

Supervisory Body

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SBM016 annotated agenda and related annexes

Response to “Call for input 2025 - Issues included in the annotated agenda and related annexes of the sixteenth meeting of the Article 6.4 Supervisory Body”, with respect to A6.4-SBM016-AA-A11 - Revision of activity standard and validation and verification standard for projects and programmes of activities, specifically A6.4-SBM016-AA-A12, draft Article 6.4 activity standard for projects

Thank you for the opportunity to comment on the draft revised Article 6.4 activity standard for projects Version 02.0.

To effectively support climate action, the Article 6.4 standards need to balance rigour with practicality. Some requirements in this draft standard, especially the risk assessment and post-crediting monitoring, appear unnecessarily onerous and will create a significant disincentive for land-based removal projects, which will therefore limit the mitigation achieved, and preclude the environmental and social co-benefits that can be delivered by land-based projects.

Specifically:

Re 6.5.6 “addressing non-permanence”

- The risk of loss of stored carbon applies to fossil CCS projects just as it does to removal projects, so this section should be expanded to also encompass emissions reduction projects that involve capture and storage of fossil carbon.
- The risk rating should not be applied to “avoidable” (ie intentional) reversals. If the concern is the possibility of “bad actors” ie non-compliance with permanence provisions, then I suggest this risk should be considered in calculating the required buffer.
- For efficiency, the timing of review of the risk assessment should be aligned with the timing of monitoring and verification events.

Re 6.5.8 “monitoring plan”

- 51^{bis}, 57^{bis} Also applies to emissions reduction projects that involve capture and storage of fossil carbon
- Monitoring during the crediting period is necessarily comprehensive. Post crediting, the same level of monitoring is not required. Rather, the focus should be on identifying and reporting instances of reversals, and otherwise presenting evidence that no event likely to cause a reversal has occurred.

7.4 Reversals related actions

The concept of an “observed event involving the release of stored GHGs that could potentially lead to a reversal” is rather obscure. Does it mean “event that could pose a risk of reversal”? This section should be revised for clarity. As it appears to relate specifically to risk of reversal, and is therefore only relevant to removals projects, this text would be better placed in a separate Annex, that focuses on removal projects.

8 Implementation and monitoring

92^{bis} 93^{ter} Also applies to emissions reduction projects that involve capture and storage of fossil carbon. Post-crediting monitoring should focus on detection of reversals, and not involve the same detail and frequency as monitoring during crediting period.

10. Post-crediting monitoring and reporting

- As noted above it is appropriate that post-crediting monitoring should focus on detection of reversals, and not involve the same detail and frequency as monitoring during the crediting period.
- This section could be placed in an annex specifically related to removals projects.

These issues were raised in previous feedback to the Supervisory Body, but not adequately addressed.

Consistent with the guidance from CMA provided at COP29, the Supervisory Body should consider input from scientific and technical experts, assess the likely level of participation from land-based and technological removals, and consider feedback submitted in previous consultations on inclusion of land-based removals in Article 6.4. The standards should be revised to ensure broad sectoral participation, to maximise uptake.

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