

**From:** Rodica Avornic <Rodica@carbongap.org>  
**Sent:** Thursday, 25 May, 2023 18:10  
**To:** Supervisory-Body <Supervisory-Body@unfccc.int>  
**Subject:** Input to SB005 annotated agenda and related annexes

Dear Members and Alternate Members of the Supervisory Body,

[Carbon Gap](#) is an environmental NGO focusing on eliminating the carbon dioxide that is already heating up the planet through ethical, responsible, and effective carbon dioxide removal (CDR). We are dedicated to making Europe the global leader in scaling the full spectrum of effective CDR methods in a safe and durable way.

We welcome the opportunity to provide input to the Supervisory Body on removal activities under the Article 6.4 mechanism. Carbon Gap advocates for a science-based approach to inform and substantiate policy-making processes. We are therefore concerned that the information note entitled "Removal activities under the Article 6.4 mechanism" (A6.4-SB005-AA-A09 version 0.40) omits fundamental aspects of the current state of scientific knowledge.

Firstly, Carbon Gap welcomes the fact that the information note is grounded in science. The Intergovernmental Panel on Climate Change (IPPC) has made it clear that, alongside the deep decarbonisation of our economies, carbon dioxide removal represents an unavoidable element of climate change mitigation. **All removals, from land-based to engineered, will be needed.**

Secondly, the mismatch between the current state of scientific knowledge on pros and cons of land-based versus engineered removals was found to be ungrounded. For broader scientific scrutiny of the various pros and cons ensued by respective carbon dioxide removal pathways, the [IPCC AR6 WG3 full report](#) table 12.6 (pp.1275-1276) and the more detailed comparison found in "[The State of CDR Report](#)" (pp.18-19) are recommended.

Thirdly, the statement that engineered-based activities do not contribute to sustainable development and do not contribute to the objectives of the Article 6.4 mechanism seems to be contrary to [Article 6.4](#) itself. Effectively, engineered-based removals contribute to all four of its objectives, and therefore not considering them would work against the fulfilment of the Paris Agreement.

Finally, Article 6.4 provides a strong opportunity to set a global standard for methodologies related to carbon removal activities. Leaving engineered removals out of the scope of Article 6.4 would be a missed opportunity to set robust global standards in this foundational period. Moreover, the efforts of some countries to develop agreements to trade climate benefits based on engineered carbon removal methods would be discouraged by the Supervisory Body's current approach vis-a-vis Art. 6.4.

Carbon Gap would be pleased to proceed with this discussion with the Supervisory Body and values the Supervisory Body's continued effort in ensuring a safe and just climate future for all. Public participation and scientifically grounded evidence are key in this endeavor.

Sincerely,  
Carbon Gap

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