



05 May 2025

Article 6.4 Supervisory Body  
United Nations

Via Email: [A6.4mechanism-info@unfccc.int](mailto:A6.4mechanism-info@unfccc.int)

**RE: Call For Input 2025: Issues Included in the Annotated Agenda and Related Annexes of the Sixteenth Meeting of the Article 6.4 Supervisory Body**

To Supervisory Body,

The National Farmers' Federation (NFF) appreciates the opportunity to comment on the matters being considered by the Article 6.4 Supervisory Body.

While the Removals Standard (A6.4-SBM014-A06) is not listed on the Agenda, we note that the Draft Activity Standard explicitly incorporates elements of it. Embedding such requirements risks importing the full weight of A06's post-crediting monitoring and reversal obligations, without adequate scrutiny or adjustment.

Our key concerns include:

- **The use of monitoring reports for reversal reporting is unnecessary and imposes an overwhelming cost burden on the forest and land sector.** Carbon stocks in the agriculture and land sector naturally fluctuate due to seasonal and ecological variability. Reversals can be effectively detected through modelling or satellite data, without the need for costly, full-scale monitoring reports involving direct field-based measurements. Such an approach adds unnecessary complexity and compliance cost without corresponding environmental benefit and introduces significant investment risk for land-based projects.
- **Paragraph 43 of the Draft Activity Standard directly imports obligations from the Removals Standard (A6.4-SBM014-A06), requiring reversal risk assessments “aligned with the provisions of the Removals Standard”.** This results in layered monitoring requirements, including post-crediting obligations, for land-based removal activities. The effect is a disproportionate compliance burden on agriculture and production-integrated forestry activity projects. These are the very project types that offer significant co-benefits, including biodiversity enhancement, rural employment, and landscape resilience. Yet under the current approach, such projects are at risk of being excluded due to cost, complexity, and regulatory uncertainty.

Article 6.4 must not only ensure environmental integrity but also enable broad and practical participation from all sectors. We note that the Article's mandate is to facilitate wide sectoral inclusion under the Paris Agreement. We urge the Supervisory Body to reconsider both the structure and ambition of the current draft. It must reflect land sector realities, implement fair and risk-proportionate monitoring approaches, and avoid embedding obligations that discourage credible and scalable landholder participation.

Yours sincerely,

**TROY WILLIAMS**  
Chief Executive Officer