From: Soto, Cinthia <Cinthia.Soto@wetlands.org>
Sent: Tuesday, 11 October, 2022 15:00
To: Supervisory-Body <Supervisory-Body@unfccc.int>
Cc: Femke Harriet Tonneijck <femke.tonneijck@wetlands.org>
Subject: Call for input 2022 - activities involving removals under the Article 6.4 Mechanism of the Paris Agreement

Dear Supervisory Body,

Kindly find attached Wetlands International contribution.

Best regards,

Cinthia Soto

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Comments Wetlands International

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

on the A6.4-SB002-AA-A05Draft Recommendations for activities involving removals under the Article 6.4 mechanism (AT MEETING VERSION Thursday, 22 September 2022) and A6.4-SB002-AA-A06 Information note Removal activities under the Article 6.4 mechanism (Version 01.0)

Date: October 11, 2022

By: Cinthia Soto, Senior Climate Change Advocacy Officer on behalf of Wetlands International

The Recommendations are formulated as required by CPs and serve their goal and are appropriate to the target group.

The appropriate Information note proposes a wider explanation and description of the removal activities and backgrounds for monitoring, accounting, and crediting.

In the current edition of the Recommendations, there are a number of discrepancies between the two texts' terminology and approaches.

We find it appropriate that the Recommendations do not limit the activities on removals by any list, as it is done in the Information note. For example, the list of so-called "removal activities" in chapter 3 para 24 of the Information note excludes the development of the constructed wetlands, restoration of carbon-rich ecosystems such as tundra and other permafrost ecosystems, steppe, pampas, paramos etc. Generally, the text does not operate by the term "ecosystem", but rather addressing to components (like vegetation, timber, species)

Paragraph 26 (a) is land-based removal activities "based on the biophysical characteristics of vegetation" excluding the pool of cyanobacteria in water and soil.

Methodological issues of land-based removals do not include some approaches that are already used in VCM standards, for example, an ecological indication that is widely used in VERRA standards.

The options for the definition of the Removal activities in the recommendation itself should be resolved before presenting text to the CPs

Our comments on the options are below:

Using CDR (carbon dioxide removal) instead of GGR (GHG removal) is logical when we are speaking about ecosystem-based removals. However, the removal of methane becomes more and more actual task. The Information Note actually addresses the equivalence of cumulative radiative forcing. So it could be used CDR in sense of CO2equivalent.

Option 3 of the definition includes the "destruction" of CO2. In this case, "climate-neutral" destruction should be mentioned, as far as often the side products of CO2 destruction are also GHGs.

Chapter 3. Requirements of the Recommendations and chapter 4 of the Information note do not include reporting on activities themselves. They address only reporting on Monitoring. However, all certification procedures include reporting on implementation and requirements to the project documentation.

Speaking about specific wetlands requirements – the recommended time horizon of 100 years or even 40 years should be adjusted depending on the land-based activity. The emissions of the first year of wetlands restoration or construction are larger than removals, and that should be clearly and transparently reported and accounted. The long-term effect of wetlands management as removal activity is much more higher than other ecosystems.

Finally, while reduction of emissions (stopping deforestation and degradation) and sequestration of emissions (reforestation) are quite distinct activities in the case of forests, these two processes are often intricately linked in the case of wetland conservation and restoration. This is because of the important role of the very carbon rich soils of many wetlands (particularly peatlands and mangroves), that continue to emit GHG upon conversion and degradation. Restoration of wetlands first and foremost reduces and eventually halts ongoing emissions (biggest impact) while also sequestering carbon. Hence a distinction between emission reductions and removals does not make sense in the case of wetlands. Long-term sequestration is possible only on the back of emission reduction activities, for instance, rewetting of drained peatlands. Wetland habitats are the best example for the intrinsic relationship between emission reductions and emission removals.