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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

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A01 (methodologies)	4.1 Encouraging ambition over time	17,18,19, 20	<p>Paragraphs 18 and 19 are confusing and should be further clarified. It is unclear if it relates with the baseline updating practices foreseen in existing methodologies or a new approach proposed by the SB.</p> <p>Additionally, the term “ensure” should be replaced with the term with “encourage”.</p> <p>Paragraph 20 is vague and would require further clarity, therefore we also suggest deleting it.</p>	<p>17. Paragraph 33 of the RMP states that “Mechanism methodologies shall encourage ambition over time (...)”. 18. Mechanism methodologies shall contain provisions to ensureencourage that total creditable amount of emission reductions are progressively reduced to encourage ambition of activities over time, while taking into account host Party circumstances and creditable amount of emission reductions required to remove barriers to the deployment of technologies as described in paragraph 19 below. 19. Mechanism methodologies shall contain provisions encouraging the deployment of technologies or measures that are not widely used or available in specific locations, to facilitate knowledge transfers and to encourage deployment of technologies or measures that reduce the cost of decarbonization and unlock investment in low-carbon solutions. 20. Mechanism methodologies may contain provisions to enable the inclusion of progressively more efficient and less greenhouse gas (GHG)-intensive technologies, replicable and scalable mitigation activities, an expanded user base, broader geographic coverage, and greater penetration of low-carbon solutions after initial deployment.</p>

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A6.4-SB009-A01 (methodologies)	4.2 Being real, transparent, conservative, credible	22	Language such as “up to date” and “reliable” and “extraneous” are subjective. The deleted language is not implementable as written.	22. Mechanism methodologies shall contain credible methods for estimating emission reductions or removals to ensure that the results of Article 6.4 activities represent actual tonnes of GHG emissions reduced or removed. Such estimation should be based on up to date scientific information and reliable data, excluding extraneous cofactors affecting emission reductions or removals.
A6.4-SB009-A01 (methodologies)	4.2 Being real, transparent, conservative, credible	24	“Conservative” approaches are defined in Decision 20/CMP. 1 and are subsequently incorporated into IPCC guidance, both of which should be referenced here. This document should not re-open those definitions.	24. Mechanism methodologies shall contain provisions aimed at the conservative estimation of emission reductions or removals from the measures applied, options chosen, or assumptions made, and shall not overestimate should result in conservative estimates of the emission reductions or removals from Article 6.4 activities.
A6.4-SB009-A01 (methodologies)	4.2 Being real, transparent, conservative, credible	26	Paragraph 26, letter (e) should be aligned with paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement”, which states that “Mechanism methodologies shall (...) be real, transparent, conservative, credible and below ‘business as usual’ (...).”. In order to satisfy this requirement, it is enough for baselines to be conservative. Requesting for the “ <u>most</u> conservative baseline” to be applied would be going beyond what was agreed by Parties and challenging to objectively determine.	26. Mechanism methodologies shall contain provisions to ensure that emission reductions or removals are real, transparent, conservative and credible by: (a) Including robust, transparent and user-friendly measurement, reporting and verification systems; (b) Requiring the use of technical performance standards that are data driven; (c) Including requirements to demonstrate changes in GHG emissions that transparently shows each step in the calculations and the results, and ensure that the calculated emissions reductions or removals are uniquely achieved by and attributable to the activity; (d) Adopting life cycle approaches and considering embodied emissions of materials and products, where relevant; (e) Choosing the most-a conservative emissions baseline when multiple sources of data and parameters are available to set the baseline;

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A01 (methodologies)	4.3. Establishing that the selected baseline is below business-as-usual	27	Provisions to establish baselines and conservative approaches are defined elsewhere. This terminology is not previously defined; moreover, this paragraph is redundant with other provisions, potentially creating confusion. References to "business-as-usual" should be avoided.	27. Paragraph 33 of the RMP states that "Mechanism methodologies shall (...) be below 'business as usual' (...)" .
A6.4-SB009-A01 (methodologies)	4.3. Establishing that the selected baseline is below business-as-usual	28	Provisions to establish baselines and conservative approaches are defined elsewhere. This terminology is not previously defined; moreover, this paragraph is redundant with other provisions, potentially creating confusion. References to "business-as-usual" should be avoided.	28. Mechanism methodologies shall contain provisions to require that the baseline selected for an emission reduction activity in accordance with paragraph 36 of the RMP shall be demonstrated as being below "business as usual" (BAU). BAU emissions are plausible reference benchmarks or scenarios for GHG emissions prior to or in the absence of the implementation of the activity. For that purpose, mechanism methodologies shall require the identification of the BAU scenario or reference benchmark emissions and provide an approach for their estimation
A6.4-SB009-A01 (methodologies)	4.3. Establishing that the selected baseline is below business-as-usual	29	Provisions to establish baselines and conservative approaches are defined elsewhere. This terminology is not previously defined; moreover, this paragraph is redundant with other provisions, potentially creating confusion. References to "business-as-usual" should be avoided.	29. Mechanism methodologies shall contain provisions to require activity participants to calculate the difference between the baseline emissions estimated as per the requirements in section 4.6 below and BAU emissions estimated as per paragraph 28 above as a total amount with respect to the crediting period. This shall be demonstrated in the project design document and at each renewal of the crediting period.

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A6.4-SB009-A01 (methodologies)	4.4. Contributing to the equitable sharing of mitigation benefits between participating Parties	31	The deleted language would prejudice the types of activities that could be included under jurisdictional approaches, and the commitment to consider these approaches and develop further guidance has already been established under paragraph 16 (which we support). We propose to delete this language so as not to preclude approaches or prejudice the outcome of future considerations by the Supervisory Body.	31. Mechanism methodologies shall contain provisions for contributing to the equitable sharing of mitigation benefits between participating Parties. These may include one or more of the provisions below: (a) Conditions to ensure that the total length of the crediting period(s) of activities is shorter than the lifetime of the technology implemented where there is very high confidence that emission reductions from the technology continue to be achieved beyond the end of crediting period(s); (b) The application of conditions specified by the designated national authorities (DNAs) that ensure host Party benefits are retained.
A6.4-SB009-A01 (methodologies)	4.4. Contributing to the equitable sharing of mitigation benefits between participating Parties	33	Substitute “may” with “shall”.	33. The Supervisory Body may shall prepare recommendations for host Parties, to assist them in the consideration of equitable sharing of mitigation benefits between participating Parties including co-benefits in mechanism methodologies.

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A6.4-SB009-A01 (methodologies)	4.6. Approaches to set the baseline	38	<p>The list of proposed approaches is not exhaustive, and it should provide mechanisms for other approaches to be proposed, recognized, and approved.</p> <p>The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.</p>	<p>38. Paragraph 36 of the RMP states that: “Each mechanism methodology shall require the application of one of the approach(es) below to setting the baseline, while taking into account any guidance by the Supervisory Body, and with justification for the appropriateness of the choices, including information on how the proposed baseline approach is consistent with paragraphs 33 and 35 in the RMP and recognizing that a host Party may determine a more ambitious level at its discretion: A performance-based approach, taking into account: (i) Best available technologies that represent an economically feasible and environmentally sound course of action, where appropriate; (ii) An ambitious benchmark approach where the baseline is set at least at the average emission level of the best performing comparable activities providing similar outputs and services in a defined scope in similar social, economic, environmental and technological circumstances; (iii) An approach based on existing actual or historical emissions, adjusted downwards to ensure alignment with paragraph 33 of the RMP; (iv) other approaches, as defined and approved by the host Party and approved by the Supervisory Body.”</p>
A6.4-SB009-A01 (methodologies)	4.6. Approaches to set the baseline	42	<p>The meaning of “downwards” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.</p>	<p>42. For the approaches identified in paragraph 36 of the RMP, mechanism methodologies shall contain provisions to apply the method detailed in section 4.7 below to adjust the baseline emissions downwards and to ensure consistency with paragraph 33 of the RMP</p>
A6.4-SB009-A01 (methodologies)	4.6. Approaches to set the baseline	44	<p>Replace “tool” for “guidance”.</p>	<p>44. The Supervisory Body will develop tool(s) guidance for baseline setting (baseline tools). Mechanism methodologies may contain provisions that require the application of the baseline tool(s)</p>

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	45	The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.	45. Mechanism methodologies shall address consistency of implementation of paragraph 36 of the RMP with the requirements of paragraph 33 of the RMP through the appropriate application of: (a) Downward adjustment to baseline included in paragraph 36 (iii) of the RMP; and/or (b) Downward adjustment to baseline resulting from or applied to the approaches in paragraph 36 (i) and (ii) of the RMP.
A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	46	The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.	46. If the calculated difference in paragraph 29 above, demonstrates a downward adjustment which is greater than the adjustment calculated as per paragraphs 47 and 48 below, no further adjustment is required. Where the calculated difference in paragraph 29 above is less than the adjustment calculated as per paragraphs 47 and 48 below, further adjustment is required to align with the result of paragraphs 47 and 48 below to ensure consistency with the requirements of paragraph 33 of the RMP.
A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	47	The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.	47. Factors or quantitative methods for downward adjustment shall be: (a) Included in the project design document and updated at each renewal of the crediting period; (b) Based on an estimation of emission reductions and removals necessary to achieve NDCs if applicable, and LT-LEDS where they have been submitted; (c) Based on an estimation of emission reductions and removals necessary to achieve the long-term temperature goal of the Paris Agreement differentiated by technology/sector or country/region, considering socio-economic conditions and accommodating different circumstances of the host Parties

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A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	48	<p>The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.</p> <p>The nature of these considerations is too broad and subjective to be framed in a legally binding way, implied by the use of “shall”. We recommend replacing “shall” with “should”, consistent with other UNFCCC guidance.</p>	48. The downward adjustment shall should be undertaken in a manner that considers economic viability of critical mitigation activities, large-scale transformation and decarbonisation technologies, negative emission approaches, and informed by the need of activities to contribute to achieving the long-term temperature goal of the Paris Agreement.
A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	49	<p>The meaning of “downward” is not specified and can create confusion. The application of conservative approaches is sufficient here, as per agreed and established in paragraph 33 of the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement.</p>	49. The downward adjustment to the baseline referred to above may be operationalized through: (a) Factors or quantitative methods for activities included in methodologies approved by the Supervisory Body. Activity participants, stakeholders or host Parties may propose factors or quantitative methods for the consideration of the Supervisory Body; (b) Development of factors or quantitative methods, jointly by the Supervisory Body and the host Party, with the provision for the host Party to make a request to the Supervisory Body to initiate the development of the factors or quantitative methods. The procedures for the standardized baselines may be used for this purpose; or (c) Development of factors or quantitative methods by the host Party that are specified to the Supervisory Body for approval. The procedures for the standardized baselines may be used for this purpose.

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A6.4-SB009-A01 (methodologies)	4.7. Addressing elements of paragraph 33 and paragraph 36 of the RMP	50	Replace “will” with “shall”, for consistency with UNFCCC guidance.	50. The Supervisory Body will shall develop standards, tools, and guidance to inform the implementation of paragraphs 45-49 above.
A6.4-SB009-A01 (methodologies)	4.8. Encouraging broad participation	54	The nature of these considerations is too broad and subjective to be framed in a legally binding way, implied by the use of “shall”. We recommend replacing “shall” with “should”, consistent with other UNFCCC guidance.	54. Mechanism methodologies shall should: (a) Where relevant for the sectoral and/or geographical coverage of the methodology, contain provisions that balance stringency and maximum participation by being accurate, simple, clear, and avoiding complexity such that a wide range of activity participants and host Parties can apply the methodology requirements irrespective of the scientific infrastructure, financial resources available to them, and their national circumstances; (b) Where relevant for the sectoral and/or geographical coverage of the methodology, particularly in least developed countries and small island developing States, contain provisions that take into account the context on the ground in host Parties, including institutional arrangements, and provide options to facilitate meeting of requirements, such as permitting the use of multiple data sources to address data gaps, and the use of conservative default values and/or use of benchmarked data from comparable regions to the extent they can be applicable; (c) Use language that is easy to understand, inclusive, gender-sensitive and accessible to a wide range of stakeholders, including local communities and Indigenous Peoples.

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A6.4-SB009-A01 (methodologies)	4.8. Encouraging broad participation	55	“Guidance” is more consistent with past approaches, and it encompasses a broader range of possibilities than “a tool.”	55. The Supervisory Body and its support structure should ensure that, if it is necessary to invoke a requirement in a methodology that appears elsewhere in another methodology, this should be done by reference and not by repetition. If a test method or a procedure is, or is likely to be, applicable to two or more methodologies, a tool guidance should be prepared on the method/procedure itself, and each methodology shall refer to it to prevent potential deviations.
A6.4-SB009-A01 (methodologies)	4.9. Including data sources, accounting for uncertainty and monitoring requirements	58	Such provisions have already been elaborated elsewhere; methodologies should take advantage of past work in this regard and not unnecessarily repeat or inadvertently replace such provisions, as this could generate confusion, methodological inconsistencies, and accounting errors.	58. Mechanism methodologies shall contain or reference provisions to require the accounting of uncertainty associated with emission factors, activity data and other estimation parameters applied in the calculations of emissions reductions or removals, consistent with IPCC guidance for national emissions inventories and past UNFCCC decisions related to accounting.
A6.4-SB009-A01 (methodologies)	4.9. Including data sources, accounting for uncertainty and monitoring requirements	59	Such provisions have already been elaborated elsewhere; methodologies should take advantage of past work in this regard and not unnecessarily repeat or inadvertently replace such provisions, as this could generate confusion, methodological inconsistencies, and accounting errors.	59. Mechanism methodologies shall contain or reference provisions requiring a listing of data parameters that need to be monitored throughout the crediting period. This may include the data that is directly measured where necessary on a sample basis, and the data that are collected from other sources such as official statistics, expert judgment, IPCC guidelines, and scientific literature. In this regard, methodologies shall contain provisions on monitoring plans related to the collection and storing of all relevant data needed to estimate baseline, project and leakage emissions, including provisions related to quality assurance and quality control.

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A6.4-SB009-A01 (methodologies)	4.10. Recognizing suppressed demand	62	Replace “will” with “shall”, for consistency with UNFCCC guidance. “BAU” should be avoided due to subjectivity, as recommended above.	62. The Supervisory Body will shall recognize suppressed demand under a situation where the BAU the applicable methodology cannot realistically provide the level of service required of the Article 6.4 activity by considering that the baseline scenario is not set based on the historical and continuation of the current condition, but rather based on an alternative that provides a level of service comparable to that provided by the Article 6.4 activity.
A6.4-SB009-A01 (methodologies)	4.10. Recognizing suppressed demand	63	Replace “will” with “shall”, for consistency with UNFCCC guidance. “BAU” should be avoided due to subjectivity, as recommended above. Assessment should occur first, and recognition should be case-by-case. Introducing benchmarks and default factors for exceptions should be avoided here, as it would prejudice the process set out in paragraph 64.	63. The Supervisory Body will shall recognize suppressed demand by including benchmarks and default factors in specific methodologies that may not be below BAU. The Supervisory Body and will shall assess, on an activity-by-activity basis, whether suppressed demand is a plausible situation in a given context.
A6.4-SB009-A01 (methodologies)	4.11. Taking into account policies and measures and relevant circumstances	67	Replace “will” with “shall”, for consistency with UNFCCC guidance.	67. The Supervisory Body will shall develop further guidance on how mechanism methodologies shall take into account policies and measures, and relevant circumstances.

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A6.4-SB009-A01 (methodologies)	4.12. Standardized baselines	73	<p>The conditions listed seem overly specific for this level of guidance, and the reference to “facilities” seems to prejudge the types of activities that may be subject to aggregation. Also, it invokes both the host Party and the Supervisory Body but does not specify how this determination would be made jointly or establish a process for doing so.</p> <p>This paragraph should be deleted and rewritten to apply more broadly to different types of activities, and to clarify the decision-making process for aggregation, thinking through the implications and relevant circumstances to which this should apply.</p>	<p>73. The host Party and the Supervisory Body should determine the level of aggregation taking into account the following: (a) A default level of aggregation shall comprise the facilities or equipment producing a similar type of output within the geographical boundaries of one Party or a specific subregion determined by the Party. The level of aggregation may be expanded to a group of Parties with similar circumstances relating to the output; (b) A default group of facilities should be disaggregated when significant dissimilarities exist in the performance of facilities or groups of facilities in the country/region. In this case, the disaggregation shall be carried out according to relevant criteria, such as scale of production, installed capacity or age of the facilities. Standardized baseline values should be determined for each group of similar facilities in this case; (c) Disaggregation should not result in standardized baselines with overlapping applicability.</p>
A6.4-SB009-A01 (methodologies)	4.12. Standardized baselines	74	<p>Precedents from the Voluntary Carbon Market in relation to baseline setting, should be considered in order to facilitate alignment. For this purpose, standardized baselines should allow for a validity period of no longer than six years, as this provides more flexibility to include different methodologies from different sectors and at the same time ensures that baselines are not outdated (which would be the case for a methodology requiring a too long period for the baseline update or not requiring it at all).</p> <p>According to the “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement”, paragraph 5, letter b), (ii) in the context of developing and approving new methodologies for the mechanism, the Supervisory Body should: “(ii) Consider the baseline and monitoring methodologies used in other market based mechanisms as a complementary input to the development of baselines and monitoring methodologies pursuant to chapter V.B of the annex (Methodologies).”</p>	<p>74. Standardized baselines shall include a default validity period of no longer than six three years, starting from the date of approval by the Supervisory Body. A host Party may propose a shorter or longer validity period, taking into account the specificity of sectors in which activities are undertaken, and by providing justification for the consideration of the Supervisory Body.</p>

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A6.4-SB009-A01 (methodologies)	5. Additionality demonstration	78	We propose to delete language that is overly restrictive or prejudices the law enforcement or outcomes of policies and measures.	78. Paragraph 38 of the RMP states that “Each mechanism methodology shall specify the approach to demonstrating the additionality of the activity. Additionality shall be demonstrated using a robust assessment that shows the activity would not have occurred in the absence of the incentives from the mechanism, taking into account all relevant national policies, including legislation, and representing mitigation that exceeds any mitigation that is required by law or regulation, and taking a conservative approach that avoids locking in levels of emissions, technologies or carbon intensive practices incompatible with paragraph 33 of the RMP”.

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A6.4-SB009-A01 (methodologies)	5. Additionality demonstration	80	The four elements listed should be considered collectively, as a composite set of indicators of additionality. Not all elements should be required in order to demonstrate additionality, since each element is sufficient on its own, or partial achievement of several elements may be judged to demonstrate the additionality of the methodology in specific circumstances. As written, this paragraph would prejudice and preclude the provisions in paragraphs 81-84 below, which should be avoided.	80. Mechanism methodologies shall contain provisions to require allow demonstration of additionality through the following elements: (a) Demonstration that the proposed activity would not have occurred in the absence of the incentives from the mechanism through an investment analysis (default approach); (b) An assessment of barriers to the implementation of the activity, such as the financial, technological, institutional barriers, taking into account all relevant national policies, including legislation and current practices within the activity sector and geographic area of the host Party, may be undertaken to complement the investment analysis referred above. If activity participants want to use barriers to demonstrate additionality for their activity, they shall: (i) Describe the barriers, including the reasons why investment analysis is not suitable; (ii) Provide evidence of the barriers and how the mechanism will help overcome the barriers; (iii) Include parameters in the monitoring plan to demonstrate how the barriers are overcome. (c) The proposed activity represents mitigation that exceeds any mitigation that is required by law or regulation, through a regulatory analysis conducted to assess whether the activity is mandated or triggered by applicable law or regulation. For this purpose, law or regulation applicable to the proposed activity that may require a certain technological, performance or management action shall be considered; (d) The proposed activity takes a conservative approach that avoids locking in levels of emissions, technologies or carbon-intensive practices incompatible with paragraph 33 of the RMP, including through an assessment of the scale, lifetime, and emissions intensity of the activity.

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A6.4-SB009-A01 (methodologies)	5. Additionality demonstration	83	Replace “will” with “shall”, for consistency with UNFCCC guidance.	83. The Supervisory Body will shall develop further guidance and tools for the demonstration of additionality, including through a stepwise procedure to address the elements in paragraph 80 above; potential standardized performance-based approaches for determining additionality for application in methodologies that take into account best available technologies or an ambitious benchmark approach. Mechanism methodologies may contain provisions that require the application of these procedures and approaches.
A6.4-SB009-A01 (methodologies)	5. Additionality demonstration	84	Replace “will” with “shall”, for consistency with UNFCCC guidance.	84. Simplified approaches for demonstration of additionality for least developed countries or small island developing States will shall be developed by the Supervisory Body when a request is made by a least developed country or small island developing State.
A6.4-SB009-A01 (methodologies)	6. Leakage	90	Replace “will” with “shall”, for consistency with UNFCCC guidance.	90. The Supervisory Body will shall develop a methodological tool for the implementation of paragraph 87 above.
A6.4-SB009-A01 (methodologies)	6. Leakage	91	Replace “will” with “shall”, for consistency with UNFCCC guidance.	91. For some types of activities, monitoring at jurisdictional level and use of a standardized baseline (or equivalent) is necessary to quantify and account for leakage. In addition, further work will shall be undertaken by the Supervisory Body to assess the implications of activities implemented outside national borders and transboundary activities