

Submission of YOUNGO on the Stakeholder interactions: Requirements for methodologies and activities involving removals

Contact email of submitter: climatefinance.youngo@gmail.com

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)
Meth	4.5	35-37	Recommendation: Increase the 2% cancellation rate of A6.4 carbon credits to a minimum of 5% or higher, increasing annually until 2050 and beyond.	Add a new paragraph after Paragraph 37: "The share of proceeds for adaptation shall be set at a minimum of 5% of A6.4 units issued, increasing annually, to aid adaptation efforts and ensure overall mitigation in global emissions."
Meth	4.2	21-26	Recommendation: Limit private sector purchase of A6.4 credits to "mitigation contribution" units only within the country where reductions occur. No offsets permitted.	Add a new paragraph after Paragraph 26: "Private sector entities shall be limited to purchasing "mitigation contribution" A6.4 units representing cancellations within the host country. A6.4 credits shall not be used as offsets."
Removals	3.4 or 3.5		Recommendation: Carbon removals under A6.4 should only offset residual emissions that cannot be eliminated, not extend fossil fuel reliance.	New paragraph in Section 3.4 or 3.5: "Carbon removal activities under the Article 6.4 mechanism shall be limited to offsetting residual emissions that cannot otherwise be abated. Removals shall not be used to enable the ongoing use of fossil fuels."
Removals	3.2 or 3.6		Recommendation: Exclude short-term removals. Require permanence over 300+ years, safeguards for indigenous rights.	New paragraph in Section 3.2 or 3.6: "Short-term or temporary carbon removals shall be excluded from the Article 6.4 mechanism. Robust rules shall be developed to ensure removals are permanent for a minimum of 300 years, with full protection of indigenous peoples' rights in alignment with international law."
Meth	4.2	21-26	Recommendation: Reject tonne-year accounting as it lacks scientific integrity. Removals in different times/locations are not necessarily equivalent.	New paragraph in Section 4.2 after Paragraph 26: The use of tonne-year accounting shall not be permitted as it lacks environmental integrity. Carbon storage of different durations and locations shall not be considered functionally equivalent."
Removals	3.4 or 3.5		Recommendation: Ensure A6.4 credits integrate with leading markets like EU CRC-F.	New paragraph in Section 3.4 or 3.5: "A6.4 removal credits shall be fully fungible with and integrated into other leading carbon removal certification frameworks and markets, notably the EU Carbon Removal Certification Framework."

0	1	2	3	4
Meths or Removals	Section no.	Para. no.	Comment	Proposed change (Include proposed text)
Removals	3.1, 3.6	52-56	Recommendation: Require industry-standard 10%+ buffer pools for NBS credits. Mandate replenishment, cancellation of unused buffers.	Proposed Change: In Paragraph 53, change "an amount of 6.4ERs proportionate to the issuing activity's reversal risk rating" to: "a minimum of 10% of 6.4ERs issued for nature-based solution (NBS) activities, proportionate to the activity's scientifically-determined reversal risk rating, shall be forwarded to the Reversal Risk Buffer Pool, which is a holding account that aggregates all contributions of Buffer 6.4 ERs. Activity participants shall be required to replenish the Buffer Pool following any reversals. Any unused Buffer 6.4 ERs shall be automatically cancelled at the end of the activity's final crediting period to maintain the Pool's integrity. "
Removals	3.4 or 3.5		Recommendation: Allow limited use of CDR to offset only unabatable residual emissions, not used to extend fossil fuel reliance. Revise to recognize some CDR potential with appropriate methodologies.	New paragraph in Section 3.4 or 3.5: "Limited use of carbon dioxide removal (CDR) technologies may be permitted under Article 6.4 exclusively to offset residual emissions that cannot be eliminated and not extend fossil fuel reliance. The Supervisory Body shall develop methodologies to appropriately incorporate certain CDR with high likelihood of long-term storage, reversing the statement that engineering-based removals cannot serve Article 6.4 objectives."
Removals	3.4, 3.5		Recommendation: Support development of engineered removals through subsidies, purchase agreements, policy incentives, with above limitations that they be used to offset only unabatable residual emissions, not extend fossil fuel reliance.	New paragraph in Section 3.4 or 3.5: "The development and integration of engineered carbon removals into the Article 6.4 mechanism may be supported through subsidies, advance market commitments, and policy incentives, subject to the restrictions on their use outlined in <i>[paragraph specifying the proposed change listed directly above]</i> ."
Meth	4.2	21-26	Recommendation: Ensure robust corresponding adjustments, including for removals integrated into products.	New paragraph in Section 4.2 after Paragraph 26: "Corresponding adjustments shall be rigorously applied to any transferred mitigation outcomes, including removals integrated into products, to uphold environmental integrity."
Meth	Sec 4.2 (Para 21-26) Sec 4.4 (Para 30-34)	Sec 4.2 (Para 21-26) Sec 4.4 (Para 30-34)	Recommendation: Exclude avoided deforestation, emissions avoidance, conservation enhancement (e.g. REDD+) from A6.4 as forests cannot be used as a justification to pollute.	New paragraph in Section 4.2 after Paragraph 26: "Avoided emissions from reduced deforestation, conservation, or other avoidance activities including REDD+ shall be excluded from eligibility under Article 6.4, as these do not represent additional mitigation to offset emissions."