

Call for public input – Template for input	A6.4-SB009-A01 (methodologies) or A6.4-SB009-A02 (removals)
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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)
a64-sb009-a01 (Methodologies)	section 7	Para. 92	<p>There is a material risk of reversals over a relevant time frame in most types of carbon removal activities and therefore this issue must be properly addressed in the Guidance. The Guidance must ensure that the permanence of the reservoirs considered in removals is at least equivalent to the duration of the emissions into the atmosphere the ITMO is used to compensate [or that of the reservoir the emissions were released from]. Thus, land-based removals could be used to compensate for land-based emissions, based on the potential equivalence of the reservoirs, or for methane emissions due to its short atmospheric lifetime.</p> <p>The A6.4 rules must ensure that removal activities from which credits are issued ensure the reservoirs are maintained over at least over a time frame comparable to fossil fuel emissions which they may be used to compensate. If the reservoirs cannot be maintained over such a period with a high likelihood, then temporary credits or other solutions to deal with permanence and reversibility should be issued.</p>	

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Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
a64-sb009-a02 (removals)	3.4. Accounting for removals	27 - 29	<p>The CDM rules established the date of 12/31/1989 as the limit for there to have been some type of forest. Our suggestion is that the concept of forest should be amplified through ecosystem (i.e., savanna ecosystems are included) suppression or degradation, considering the IPCC conclusions at the IPCC Special Report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems. Furthermore, in the CDM there was no distinction between planted (i.e., a human-made plantation with non-native species) and native forests, and this rule should be maintained. Our suggestion is that a simple criterion be adopted, whose restriction should be focused on the absence of any forest 20 years before the project.</p> <p>Notwithstanding the above, no area of native vegetation subject to deforestation after 2020 will be eligible for future restoration projects under the SDM. Areas subject to degradation because of the impact of climate change, that does not result from direct human influence, may be eligible for restoration projects. The IPCC 2019 definition of degradation is a “negative trend in land condition, caused by direct or indirect human-induced processes including anthropogenic climate change, expressed as long-term reduction or loss of at least one of the following: biological productivity, ecological integrity or value to humans”.</p>	

