in all terrestrial carbon pools. Estimates at successive points in time are used for calculating changes in the carbon stocks. The methods may vary in complexity, precision, accuracy and cost. Different methods are appropriate for different carbon pools at different temporal and spatial scales.

32. The most commonly used carbon stock quantification methods employ measurements conducted on vegetation (e.g. trees and shrubs) in field sample plots, in conjunction with biomass-allometry models that allow for the conversion of measured quantities into biomass.

33. It is possible to use remotely sensed data in combination with field measurements to reduce the number of required sample plots and thus reduce the cost of monitoring.

40. The use of **digital tools** can be **leveraged** for improving accuracy and reducing the cost of monitoring.

-> We agree that more innovative approaches and technologies should be supported by the mechanism for more accuracy of carbon stock quantification but also more involvement of smallholder farmers. As an example, the TREEO app allows to quantify the carbon from every single tree. The farmers will be empowered to monitor their own trees once a year by measuring the Diameter at Breast Height (DBH) which is linked in the app with an allometric formula allowing to estimate the biomass and the carbon stored.

4.2. Reporting

43. Verified monitoring reports form the basis of the issuance of credits.
44. Monitoring reports summarize the monitoring outcomes. Monitoring reports are transmitted to a designated operational entity (DOE) which verifies the correctness of the monitoring results.
45. Verified monitoring reports form the basis of the issuance of credits.

→ Combining the use of a professional digital tool for monitoring with satellite images can help the project developers avoid the high costs that should be allocated to DOEs. The verification events can also take place but they will be less expensive and less detailed as the digital tool can simplify and shorten the process of verification.

4.4. Crediting period

92. The RMP contained in the annex of decision 3/CMA.3 requires that a crediting period in respect of activities involving removals shall not be more than **15 years** (renewable maximum twice).
95. The end of the crediting period of a removal activity **is not necessarily the end of the obligations of the activity proponents to continue periodic monitoring of the carbon stocks** against which credits were issued until such carbon stocks have been held out of the atmosphere for a period equal to the permanence period as described in the next section.

-> Based on our experience and observation from the field, we strongly support a crediting period of 15 years which particularly encourages smallholder farmers to engage in afforestation and reforestation projects because in the majority of cases farmers do not want to commit directly for longer projects (e.g. 30 years). Having the possibility to renew the crediting period is much easier than designing a 30-year project from the beginning. However, requiring monitoring after the end of the project might be discouraging project developers because any monitoring would imply additional costs that might not be covered by the carbon money.

4.5. Addressing reversal

98. A basic question involved in addressing reversals is how long the activity participants should be accountable for monitoring the carbon stocks and compensating for any possible reversal. Evidently, an accountability forever is not of practical value.

99. Answering the above question requires one to consider how long the carbon sequestered by a removal activity should be held outside of the atmosphere in order to provide the same mitigation value as that provided by an emission reduction of one tonne of carbon dioxide achieved at the same point in time as the sequestration. This time period is called the “**permanence period**” in this note.

-> In practice and in the case of projects with a crediting period of 15 years developed with smallholder farmers (most probably including about 2 harvesting cycles), ensuring a permanence period of at least **40 years** is unrealistic. Furthermore, the suggested approaches to addressing the reversal are not applicable in this case.

We suggest that other carbon pools can be linked to the above-ground/ below-ground pool in order to address the reversal. In other words, if the project developers ensure that the harvested trees went to wood construction and the residues were used for producing biochar, a permanence period of nearly 100 years can be ensured. In our vision, smallholder farmers in the global south should be engaged and should benefit from carbon projects and finance and actively contribute to carbon removal. The current requirements will just continue to exclude them from the whole process.

Document 2: Draft Recommendation Recommendations for activities involving removals under the Article 6.4 mechanism (at meeting version)

2. Definitions

“Removal activities”

→ To clearly define removal activities, we suggest the use of “capture and storage” instead of “removal from the atmosphere and storage”.