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Legend for Columns

0 = A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)
 1 = Section Number in the document
 2 = Paragraph number
 3 = Comment – the actual feedback or observation, including justification for what needs changing
 4 = Proposed change – suggest the text if possible

| 0 | 1 | 2 | 3 | 4 |
|-------------------|-------------|-----------|---|--|
| Meths or Removals | Section no. | Para. no. | Comment | Proposed change (Include proposed text) |
| A6.4-SB009-A01 | 3 | 5 | We advocate for a clearer differentiation between reductions and removals within the overall structure of Article 6.4's regulatory framework. This distinction guarantees transparency and modularity in the mechanism. Modularity ensures that the vastly different needs of activities, proponents, and stakeholders are met, while transparency allows modules to learn from one another. Our proposed change would make the framework, the registry, and future guidelines more accessible, ensuring broad participation and engagement. | To differentiate A6.4ER's into Net Removals (A6.4NR?) and Emission Reductions (ER) |
| A6.4-SB009-A02 | 2.1 | 5b | Furthermore, it is imperative that the scope of Article 6.4 clearly defines activity types it does and does not regulate, in order to garner stakeholders support and financing for the development of A6.4 activities. Paragraph 5b defines removals in accordance with the IPCC AR-6 WG III technical summary, thereby excluding activities that use "natural CO2 uptake not directly caused by human activities." This definition, while simple and apparently efficient, gatekeeps participation and inhibits the development of global solutions. To prove that human activity "causes" the uptake of CO2 is scientifically impossible. Activity proponents could merely showcase that human activity correlates with an increased uptake of CO2. Especially in an ecological context, showcasing causality would make the development of projects under Article 6.4 impossible. | The mechanism should explicitly state that nature-based solutions fall under Article 6.4, as long as the activity fulfils all the mechanism requirements. All activities shall significantly increase the removal of CO2, whether human activity is directly or indirectly involved. |
| A6.4-SB009-A01 | 4.8 | 54 | In response to the development of methodologies for broad participation, as well as broad sectoral, and geographical coverage, the Supervisory Body recommends to "avoid complexity" While the intention is clearly the applicability of methodologies to a wide range of activities, the avoidance of complexity might lead to the contrary. Especially, when developing projects with complex ownership structures, involving indigenous communities, and national policies, the simplistic nature of current voluntary standards rather prevents the development of truly additional and impactful projects. We believe broad and simple methodologies will likely not account for the "context on the ground". | Methodologies should be developed and updated frequently to account for the vast variety of cultural contexts and the complexity of local climate change mitigation. |
| A6.4-SB009-A01 | 4.8 | 55 | Limiting the creation of tools to the Supervisory Body goes against the principle of broad participation and encouraging innovation. | All stakeholders involved in A6.4 projects may propose tools, providing the basis for a modular system, where methodologies account for the local context, while using common components (accredited tools) from other methodologies. |

