

# Climate Analytics comments on information note “Removal activities under the Article 6.4 mechanism” SB005-AA-A09, Version 04.0

25 May 2023

The Article 6.4 Supervisory Body has put out an open call for input on issues included in the annotated agenda and related annexes of the fifth meeting of the Article 6.4 Supervisory Body. This call is open through May 25 2023.

The following input responds to this call and, in particular, to document A6.4-SB005-AA-A09, *Information note, Removal activities under the Article 6.4 mechanism, Version 04.0*

In our view, this note is still in a draft state, and does not fully respond to the mandate given to the Secretariat by the 6.4 Supervisory Body at its fourth meeting in March 2023, which requested the Secretariat, through its meeting report (A6.4-SB004), to:

- (ii) Prepare an updated version of the document “Information note: Removal activities under the Article 6.4 mechanism”, *taking into account the guidance and questions contained in annex 2 to this report and views from the Parties and observers, as referred to in subparagraph (i) above.* (emphasis added)

We respectfully suggest that this paper be far more substantially reworked, to respond more fully to the guidance and questions contained in annex 2 to the SB 004 meeting report, and to the views and concerns of Parties and stakeholders submitted in response to calls for inputs. In addition, this paper has elements of subjectivity that in our view may be better placed in a document that aims to compile or synthesize views, rather than in an information note that aims to be technical in nature.

Issues of particular concern include:

## **Table 3 at paragraph 39**

- **Table 3 downplays the risks of impermanent land-based removals.**

- The note states broadly that “Land-based activities are proven and safe”, however this statement is in our view subjective and unsupported. A safe removal is one that is not reversible and does not have the potential for negative spillover effects.
- Risks from land-based activities include quality risks from baseline overestimation, challenges with monitoring and verification, risks of human rights impacts, risks to biodiversity, including from monoculture plantations, risks to local livelihoods and risks from reversals.
- While there is considerable experience with land-based activities, this experience has shown that many of these activities have a high GHG integrity risk (e.g., low quality), compared to project activities in the manufacturing and industry or waste sectors (see, e.g., <https://calyxglobal.com/blog-post-dist/> and Figure 1 below, evaluating 370+ project types for GHG integrity risk based on six criteria: additionality, baseline setting, project emission estimates, leakage, permanence and overlapping claims).
- Table 3 should be explicit on cons for land-based removals: removals are not permanent, they therefore cannot substitute for emissions; they have potential for leakage; they present difficulties in assessing additionality; they have high estimation uncertainties; they present challenges for monitoring and verification; climate change itself has an impact on the durability of land-based removals, and there are practical sustainability constraints on the availability of land for land-based removals.
- **Table 3 also downplays the benefits of permanent removals from DACCS and other technological removal methods.**
- The note states 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.”
- Activities such as DACCS contribute to climate action, which is SDG 13. If the requirement is for activities to contribute to non-climate sustainable development goals, then that should be clarified. But at a minimum the treatment of sustainable development is uneven within this paper.
- “Not suitable for implementation in the developing countries” is not a relevant critique, as the Paris Agreement does not draw a distinction between Article 6 activities carried out in developed v. developing countries, unlike the CDM.
- “Reducing global mitigation costs” is also an inappropriate critique, as cost-effectiveness is not an objective of the Article 6.4 mechanism.
- The state of play on DACCS in Appendix I requires updating. An additional source of information could include the IEA, e.g., <https://www.iea.org/reports/direct-air-capture>

### **Tonne-year accounting**

- The updated note inexplicably persists in giving profile to tonne-year accounting, despite the significant concerns raised by earlier commenters.

- Commenters have pointed out fundamental problems with tonne-year accounting from an environmental integrity perspective, and in our scientific context in which cumulative emissions dictate global warming.
- We agree with other commenters that have explained that tonne-year approaches are flawed and should be dropped. See, e.g., 2022 comments submitted by Stockholm Environment Institute, CarbonPlan.

### **Removal of CO2 from oceans**

- The paper presents a suggestion (paras 21-22) that an IPCC definition of removals be expanded beyond removal from the atmosphere, to include removal from the ocean.
- Article 6.4 rules should not rewrite IPCC definitions that were adopted by consensus, and which address removal from the atmosphere.
- Moreover, marine or ocean-based geoengineering is not an appropriate topic for consideration under Article 6.4.
- As other commenters have noted, the Supervisory Body should acknowledge and respect moratoria in place under other treaty processes.

### **Temporal boundary of removals**

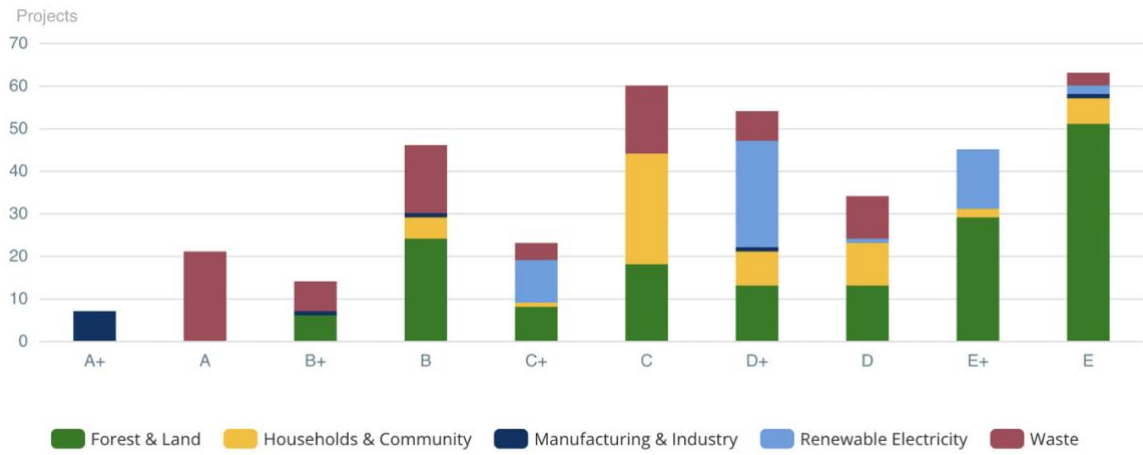
- Paragraphs 23 and 24 are potentially misleading, insofar as the 6.4 RMP are clear that crediting periods cannot start before 2021 (see 3/CMA.3, Annex, para 31(f)) and are limited in duration from that time forward.

### **Prioritization**

- As a general concluding point, the Supervisory Body in the first instance, and with priority, should address permanent emission reductions. Impermanent removals are of lesser priority to address under Article 6.4, as they cannot balance the permanent impact of emissions, and significant consideration will have to be given on how best to eliminate, manage or minimize all risks.

### **Figure 1: Calyx Global GHG Risk Rating Distribution**

## GHG Risk Rating Distribution



<https://calyglobal.com/blog-post-dist/>