

*Input to SB005 2022 Annotated Agenda and Related Annexes*

We submit the following comments on behalf of the World Resources Institute (WRI), a global, non-profit research organization based in Washington, DC. WRI's work focuses on seven urgent challenges at the nexus of natural resources and human development, including climate change. We understand the need for carbon dioxide removal (CDR) approaches, alongside deep emissions reductions, to help meet our global climate goal of limiting temperature rise to 1.5C. Our work supports increased public funding for research, development, and demonstration for CDR while also ensuring that deployment is done in a manner that ensures environmental integrity, equity, and sustainable outcomes, while guarding against over-reliance on carbon removals at the expense of needed emissions reductions.

We appreciate the efforts to ensure that the UNFCCC considers the role CDR will play. We further thank the Supervisory Body for the opportunity to comment on issues included in the annotated agenda for SB005, including the information note on "Removal activities under the Article 6.4 mechanism Version 04.0" (A6.4-SB005-AA-A09).

Regarding the stated pros and cons of each type of approach, as categorized in Table 3, we would encourage the Supervisory Body to initiate an assessment to thoroughly consider direct air capture and other novel "engineering-based activities," including issues such as measurement, reporting, and verification; potential and expected social and environmental impacts; implications for sustainable development, including any potential benefits; and others as relevant.

In terms of eligibility of different types of approaches under the Article 6.4 mechanism, as is referenced in "Table 3. Pros and cons of the different activity types being made eligible under the mechanism," we recommend the exploration of a set of criteria for CDR in order to ensure environmental integrity, minimize social and environmental risks, identify potential local benefits, and assess the degree of mitigation provided. Information gathered in the assessment described above could also be used to inform the development of such criteria.

Carbon removal technologies make up a new industry that is rapidly evolving; each approach is at a different stage of research, development, demonstration, and deployment. Fully considering the benefits and drawbacks of projects done using these approaches, as well as the guardrails that may be needed, can help set up the broader industry for sustainable and responsible growth.