Stakeholder's Input to the Annotated Agenda and Annexes for consideration of the Supervisory Body at its Seventeenth Meeting (SBM017)

This submission presents Conservation International's recommendations for consideration by Supervisory Body in response to the *"Call for input 2025 - Issues included in the annotated agenda and related annexes of the seventeenth meeting of the Article 6.4 Supervisory Body",* and it addresses specifically the "*A6.4-MEP007-A02: Draft Standard Addressing suppressed demand in mechanism methodologies"* and the "*A6.4-MEP007-A03 - Concept note: Applicability of removal guidance to emission reduction activities and vice versa."*

COMMENTS ON THE DRAFT STANDARD ADDRESSING SUPPRESSED DEMAND IN MECHANISM METHODOLOGIES

Text	Comment	Proposed change
28. Mechanism methodologies shall use the provisions in the Baseline Standard to determine the baseline scenario and the baseline technology and/or practice for the suppressed demand baseline, subject to the following requirements: (a) Rather than a service level that reflects existing conditions or a BAU scenario, the baseline shall be determined for the lower of: (i) The level of service for meeting BHN; or (ii) The level of service delivered by the mitigation activity;	Please clarify the statement, "the level of service delivered by the mitigation activity".	Please clearly define "level of service" delivered by the mitigation activity.

COMMENTS ON THE CONCEPT NOTE: APPLICABILITY OF REMOVAL GUIDANCE TO EMISSION REDUCTION ACTIVITIES AND VICE VERSA.

Text	Comment	Proposed change
15. This section specifies that mechanism methodologies shall contain provisions that require that the baseline selected shall be demonstrated as being below business as usual. The MEP notes that paragraph 28 of this section refers to emission reduction activities. The provisions in the "Standard: Setting the baseline in mechanism methodologies" 7 apply to mechanism methodologies related to	The principle that a baseline should be "**below business-as-usual**" is broadly appropriate for emission reduction activities, where a lower baseline (fewer projected emissions) results in fewer credits issued and therefore represents a conservative approach. However, for AFOLU removal	It would be helpful for future revisions of the baseline standard to explicitly recognize this distinction and avoid applying a uniform definition of conservativeness (as a lower baseline).

emission reductions and net removals, including ensuring that the selected baseline is below business-as-usual. The main rationale is that the various possible reasons for setting baselines below business-as-usual (ensuring conservativeness, providing incentives for implementing mitigation technologies with lower emissions, ensuring that host Party countries can use part of the mitigation outcomes to achieve their own NDC, etc.) equally apply to activities involving removals and emission reduction activities. The MEP notes, however, that the baseline standard may be amended in the future to incorporate further specific considerations for activities involving removals.	activities, this logic does not directly apply. In these cases, the baseline reflects the expected accumulation of carbon in the absence of the project, such as through natural regeneration. Here, **setting a higher baseline**—meaning assuming more carbon would have been sequestered without the project—**results in fewer net removals** being credited. In this context, a higher baseline is actually, the more conservative choice.	
16. This section states that mechanism methodologies shall contain provisions for contributing to the equitable sharing of mitigation benefits between participating Parties, including the application of conditions specified by the Designated National Authorities (DNAs) of the host Party. The MEP notes that the provision described in paragraph 31(a) of this section refers to emission reduction activities but does not exclude activities involving removals. The MEP is of the view that this section should apply to both activities involving removals and emission reduction activities. The main rationale is that the provisions required to demonstrate equitable sharing of mitigation benefits between participating Parties should also support the sustainable development objectives of host Parties, whether the activities involve emission reductions or net removals	The broad term, “equitable” can be interpreted in many ways depending on political, economic, or cultural perspectives.	Suggest that the text clarify what is meant by "equitable" in this context.

39. This section specifies that activity participants shall apply robust social and environmental safeguards to minimize and, where possible, avoid negative environmental and social impacts of the activity in accordance with the requirements referred to in this section. The MEP notes that paragraph 10 of the Removals Standard refers to activities involving removals and emission reduction activities with reversal risks under the Article 6.4 mechanism. Therefore, the MEP is of the view that this section should apply to both activities involving removals and emission reduction activities.	Avoidance of other negative environmental and social impacts and respecting human rights and the rights of Indigenous People.	Suggest that the SBM consider going further. Rather than focusing solely on minimizing harm, the guidance could explicitly encourage the prioritization of project types that generate positive social and environmental co-benefits.

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