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Sent: Monday, May 5, 2025 6:42 PM
To: A6.4mechanism-info <A6.4mechanism-info@unfccc.int>
Subject: SBM016 annotated agenda and related annexes

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Dear UNFCCC Secretariat,

We are writing to respectfully request the opportunity to discuss the current approach to Monitoring, Reporting and Verification under the Article 6.4 mechanism of the Paris Agreement. [Isometric](#) is a carbon removal standard and registry built to ensure the transition to carbon removal happens responsibly and fast.

While we understand that the UN has made the decision to develop a high-integrity standard - and we welcome all efforts to meet our current climate goals - we are concerned that the current process for developing and approving methodologies may be challenging to operate in practice.

As we understand it, under the current process the Methodological Expert Panel (MEP) is developing an overarching standard for the approval of eligible carbon removal methodologies. This standard will govern critical areas including permanence and reversal risk, baseline setting, financial additionality, and leakage.

Under the current system, as we understand it:

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- Legacy methodologies from the Clean Development Mechanism are being reviewed for potential
- transfer on the basis of standard.
- External organizations can now submit
- [new](#)
- [methodologies](#) using the official methodological proposal form and a Project Design Document (PDD) for
- a proposed activity.
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These will then be reviewed by the MEP and the supervisory body against the overarching standard and approved on that basis.

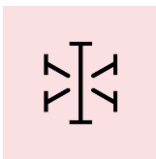
As a registry and standard with experience operating in the voluntary market for removal credits we think this approach will be challenging for the UNFCCC to manage in practice. We update our methodologies very frequently - at least every 6 months on the basis of the latest scientific developments - and this is an extremely resource intensive process.

In addition, the structure seems to inadvertently place the burden of defining methodological standards onto individual project proponents, whose primary objective is understandably project delivery rather than rule-making. As a result, there is a risk that methodologies may be shaped by the immediate needs of specific projects. We believe the UN would be better served leveraging the expertise of existing registries within the VCM - either by approving registries at a programme level or considering their specific protocols as part of the assessment process.

We would welcome the opportunity to speak to you about this vital issue and share our experience of providing MRV services for the Voluntary Carbon Market.

Sincerely,
George Robinson, Policy and Partnerships Manager, Isometric.

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