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Article 6.4 Supervisory Body  
Email: A6.4mechanism-info@unfccc.int

Dear Supervisory Body

**Draft Standard – Activity Standard for Projects (A6.4-SBM016-AA-A12)**

The Forestry and Forestry Products Sector in South Africa would like to raise concern about the text in the draft activity standard A6.4-SBM016-AA-A12 - Draft standard: Article 6.4 activity standard for projects that specifically applies to reversal reporting and monitoring and reporting.

A key concern is that this focus on reversals can lead to double counting as the effect of the reversal has already been included in the calculation of the net change of the pool – as defined by 30(e). As the accounting of removals (paragraph 30a) define the net change as the difference between the sum of change of each pool between the baseline scenario and the activity scenario, any gross reversal will be included in in this calculation. There is no requirement to report gross removals and gross emissions or gross reversals, and in many cases, it will be impossible to calculate the gross changes or fluxes accurately in the land sector (and forestry in particular). Without a clear definition of what exactly a reversal is, sale of land can also be easily included as a reversal.

Using monitoring reports (and the associated monitoring and verification costs) is not necessary for reversal reporting and would represent an overwhelming cost burden in the forest sector as well as an investment risk, thus excluding participation of the land sector in Article 6.4. The mandate of Article 6.4 is to allow for wide sectoral inclusion under the Paris Agreement. A different form of reporting is required and appropriate for reversal reporting, especially in the post-crediting period.

The benefits of the forestry and forestry products sector and contribution to climate change, biodiversity and socio-economic development are well recognised in South Africa. It is essential that this contribution is also recognised internationally through Article 6.4 and the role that nature-based solutions play in meeting global targets.

The sector is happy to continue to support the Supervisory Body in developing frameworks that achieve the highest standards of environmental integrity that can underpin the development of the forestry and forestry products sector.

We thank you for consideration of these concerns and look forward to engaging further on this critical issue.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jane Molony". The signature is fluid and cursive.

**Jane Molony**  
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