

Submission of Views

Honduras on behalf of the Coalition for Rainforest Nations

Guidance on the mechanism established by Article 6.4 of the Paris Agreement:

Activities involving removals and emission avoidance and conservation enhancement activities

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KEY CONSIDERATIONS

1. Avoiding duplication and ensuring climate action at the right speed and scale

- The REDD+ mechanism as identified in Article 5 of the Paris Agreement is designed to contribute to achieve its global objective, in particular by fulfilling the following conditions:
 - It is the only sector-wide instrument under the UNFCCC that is currently producing GHG emission reductions and CO₂ removals at high speed and scale as needed to stay within the 1.5C path¹;
 - As such, any REDD+ mitigation outcome can only be generated once all significant² forest-related emissions and/or removals are considered at the national level through Article 5 of the PA and the same should apply for all sectors;
 - It is a mechanism where baselines are already established at the national level³ and based on a set of already agreed decisions that

¹ Article 4 of the Paris Agreement calls for:

- Developed country Parties should continue taking the lead by undertaking economy-wide absolute emission reduction targets (paragraph 4)
- Developing country Parties should continue enhancing their mitigation efforts, and are encouraged to move over time towards economy-wide emission reduction or limitation targets in the light of different national circumstances (paragraph 4)
- All Parties to strive to formulate and communicate long-term low greenhouse gas emission development strategies (paragraph 19)

² Decision 12/CP.17, Annex, paragraph c, notes that significant carbon pools and/or activities should not be excluded from REDD+ baselines, *i.e.* forest reference emission level/forest reference level.

³ Subnational scale is allowed as interim measure only, per COP decisions 1/CP.16, 12/CP.17 and 11/CP.19.

- provide for a detailed and robust national MRV system to generate REDD+ results⁴;
- On the contrary, methodologies at the project level in the forest sector have failed since credits are assigned for activities that are not transformative, i.e. they are undertaken in small portion of the territory while the rest of the country is ignored where emissions may be increasing;
 - Removals activities in the context of forest are already captured in Article 5.2 of the PA and the work of the A6.4 SB shall focus on technological removals only.

2. Focusing on climate action that reduces atmospheric CO₂ concentrations

- In relation to emissions avoidance, its methodological basis is contrary to the Paris Agreement goals since emissions avoidance does not represent emission reductions nor removals. According to decision 2/CMA.3, ITMOs are defined as emission reductions or removals⁵;
- Further, emissions avoidance approaches are not aligned with the Paris Agreement, since they do not lead to a “reduction of emissions levels in the host Party”⁶. Emissions avoidance only exist as a result of extrapolating the risk of deforestation from one place to another. Even if all emissions are “avoided”, a country’s national emissions may still increase. Emissions avoidance do not lead to emissions reductions compared to a previous emissions level;
- The CfRN is of the view that emissions avoidance should not be eligible under the Article 6, paragraph 4, mechanism.

⁴ Paragraph 7d of decision 3/CMA.3, indicates that ‘reporting by host Parties on their Article 6, paragraph 4, activities and the Article 6, paragraph 4, emission reductions issued for the activities, while avoiding unnecessary duplication of reporting information that is already publicly available’.

⁵ Decision 2/CMA.3, Annex, paragraph 1.

⁶ Article 4, paragraph c, of the Paris Agreement.