

May 24, 2023

Article 6.4 Supervisory Body

United Nations Framework Convention on Climate Change (UNFCCC) Secretariat

Bonn, Germany

Submitted via E-mail: Supervisory-Body@unfccc.int

Re: Public comments on Annotated Agenda for SB 5 Meeting of the Article 6.4 Supervisory Body

Dear Members of the Article 6.4 Supervisory Body:

In advance of the upcoming meeting of the Article 6.4 Supervisory Body (SB 5), the Business Council for Sustainable Energy (BCSE) would like to offer comments on the findings of the [Information note: Removal activities under the Article 6.4 mechanism](#) (A6.4-SB005-AA-A09).

Founded in 1992, BCSE has been an accredited business observer to the United Nations Framework Convention on Climate Change (UNFCCC) for over 30 years. BCSE advocates for policies and the use of market-based mechanisms that accelerate the deployment of the broad portfolio of clean energy solutions to meet our energy and climate goals. BCSE is a U.S.-based coalition of companies and trade associations from the energy efficiency, energy storage, natural gas, renewable energy, sustainable transportation, and emerging decarbonization technology sectors.

Of particular concern are the findings included in A6.4-SB005-AA-A09 *Table 3. Pros and cons of the different activity types being made eligible under the mechanism*. The table presents as a “con” that “engineering-based removal activities are technologically and economically unproven, especially at scale, and pose unknown environmental and social risks...” and that “these activities do not contribute to sustainable development, are not suitable for implementation in the developing countries and do not contribute to reducing the global mitigation costs, and therefore do not serve any of the objectives of the Article 6.4 mechanism.”

BCSE does not agree with this assessment of the current state nor potential of removal technologies and believes that it should not be excluded from the full portfolio of technology solutions that are eligible under the 6.4 mechanism. A broad and full suite of technologies will be required if the goals of the Paris Agreement are to be met.

BCSE welcomes a “structured public consultation process to invite feedback from stakeholders,” as proposed in the cover note and urges the Article 6.4 Supervisory Body to schedule this process before any formal action is taken on this information note, including the development of recommendations requested by the CMA.



BCSE notes and supports the additional details and recommendations offered by the International Emissions Trading Association's submission on this topic.

BCSE appreciates the opportunity to share its views on this matter. Please contact Laura Tierney, Vice President, International Programs (ltierney@bcse.org) for additional information or questions.

Thank you for your consideration.