



2 November 2022

Ms. Kristin Qui
Chair
Article 6.4 Mechanism Supervisory Body

Re: Call for input 2022 - issues included in the annotated agenda and related annexes of the third meeting of the Article 6.4 Supervisory Body

Dear Chair Qui,

Thank you for the continuing opportunity to engage with the Supervisory Body and Secretariat regarding their recommendations for removals and methodologies applicable under Article 6.4.

We were happy to participate in the previous round of public input on activities regarding removals, and were excited to see the annotated agenda, draft recommendations, and updated information notes in this round of feedback.

First, we support the Supervisory Body's decision to develop high-level recommendations to the CMA that will apply generally to all project types. With this choice in mind, we encourage the Supervisory Body to continue soliciting public input for more specific recommendations in the future, such as those surrounding land-based activities.

Second, we were glad to see that the information note on activities involving removals still includes descriptions of the tonne-year and tonne-based crediting, and the importance of discount rates. We found Table 2 and appendices A through E to be especially helpful. We urge the Supervisory Body to keep these critical sections in this document for the benefit of the CMA, and to use them to inform future guidelines regarding land-based removal activities.

Third, we hope that the Supervisory Body can include more information on Equivalence based approaches to permanence. In section 4.5.1. Approaches to permanence, the information note proposes three possible approaches for quantifying the mitigation impact of removals - in Perpetuity; for 100 years; and Equivalence based. For Equivalence based, it writes that "the carbon stocks must be maintained until they counteract the effect of an equivalent amount of GHGs emitted to the atmosphere, estimated on the basis of the cumulative radiative forcing effect of a pulse emission of CO₂ during its residence in the atmosphere," but also writes that this approach is impractical because trace amounts of CO₂ remain in the atmosphere for thousands of years.



We would like to point out that it is possible to measure the proportional value of temporary crediting of any duration—including temporary 100-year credits or even down to one year terms—relative to permanent removals, using a tonne-year accounting method. Using this method, one could achieve equivalency of climate impact by storing some amount of tonnes for a finite period of time, instead of in perpetuity. As the Oxford Offsetting Principles explain, even “short term removals create value because they “help buy time to reduce emissions and invest in long-lived storage.”

(<https://www.smithschool.ox.ac.uk/sites/default/files/2022-01/Oxford-Offsetting-Principles-2020.pdf>) To read more on this approach, please see Carbon Direct’s article on short term crediting - <https://www.carbon-direct.com/insights/accounting-for-short-term-durability-in-carbon-offsetting>

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We encourage the Supervisory Body to include this information in the section on possible approaches to quantifying removals, since this is a practical way to implement the important Equivalence-based approach to permanence.

Thank you again for the opportunity to provide input to this critical process. Please feel free to reach out with any questions or further opportunities to engage.

Respectfully submitted,

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