From: Jason Demeny <jasondemeny@hotmail.com>
Sent: Monday, 22 May, 2023 19:18
To: Supervisory-Body <Supervisory-Body@unfccc.int>
Subject: Input to SB005 annotated agenda and related annexes

As outlined by Eve Tamme - https://evetamme.com/2023/05/21/challenges-for-carbon-removal-under-the-un-standard/ - the updated guidance on the "Eligibility of activity types under the Article 6.4 mechanism" should be updated to reflect both the value of Nature-based AND Engineered Carbon Removal approaches. While some "Engineered" approaches may be at earlier stages of development, we MUST allow them to be pursued under the UN guidance to have a chance to maximize the global carbon removal capacity over the coming decades.

Specifically,
Let's take stock of what has gone wrong.

1. The science

The note ignores the science. And the science is clear: next to steep emission reductions, removals are needed to (1) further reduce net emission levels, (2) balance residual emissions to help reach net-zero emissions, and (3) achieve and sustain net negative emissions. All types of removals (land-based and engineered) will be needed to make this a reality because all have limitations.

2. Pros and cons

The note pics and chooses pros and cons instead of offering a scientifically informed and balanced overview. A good example of a balanced comparison with pros and cons is in the IPCC AR6 WG3 full report table 12.6 "Summary of status, costs, potentials, risk and impacts, co-benefits, trade-offs and spillover effects and the role in mitigation pathways for CDR methods", or even more detailed take in the State of CDR report comparison table on pages 18-19.

3. Stakeholder input

There is a long list of stakeholder input that highlights the role of engineered removals (from Sept 2022, Oct 2022, Nov 2022, and March 2023). Most of this has been ignored in the note by judging all engineered removals to be technologically and economically unproven, and ultimately by suggesting to leave engineered removals out of the scope of Article 6.4.

4. Countries' climate targets

An increasing number of countries rely on engineered removals to achieve their climate targets, with BECCS being the most common but other methods are slowly gaining attention. Leaving such removals left out of the Article 6.4 mechanism scope makes it more difficult to achieve the increasingly ambitious NDCs over the coming decades. Article 6.4 is

not a tool for the next five years or the next ten years — it's part of the toolbox to achieve net zero emissions globally. Removals will become increasingly important in countries' climate change mitigation activities.

5. The objective of Article 6.4 of the Paris Agreement

The information note claims that engineered removals don't serve any of the objectives of the Article 6.4 mechanism. The list below, considered in combination with the points above, proves such a claim to be baseless. (FYI removals are part of climate change mitigation)

> 4. A mechanism to contribute to the mitigation of greenhouse gas emissions and support sustainable development is hereby established under the authority and guidance of the Conference of the Parties serving as the meeting of the Parties to this Agreement for use by Parties on a voluntary basis. It shall be supervised by a body designated by the Conference of the Parties serving as the meeting of the Parties to this Agreement, and shall aim:
>
> (a) To promote the mitigation of greenhouse gas emissions while fostering sustainable development;
>
> (b) To incentivize and facilitate participation in the mitigation of greenhouse gas emissions by public and private entities authorized by a Party;
>
> (c) To contribute to the reduction of emission levels in the host Party, which will benefit from mitigation activities resulting in emission reductions that can also be used by another Party to fulfil its nationally determined contribution; and
>
> (d) To deliver an overall mitigation in global emissions.

Paris Agreement, Article 6.4

6. Global methodologies for removals

Article 6.4 is widely expected to deliver a global standard for methodologies for carbon removal activities, especially for novel removal activities where a lot is still being developed. Other carbon markets are currently keeping an eye on these developments. Leaving engineered removals out of the scope of Article 6.4 would be a missed opportunity to establish robust methodologies on a global level.

Thank you,

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