

Dear Supervisory Body,

**Response to Call for input 2023 - Issues included in the annotated agenda and related annexes of the fifth meeting of the Article 6.4 Supervisory Body**

Thank you for the opportunity to comment on these issues of critical importance. While there is a host of issues at play, I focus my brief comments on four points, three substantive and one procedural.

Environmental integrity is integral to the design of Article 6.4. This is because it is fundamentally an optional mechanism designed to help mitigate climate change rather than facilitate it. It is with this in mind, that I request that:

**1. Ton-Year Accounting is rejected**

If the objective of Article 6.4 is to mitigate climate change and achieve Net-Zero, Ton-Year accounting must be rejected. No trusted academic or scientific source (including the IPCC) views it as legitimate, as the many other consultations you will receive will no doubt also reiterate. Accounting methodologies have to reflect the reality principle. This means temporary credits for temporary measures (like NBS) and permanent credits for permanent measures (like mineralization).

**2. The importance of scaling technological removals is recognized and provided for**

I note with concern the statement that technological removals are incompatible with Article 6.4 when the IPCC has, in AR6, noted they are now essential to reach the mitigation goal of the Paris Agreement. Indeed, the most valuable role Article 6.4 can play is scaling much-needed finance and infrastructure for technological removals. Current plans threaten to undermine such removals, and thus remove any chance of achieving Net-Zero in future.

**3. Sustainability co-benefits do not become an arbitrary barrier to scaling permanent removals**

Not all technology-based removals have sustainability co-benefits beyond SDG 13, nor should they. Mineralising carbon is different very from a forestry project, the characteristics of the removal must be considered as part of the sustainable development tool so as to ensure it is not an arbitrary block to building the permanent, technological based removal capacity the world urgently needs.

**4. The Supervisory Body requires future briefing notes to be anchored in evidence not opinion**

The information note reads more like debating notes than it does a balanced analysis of evidence. Unfortunately, there are too many inaccuracies to list here, perhaps the one of greatest note is the author's misunderstanding of the relationship between radiative forcing, cumulative emissions and warming. This is of extreme concern not only when issues of environmental integrity are at stake (as is the case here) but also for trust in the integrity of the underlying processes. The Supervisory Body should request that future briefings be anchored in academic analysis and evidence, not conjecture.

I urge the Supervisory Body to reflect on these concerns which run to the very core of Article 6.4, climate mitigation and our chance at achieving Net-Zero.

Injy Johnstone