

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)
A6.4-SB009-A02	3.1.	8	<p>Will the monitoring of removals also be mandatory for removals with biochar, i.e. the application of biochar as a soil amendment on fields?</p> <p>According to the CSI-Standard (EBC-C-Sink <a href="https://www.european-biochar.org/media/doc/139/c_en_sink-value_2-1.pdf">https://www.european-biochar.org/media/doc/139/c_en_sink-value_2-1.pdf</a>), once the biochar is applied to soil or included in traceable long-lasting materials it is assumed that the C sink will be preserved in a calculable and controllable way in the long term and there is no further monitoring of the sink.</p> <p>To generate a full C-sink, an accredited tracking system is required to record all carbon losses from the factory gate to the incorporation into the soil or a long-term stable material. However, no monitoring is taking place thereafter. Will this be according to article 6.4 or will it require constant monitoring, nevertheless? As there are often diffuse C sinks, e.g. when the biochar is mixed with compost and sold as fertilizer to farms and households, it gets very difficult to track this and would not be feasible to do the monitoring.</p> <p>EBC-C-Sink standard:</p> <p>“Incorporating biochar into substrates such as compost, litter, feed, fertilizer or cement, sand, clay, and lime is considered a creation of a carbon sink. From this moment on, the combustion of the biochar and thus the loss of carbon can be practically excluded.”</p> <p>“If the registration of the geographical location and site owner of the C-sink is not possible or practicable, but the biochar is nevertheless shown to have been introduced into a matrix that precludes combustion (e.g., compost, biogas slurry, cement, etc., see above), the sink is considered a diffuse C-sink. It is not possible to physically verify the fate of the C-sink. Nevertheless, it can safely be assumed that the carbon used in this way remains a terrestrial C-sink.”</p>	<p>We propose to exempt biochar application to soils (and other stable matrixes) from the need to monitor reversals, since it is scientifically proven that once mixed into the soil, a defined proportion of charcoal is a permanent carbon sink that is not mineralized over 100 years. (For definition of this proportion please see next comment)</p>

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A6.4-SB009-A02	3.6.3.1.	52	<p>EBC-C-Sink (<a href="https://www.european-biochar.org/media/doc/139/c_en_sink-value_2-1.pdf">https://www.european-biochar.org/media/doc/139/c_en_sink-value_2-1.pdf</a>):</p> <p>“The life cycle of the final C-sink or the degradation of the biochar in the final Csink must be accounted for. When incorporated into soils or blended into substrates and feeds that will eventually be incorporated into agricultural or urban soils, the annual rate of biochar degradation must be applied according to the H/Corg ratio of the biochar (Camps-Arbestain et al., 2015; IPCC, 2019) and must be at least 0.3%. In this way, the C sink’s annual evolution can also be specified over more extended periods of 100 or 250 years or traded in annual tranches.”</p> <p>According to the standard, a semi-persistent part of the biochar is already accounted for, so only about 75% of the generated CO<sub>2</sub>-removal potential can be used for permanent removal.</p> <p>Will there be further need for a buffer pool in this case?</p>	<p>The annual rate of biochar degradation of charcoal mixed into the soil can be defined as reversal. However, instead of applying a buffer pool, we propose to introduce the requirement to monitor the H/Corg ratio of the applied biochar and to introduce a default factor of 75% of the generated CO<sub>2</sub>-removal potential to calculate permanent removal in the relevant Methodology.</p>

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A6.4-SB009-A01	5	80	<p>We reference to section (c) requiring that the “proposed activity represents mitigation that exceeds any mitigation that is required by law or regulation” and point out that these requirements may exclude much needed activities and penalise host Parties with strict laws and regulations.</p> <p>If laws and regulations are systematically not enforced and noncompliance with those requirements is widespread in the country, the proposed activity may well be regarded as additional even though there are laws and regulation in place.</p> <p><b>Example:</b></p> <p><i>A host country requires the treatment of certain types of waste by law (e.g. agricultural residues, municipal waste etc.). The law is, however, not enforced and noncompliance has been widespread for years throughout the entire country. A proposed activity aiming to avoid methane emissions by treating this waste, would not be regarded as additional, as treatment is required by law.</i></p> <p><b>CDM TOOL01 “Tool for the demonstration and assessment of additionality” Version 7.0.0 provided some room for manoeuvre for such cases in section no. 4.2.2. paragraph 25. &amp; 26.:</b></p> <p><i>“If an alternative does not comply with all mandatory applicable legislation and regulations, then show that, based on an examination of current practice in the country or region in which the law or regulation applies, those applicable legal or regulatory requirements are <b>systematically not enforced and that noncompliance with those requirements is widespread in the country.</b> If this cannot be shown, then eliminate the alternative from further consideration.</i></p> <p><i>If the proposed project activity is the only alternative amongst the ones considered by the project participants that is in compliance with mandatory regulations <b>with which there is general compliance</b>, then the proposed CDM project activity is not additional.”</i></p> <p>We acknowledge the importance of paragraph 80 and we are aware that any “softening” of the formulation may open the gates for activities that are not additional.</p> <p>Nevertheless, we propose to offer some leeway and enable a case-by-case decision by the SB to avoid that much needed investments are excluded while ensuring that exceptions to the rule are rare and justified.</p>	<p><b>Addition:</b></p> <p><b>“If those requirements are systematically not enforced and noncompliance with those requirements is widespread in the country, activity participants shall demonstrate additionality by providing evidence for this.”</b></p>

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<p>A6.4-SB009-A01 ( &amp; A6.4-SB009-A02)</p>	<p>7</p>	<p>93</p>	<p>We understand that the guidelines outlined in A6.4-SB009-A02 are also valid for any reversals and non-permanence issues of emission reduction activities.</p> <p>For emission reduction activities that indirectly protect forests (e.g. household biogas digesters replacing firewood for cooking or any efficient cookstove activity reducing the need for firewood) we see non-permanence issues that are challenging to address. While the firewood savings can be monitored with reasonable assurance, it is much harder to assess the state of forests that are preserved through the project. The activity boundary may be defined as the entire host country (e.g. small-scale biogas digesters implemented in all regions of the country) and firewood in the baseline situation may be sourced from a variety of regions. Considering that forest resources may be exploited to some degree in any case (natural disturbance risks and anthropogenic factors such as wildfires, diseases, and land use change), it is difficult to assess which fraction can reasonably defined as a reversal relating to the emission reduction activity.</p> <p>Under the CDM these issues were neglected and therefore subject to criticism. We welcome the intention of the SB to define clear guidelines for these cases.</p> <p>At the same time, we wonder how practical the current guidelines will be for the above-described cases:</p> <ul style="list-style-type: none"> <li>- How are reversals supposed to be monitored or observed?</li> <li>- How are reversal-related notifications and corrective measures supposed to be implemented?</li> <li>- How to define the time frame for post-crediting monitoring without making the activity unviable (potential future reversals will only be negligible or remediated after the life span of the preserved trees)?</li> </ul> <p>Considering the difficulty of matching reversals (exploitation of forest resources) to the individual emission reduction activity that indirectly contributes to the preservation of forest resources, we propose to address reversal risk and reversal through a simplified – yet conservative – approach.</p> <p>A discounting approach can be a viable option to ensure conservative emission reduction estimations and feasibility for project developers. A very simple solution would be to add some kind of “non-permanence factor” to the leakage emission factor to increase the project emissions. This factor can be based on data about natural disturbances and anthropogenic factors and might be validated by the DOE or provided by the crediting programme in form of default values. Buffer pool contributions, post-crediting monitoring, reversal-related notifications, corrective measures etc. would not be required since a conservative share of reversals is already integrated and subtracted from the calculated emission reductions through the non-permanence factor.</p> <p>To address the identified non-permanence issues (they will vary depending on the activity and region) and argue for a reduced “non-permanence factor”, project developers can include measures in the project design that reduce the likelihood of reversals for the activity. These measures (e.g. biomass residue palletisation and storage, reforestation, forest fire protection, wetland and ecosystem restoration etc.) should be defined in collaboration with the host government and local stakeholders to align with relevant national strategies and policies. Since these measures will be included in the project design and implemented on an ongoing basis, they have a prophylactic rather than a corrective character.</p>	

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