



## Submission to the Art. 6 Supervisory Body

Submission Regarding Document A6.4-SB005-AA-A09

# Perspectives Submission regarding: *Information note Removal activities under the Article 6.4 mechanism*

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### Key Message

- The Secretariat has failed to provide a balanced account of views and expert input regarding “engineering-based removals”
  - Table 3 should be removed from section 3.2 (eligibility of activity types under the Article 6.4 mechanism)
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Perspectives Climate Research is an independent research organization focused on providing research and observations to advance robust climate policy. Its CDR research group examines the conditions for effective, efficient, and fair policies for carbon dioxide removals that are commensurate with the broader climate governance landscape and global environmental, social and economic objectives.

Perspectives Climate Research is troubled by the Secretariat's characterization in the fifth information note regarding the:

**characterization of “engineering-based removals” as inherently undesirable under Article 6.4.**

The summary note contains in its annex a summary table (table 3.), which is clearly imbalanced in its presentation of pros and cons of various CDR methods. It offers assertions that are in direct contradiction to expert evidence provided through both the working group meetings and public comment submissions as well as to broader scientific literatures.

There is, for example, no evidence that “engineering-based” removals do not contribute to SDGs. Our own work has shown that various CDR options – depending on social, economic, environmental, and political contexts and as a function of the manner in which they are implemented and incentivized – can have sustainable development benefits (Honegger, Michaelowa and Roy, 2021). At the very least do all CDR methods (when indeed delivering removal of CO<sub>2</sub> as per their definition) contribute to Climate Action – which is SDG 13 – by advancing the mitigation of climate change (Honegger, Burns, and Morrow, 2021).

***Insinuating non-eligibility***

Given the very clear advantages in terms of storage permanence and monitorability of “Engineering-based removal it is not the least bit appropriate to insinuate that “engineering-based removals” would not be eligible under Article 6.4. In a disturbing act of institutional overreach, the Secretariat has created such an impression by placing this table in a section discussing the *eligibility of activity types for the Article 6.4 mechanism*.

It, furthermore, speaks to the low quality of table 3 that the pros and cons listed in regard to *land-based activities* disregard the severe problems observed in crediting of land-use and land-use change mitigation results in both voluntary and compliance markets (and the well known governance problems plaguing land-based mitigation policies overall).

**Conclusion**

The UNFCCC Secretariat has a mandate to present the information and state of working group deliberations in a balanced and factual manner, which in this case it has completely failed to do. Given the gravity of this we suggest that table 3 is removed from the information note and a new version is circulated.

## References

Honegger, M., Michaelowa, A., & Roy, J. (2021). Potential implications of carbon dioxide removal for the sustainable development goals. *Climate policy*, 21(5), 678-698.

Honegger, M., Burns, W., & Morrow, D. R. (2021). Is carbon dioxide removal 'mitigation of climate change'? *Review of European, Comparative & International Environmental Law*, 30(3), 327-335.

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