Call for public input – Template for input	Call for	public	input –	<b>Template</b>	for inpu
--	----------	--------	---------	-----------------	----------

18/09/2023

Date:

**Draft Standard: Article 6.4 mechanism activity standard for projects (ver. 03.0)** 

Name of submitter:Florian Reimer
Affiliated organization of the submitter (if any): Kennemer Eco Solution Pte Ltd
Contact email of submitter:

## **Legend for Columns**

- **0** = Main document or Appendix (provide Appendix number)
- 1 = Section Number in the document or Appendix
- **2**= Paragraph, table or figure number
- **3** = Nature of input is general, technical or editorial
- 4 = Comment the actual feedback or observation, including justification for what needs changing
- 5 = Proposed change suggest the text if possible
- 6 = Assessment of comment secretariat to document response/action taken to comment

0	1	2	3	4	5	6
M or A#	Section no.	Para., table or figure no.	Type of input G = general T = technical E= editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
М	6.2		G	Make sure that terminology used can be interpreted and applied to be able to be fulfilled also by land use projects		
M	6.3		Т	Option 2 should be chosen, but avoiding double issuance of credits for same ERRs under two different crediting schemes. (as also clarified in 8.3). E.g. by clarifying that issuance will be sought only after 1 of the 2 schemes, or there is a conversion from 1 scheme to permanently and fully to Article 6.4 and that vintages not yet credited will seek crediting under 6.4. [which is sort of addressed in 17(d)]	Option 2 should be chosen	
М	5.5	59	Т	These short-timeframes might not work well for land use projects that require longer crediting periods to have the financial resources to ensure permanence required for minimum 30 or 40 years – including for emission reduction projects in agricultural land management (reduced burning, overgrazing) or REDD+.	Explore longer crediting periods (min 30 years) for land use projects.	

Call for public input – Template for input

Draft Standard: Article 6.4 mechanism activity standard for projects (ver. 03.0)

0	1	2	3	4	5	6
M or A#	Section no.	Para., table or figure no.	Type of input G = general T = technical E= editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
M	7.3.5			Both options are overregulating the increase in capacity of a project. Globally we need to incentivize increased capacity for emission reductions and removals, not disincentivizing it by overregulation.  A land use project might be much more effective in emission reductions or removals than previously estimated in the PDD stage. As long as ERRs are measured robustly and additional, this should not be regulated too strictly.  Also (c, e, h) and other clauses in this paragraph are overregulating the possibility for essential *adaptive management* for projects to learn and adapt over time frames of years and decades. This should not be restricted with too high barriers.	Scale back requirements for additional approval from DOE, DNA or Supervisory Board for operational changes in a project as long as effects on GHG ERRs are robustly monitored & reported with an adequate monitoring plan.	