

Thank you for providing an opportunity to comment on the proposed Article 6.4 Activity Standard.

It should be noted that there was inconsistent use of terminology throughout the standard which will need to be rectified as standards must use consistent and well-defined terminology to avoid confusion and mis-use of the standard.

Specific comments:

#### **Section 6.5.6 Addressing non-permanence**

Non-permanence is a broader issue than just removals projects. Change to 'projects that are subject to reversals of emissions reductions or net removals' or similar.

It is unclear why avoidable risks need to be listed or included in the risk rating. The list of avoidable removals will be long and should have been dealt with explicitly in the project. For example, for the land sector, avoidable removals can be mitigated/addressed using a buffer pool.

Timeframes should also be consistent for each of reporting and monitoring, the risk assessment review should be at the end of the crediting period.

#### **Section 6.5.7 Estimation of emission reductions or net removals**

Challenges are likely to arise when trying to split projects into net removals and emissions reductions as there is a grey area/overlap between the two, e.g. reduced harvesting will increase net removals (as more growth) but decrease emissions reductions. It is not clear why the standard authors have separated out the two, and what is gained from doing this.

#### **Section 6.5.8 Monitoring plan**

Suggest that a separate approach is used to detect reversals and to quantify reductions/net removals in the crediting periods. There are likely to be different approaches needed to do both well.

#### **Section 7.3.3.4**

Given my suggestion to separate reversal detection from quantify reductions/removals then suggest adding a plan to detect reversals as well.

#### **Section 7.4 Reversals related actions**

Unclear why an 'observed event' terminology is being used. I would suggest that a section/standard or something similar that addresses non-permanence in projects that involve GHG reservoirs. Otherwise, this will be problematic for the land sector which I assume is unintended by the authors of this draft standard.

#### **Implementation and monitoring**

#### **Section 8.1 General requirements**

It appears as if the land sector is being disadvantaged in this section, again I assume unintentionally.

Monitoring reports should not be used for reversals reporting, there should be a separate standard for addressing non-permanence, and I would suggest that the monitoring frequency is at least 5 years for all activities subject to reversals.

I am unclear in this section as to what sets the monitoring frequency. The removal standard seems to use a risk rating but here it seems like the methodology is what dictates the monitoring reporting frequency.

#### **Section 8.7 Calculation of emission reductions or net removals**

Please see comment in Section 6.5.7 Estimation of emission reductions or net removals as don't believe there is any rationale for separating net removals and emission reductions given the challenges with distinguishing them and not sure what value it adds.

#### **Section 9 Renewal of crediting period and Section 10 Post-crediting monitoring and reporting**

As noted early, the monitoring reports should not be used for reporting reversals. A dedicated standard should be developed for non-performance.