

**From:** Thecla Keizer <tke@pml.ac.uk>  
**Sent:** Wednesday, 24 May, 2023 17:09  
**To:** Supervisory-Body <Supervisory-Body@unfccc.int>  
**Cc:** Matthew Frost <mafr@pml.ac.uk>; Vassilis Kitidis <vak@pml.ac.uk>; Yuri Artioli <yuti@pml.ac.uk>; Helen Findlay <hefi@pml.ac.uk>  
**Subject:** Input to SB005 annotated agenda and related annexes

Dear Supervisory Body,

Concerning the Agenda and documents under consideration for the 5th meeting of the Article 6.4 Supervisory Body, point **2.3. Matters related to the Article 6.4 mechanism**, *Under consideration* - [A6.4-SB005-AA-A09](#) - Information note: Removal activities under the Article 6.4 mechanism.

Thank you for the opportunity to provide input, Plymouth Marine Laboratory ([www.pml.ac.uk](http://www.pml.ac.uk); NGO Observer Status) would like to recommend consideration of:

- a) Moving towards recognition of other factors of importance and climate relevance in addition to CO<sub>2</sub> in the overview of pros and cons. Ecosystems can store organic carbon whilst also contributing to global warming through emissions of non-CO<sub>2</sub> Green House Gases (GHGs). For example, wetlands are a substantial global source of methane, a GHG with 80 times the global warming potential of CO<sub>2</sub>. In coastal macroalgae habitats, this methane can offset the carbon stored <https://www.nature.com/articles/s41467-022-35673-9>. Ditto, the contributions from nitrous oxide are largely unknown.
- b) A re-assessment of the mitigation potential of 'Land-based activities' that takes into account important and climate-relevant factors in addition to CO<sub>2</sub>.
- c) A re-assessment of the TRL levels of the engineering-based activities. The TRL level of engineering solutions is growing rapidly through state- and privately-funded research globally, for example in the UK, Germany, USA, China and Canada. We welcome the recognition in Table 4 that marine engineering solutions have great scalability.
- d) An inclusion of the 'Permanence' of carbon storage, over centuries at least. The benefits of several of the land-based activity are more at risk of being lost due to natural hazards (e.g. wildfire). The permanence of the storage of engineering-based activities is hugely promising. We recommend that permanence of storage and scalability are taken into account when considering the full benefits of mitigation activities.

I would be grateful for a confirmation of receipt should you be able to provide this.

Many thanks for your consideration and kind regards,  
Thecla

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