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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

About NEP

The Negative Emissions Platform (NEP) is a Brussels-based partnership of European and international organisations focused on carbon removals. Our members are primarily technology companies, but also include project developers, investors, carbon marketplaces, and buyers of carbon removals. We provide a forum in which diverse like-minded organisations actively collaborate to improve political and public recognition of carbon removals.

General remarks

NEP welcomes the Article 6.4 Supervisory Body’s call for input on the documents: i) requirements for the development and assessment of Article 6.4 mechanism methodologies; and ii) activities involving removals under the Article 6.4 mechanism.

A key area for improvement in both documents lies in clearly distinguishing between carbon removal credits and emission reduction credits within the Article 6.4 mechanism. While these credits should be considered separately (e.g. regarding monitoring & reporting, baselines), they are often blurred together in the documents, leading to ambiguity. Sections and paragraphs relevant to one may not necessarily apply to the other – this is particularly evident in the methodologies document. It is therefore imperative for the Supervisory Body to address this by incorporating a dedicated section on carbon removals.

Moreover, carbon removal activities are varied within themselves, including in regard to their monitoring, reporting and verification (MRV); storage duration; and risk of reversals. Given this, NEP calls on the Supervisory Body to establish activity-specific requirements that also address the granularity that is needed for the different activity types. This would create more trust and transparency in different carbon removal methods, ultimately facilitating carbon trading under the Article 6.4 mechanism.

NEP’s more detailed response to the two documents can be found in the table below.

0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Meths	4.1	18	Whilst it is assumed that this paragraph is meant for emissions reductions and carbon removals based on the 2021 Glasgow Agreement , the wording in this paragraph lacks clarity, in particular how it can be applied to carbon removals. There appears to be a disconnect on how baselines under removal activities could be dealt with. This should be further addressed by the A6.4SB.	

Call for public input – Template for input | [A6.4-SB009-A01 \(methodologies\)](#) or [A6.4-SB009-A02 \(removals\)](#)

<p>Meths</p>	<p>4.2</p>	<p>21-26</p>	<p>The previous ordering of the text did not speak to the RMPs as directly as it could, reducing comprehension for the reader. It also had requirements for methodologies to contain provisions for an outcome, not requirements for the outcome itself, thereby softening the text and potentially allowing for deviation from the RMPs. Finally, former para 26e has been deleted to avoid a problematic outcome whereby two data sources of unequal robustness defer automatically to the most conservative. This could be reincorporated with the caveat that where the data sets are equal in their robustness, the most conservative will be selected.</p>	<p>21. Paragraph 33 of the RMP states that “Mechanism methodologies shall (...) be real, transparent, conservative, credible (...)”.</p> <p>22. Mechanism methodologies shall contain credible methods for estimating calculating 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 upto date scientific information and reliable data, excluding extraneous cofactors affecting emission reductions or removals. Mechanism methodologies shall ensure real emissions reductions or removals through provisions which:</p> <ul style="list-style-type: none"> (a) Include robust, transparent and user-friendly measurement, reporting and verification systems; (b) Require the use of technical performance standards that are data driven; (c) Include 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) Adopt life cycle approaches and considering embodied emissions of materials and products, where relevant. <p>23. Mechanism methodologies shall contain provisions to require transparent descriptions of the source of the data used, the assumptions made, the references used and the steps followed in the estimation of the results of Article 6.4 activities, including equations where necessary.</p> <p>24. Mechanism methodologies shall contain provisions aimed at ensure the conservative estimation of emission reductions or removals from the measures applied, options chosen, or assumptions made, and shall not overestimate the emission reductions or removals from Article 6.4 activities.</p> <p>25. Mechanism methodologies shall contain provisions to ensure credibility by requiring Article 6.4 activities to have a robust monitoring and data capture system as well as a reporting system. Where secondary data is used, the mechanism methodologies shall contain provisions to require activity participants to provide justification that it is an appropriate and conservative source of data.</p> <p>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</p>
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				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 conservative emissions baseline when multiple sources of data and parameters are available to set the baseline;
Meths	4.3		This paragraph concerns establishing the selected baseline below business-as-usual (BAU). The financial implication of this section needs to be considered, and it is unclear how these provisions apply to removals. This section could include a hook that baselining includes an assessment of financial BAU spending for CDR and not only activity based.	
Meths	4.4		OMGE (overall mitigation in global emissions) and administrative fees under the A6.4 mechanism already amount to 7% of each transfer. It should be noted that given higher valuation of CDR projects, this amounts to substantial contributions by 'technical' carbon removal developers than for other carbon removal credits and emission reduction credits. Given the need to scale up permanent carbon removal solutions, the cost can be burdensome for developers. Therefore, a shift towards flat fee as opposed to a percentage-based approach would be encouraged.	
Meths	5		To provide clarity and to streamline the assessment process on additionality, NEP suggests the establishment of a 'positive list'. This list would delineate specific carbon removal activities that are inherently deemed additional when certain predetermined conditions are met. By outlining these activities, the Supervisory Body can offer clear guidance to project developers and stakeholders, facilitating smoother project evaluation and approval processes within the framework of Article 6.4.	
Meths	6	88	This paragraph could be clearer. In its current wording, it could be interpreted that activities that use any external equipment could potentially be liable for the embodied emissions related to that equipment if there is a competing use case.	
Removals	2.2	6(a)	As currently drafted, the paragraph locates the anthropogenic qualification immediately after the separation from the atmosphere component. This might preclude a number of biomass-based pathways such as bioenergy with capture with storage (BECCS), biochar or biomass burial whereby the initial separation of CO2 from the atmosphere is made through photosynthesis, albeit all subsequent activity including storage is anthropogenically driven. As such, it is suggested that "anthropogenic activities" be located at the end of the paragraph to apply to the overall process.	Removals are the outcomes of processes to remove greenhouse gases from the atmosphere and destroy or durably store them through anthropogenic activities.
Removals	3.1		To give clear guidance on the monitoring data & process requirements for a carbon removal certification framework, it is essential first to take a broader perspective and clearly define the object of service connected to a carbon removal certificate in a way that serves as legal reference point for contracting and regulations. The service associated with carbon removal is generally assumed to execute carbon removal activities and provide verifiable net removal quantification & auditable chain-of-custody documentation from "fixing from the air" to "sequestered durably" for a given value chain. For each category of carbon removal pathways, it should clear, where the point of the creation of the durable sink lies and to which extent, monitoring requirements extend beyond it to mitigate re-emission risks. The point of durable carbon removal storage creation should be connected to a sufficiently low risk of re-emission of the harmful GHG under common business practises. To complement carbon removal frameworks, there needs to be effective schemes in place to govern & incentivise the continued emission-avoiding stewardship of durable carbon sinks. This link has not been clearly established yet in the VCM or national schemes.	

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Removals	3.2	18	It remains unclear how post-crediting period monitoring would look like for different removal activities and how reversals would be addressed. Various carbon removal activities will possess distinct parameters, particularly those that securely store CO2 in stable conditions, which will influence monitoring demands. This will need to be addressed by the A6.4SB. NEP suggests that the A6.4SB are clearer that the risk of reversal for a given activity is a key component in deciding on the length of the post-crediting monitoring period and consider allowing methodologies more scope to give predefined conditions that should they be met allow for post-crediting monitoring to end without a submission to the Supervisory Body.	
Removals	3.6	General	Different jurisdictions already have mechanisms to address liability for reversals, for instance the EU with the CCS and ETS Directives. The Article 6 rules must ensure compatibility with these rules and avoid expensive, disproportional and unnecessary reversal mechanisms. Thus, the rules developed by SB Art 6.4 should allow for different regional solutions where such mechanisms already are in place.	
Removals	3.6	49	<p>Para 49 is pointing to the use of buffer pools and/or cancellation of A6.4ERs not directly related to the CDR activity seeking credits under the A6.4 mechanism. The A6.4SB is encouraged to reflect on the suitability of:</p> <ul style="list-style-type: none"> • A buffer mechanism and relevant % contribution levels. E.g. for CCS related activities, the Durban decision outlines i) refundability and ii) maximally 5% to be deducted towards a shared buffer pool by CCS related activities. Refundability of such a buffer deduction is crucial, as a large-scale CDR project (assuming 500Kt/a and 5% buffer at costs at 200\$/t results in yearly buffer contributions worth 5 millions. Over a 20-year timeframe, buffer values could mount towards 100M that could be reinvested towards additional Climate Mitigation in cases where proof of permanence allows to refund buffer contributions towards project developers) • A6.4ERs to be cancelled that stem from different projects. Whilst this could indeed lead towards higher flexibility for project developers, the use of credits from other A6.4 activities might undermine the crucial aspects of public acceptance and thus stand against a license to operate for some CDR projects that have high aspirations regarding the purity of any offering. As stated in Para 51, NEP welcomes careful consideration regarding the characteristics of A6.4ERs envisioned to contribute towards addressing reversals in full. Specifically, it is questionable if an A6.4ER stemming from a reduction-based mitigation project shall be eligible to contribute towards reversal remediation of a carbon removals project. 	