

Name of submitter: Fernando Ravanini Gardon; Diego de Paula Toledo;
Demetrius Lira Martins

Affiliated organization of the submitter (if any): Re.green

Contact email of submitter: [REDACTED]

Date: 29 September 2023

Legend for Columns

- 0** = Main document or Appendix (provide Appendix number)
- 1** = Section Number in the document or Annexes
- 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) |
| 0 | 6.1.2. | 23 – (a) | T | In this sentence it is mentioned that the DOE shall assess the information provided by the activity participants and conduct a Document Review, including “Cross checks between the information provided in the PDD and information from sources other than those used”. Does that means that any information provided in the PDD shall not change overtime? For example, if I mention in the PDD an allometric equation to be used to quantify aboveground biomass, but overtime a more robust and accurate equation is made available in the literature, so the allometric equation can not be updated? | Proposed change: “Cross checks between the information provided in the PDD and information from sources other than those used, to ensure that any information update is reliable and is in accordance with RMPs provided in the Article 6”. | |

| Call for public input – Template for input | | | | Draft Standard: Article 6.4 mechanism validation and verification standard for projects (ver. 02.0) | | |
|--|-------------|----------------------------|--|--|---|---|
| 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) |
| 0 | 6.1.2. | 22 – (a) – (ii) | T | In this sentence it is mentioned that “it is mandatory for the DOE to conduct an on-site inspection at validation for the proposed A6.4 project if: (a) Its estimated annual average of GHG emission reductions or net GHG removals is more than [50,000] [100,000] t CO2 eq”. However it is not clear if this amount of removals is calculated consider a whole PoA (group of sites) or a single CPA (for example a single site). | Proposed change: “it is mandatory for the DOE to conduct an on-site inspection at validation for the proposed A6.4 project if: (a) Its estimated annual average of GHG emission reductions or net GHG removals is more than [100,000] t CO2 eq considering a single CPA”. Also, this sentence should include the possibility of using a sample approach to audit the projects, even if a single CPA surpass the mentioned threshold. | |
| 0 | 6.2.1. | 32 – (b) (l) (m) | T | <p>In this sentence it is mentioned that The DOE shall determine (b) Compliance with the host Party’s indication of activity types that it would approve. However, activity types not approved by the host country should be still eligible for VCM.</p> <p>It also mention that projects must have (l) Approval of the project by the host Party and (m) Authorization of activity participants by the host Party and other participating Parties. However, projects not approved by the host country or project participants not authorized by the host country, should be still eligible for VCM.</p> | Proposed change: Change items (b), (l) and (m) to include such projects into the VCM, | |

| Call for public input – Template for input | | | | Draft Standard: Article 6.4 mechanism validation and verification standard for projects (ver. 02.0) | | |
|--|-------------|----------------------------|--|--|--|---|
| 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) |
| 0 | 6.2.5.5. | 51 – (a) | T | In this sentence it is mentioned requirements for parameter fixed ex-ante. However, it is not mentioned when parameter must be fixed, if it during the validation of a PoA or during the inclusion of the CPA within a PoA. | Proposed change: “If data and parameters will not be monitored throughout the crediting period of the proposed A6.4 project but have already been determined and will remain fixed throughout the crediting period, the DOE shall determine whether all data sources and assumptions are appropriate and calculations are correct as applicable to the proposed A6.4 project, and will result in an accurate or otherwise conservative estimate of GHG emission reductions or net GHG removals. If the applied methodologies require that any of these data and parameters be determined in accordance with the “Standard for sampling and surveys for Article 6.4 activities”, the DOE shall determine whether the sampling efforts were undertaken in accordance with this standard. For PoA, parameters fixed ex-ante may be defined at the moment of the inclusion of the individual CPAs within the PoA;”. | |
| 0 | 7.2.1. | 67 – (a) | T | In this sentence it is mentioned the possibility of “Temporary Deviations”, but it is not clear what qualifies a deviation as temporary. | Proposed change: There should be a sentence explaining what qualifies a deviation as temporary. | |
| 0 | 7.2.3.4. | 83 | T | It is not clear if a change in the project design would result in a new validation process for an already registered A6.4 project. | Proposed change: Clarify if a change in the project design would result in a new validation process for an already registered A6.4 project. | |
| 0 | 8.1.3. | 92 | T | It is not clear if what qualifies evidence as “Verifiable” | Proposed change: Clarify what qualifies evidence as “Verifiable”. | |
| 0 | 8.1.4.1. | 93 | E | Reductions is not correct spelled | Proposed change: Correct reductions writing. | |
| 0 | 8.1.5. | 108 | T | In this sentence it is mentioned that it is mandatory for the DOE to conduct an on-site inspection at verification if “More than three years have elapsed since the last on-site inspection conducted for verification for the project”. However, 3 years is a low timeframe for NBS projects. | Proposed change: “it is mandatory for the DOE to conduct an on-site inspection at verification if: More than FIVE years have elapsed since the last on-site inspection conducted for verification for the project”. | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

| Call for public input – Template for input | | | | Draft Standard: Article 6.4 mechanism validation and verification standard for projects (ver. 02.0) | | |
|--|----------------|----------------------------------|--|---|--|--|
| 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) |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |