



Dear Members of the Supervisory Body,

We thank the Supervisory Body for considering stakeholder input in preparing the current draft of the non-permanence standard. These comments are submitted on behalf of the members of the Beyond Alliance, a coalition of companies committed to advancing the scale, integrity, and impact of market-based climate solutions. The views expressed reflect the perspectives of our corporate members. Our members bring diverse viewpoints and the positions outlined here summarize areas of broad alignment and, in some cases, present a predominant perspective rather than unanimous agreement.

The decisions under consideration are of critical importance, demonstrated by the unprecedented level of engagement during recent consultations. The outcomes will not only shape the Paris Agreement Crediting Mechanism but will also have wider implications for global climate action and market dynamics. We therefore urge the Supervisory Body to be deliberate as it adopts rules that both safeguard integrity and enable scalable, practical solutions.

1. Process and stakeholder engagement

We share the concerns raised by many stakeholders regarding the consultation process—particularly with respect to transparency, accessibility, and opportunities for meaningful engagement. More than one-third of respondents to the initial consultation expressed similar concerns. The consultation periods have been short, the draft text is dense and technically complex with opportunities for differing interpretations, and opportunities for the MEP to engage directly with stakeholders to explain the draft and answer questions have been limited. These shortcomings are further illustrated by the fact that our own comments are not being submitted using the formal input template, as that template was not made available when the consultation was launched. These challenges are similar to those observed during the development of the removals standard, which was ultimately noted but not adopted at COP29. We see an urgent need for the Supervisory Body to adopt more inclusive, transparent, and iterative processes for future stakeholder engagement, particularly as it signals its intent to explore work related to risk assessment tools and the role of insurance programs in addressing reversal risk.

2. Treatment of land-based projects, horizontal stacking and the potential role of a Permanence Trust



As currently drafted, the requirement for essentially indefinite post-crediting monitoring obligations creates significant barriers for participation from land-based projects. As we interpret the draft standard, one potential solution lies in Section 3.5.3, which allows for horizontal stacking—i.e., “remediating” credits that fail to meet the ‘negligible risk’ threshold with credits that meet this threshold based on modeling assumptions, or simply replacing land-based credits if/when there is a reversal. We welcome the inclusion of horizontal stacking as one potential pathway, and at least two members of our coalition have indicated confidence in their ability to implement this approach in practice today.

At the same time, the majority of companies consulted in developing this response consider horizontal stacking unviable, as it can create future unfunded liabilities. There is serious concern that the post-credit monitoring and negligible risk requirements in the current draft would discourage the purchase of land-based credits, which under such conditions would be treated by market participants as “temporary credits.” Addressing this unfunded liability, and thereby enabling wider participation in land-based projects, will likely require the availability of additional mechanisms that transfer this risk at the point of purchase.

We support efforts by the Supervisory Body to explore a range of mechanisms that ensure robust reversal risk assessment and management systems, which adequately evaluate and mitigate the risk of sequestered carbon dioxide being released, coupled with enforceable commitments to address any reversals. This may include instruments including but not limited to private insurance, surety bonds, a for purpose trust, or buffer mechanisms. In particular, one such instrument, which our members encourage the Supervisory Body to explore, is the development of a Permanence Trust, to be designed and managed by PACM. A Permanence Trust functions as a pooled financial mechanism designed to ensure long-term climate benefits by covering the risk of carbon reversal. Rather than requiring individual projects or buyers to manage monitoring and reversal risk indefinitely, the trust aggregates resources—through defined, up-front contributions at the time of credit purchase—that are then invested and managed for the long term. *If* a reversal occurs, the trust deploys its resources to remediate the loss, ensuring that the environmental integrity of the credit is preserved. By pooling contributions across many buyers and projects, the trust creates economies of scale, spreads risk, and provides long-term assurances that would otherwise be difficult for individual entities to bear. An example of one approach is reviewed in [this white paper](#).

We therefore recommend that the Supervisory Body explore a suite of mechanisms that may be eligible for managing reversal, including the Permanence Trust concept as a



potential solution. We note the Supervisory Body has already signaled an intent to explore the role of insurance programs, and encourage a dedicated program to explore the role of a permanence trust.

3. Post-crediting monitoring requirements and permanence tools

While not unanimous, the majority of our members encourage the Supervisory Body to adopt more feasible post-crediting monitoring requirements, recognizing that the MEP interprets that this may require revisiting the Removals Standard, as noted by one MEP member (page 7). Stringent safeguards can be maintained while enabling a full suite of reversal remediation tools —buffer pools, permanence trusts, and insurance products—to meet defined thresholds.

We note that the Integrity Council for Voluntary Carbon Markets (IC-VCM) has adopted a durability threshold of 40 years, and dialogue is rapidly evolving toward 100-year permanence thresholds. We view this trajectory as a potentially appropriate balance between rigor and feasibility, enabling land-based solutions to contribute meaningfully alongside other approaches. Many of our members encourage the Supervisory Body to start with a 40-year durability threshold in the context of assessing risk of reversal, aligned with IC-VCM, and further encourage the Supervisory Body to consider a continuous improvement framework. Under continuous improvement, progressively stricter durability thresholds may be established over time as methodologies, technologies, and tools develop to strengthen the market’s ability to monitor and address reversals—without unduly constraining market participation or slowing the deployment of capital into climate initiatives today.

4. Potential exclusion of nature-based solutions

Many members share the concern, as raised by one MEP member (Page 7), that the draft non-permanence standard could effectively exclude land-based approaches due to the combination of post-credit monitoring obligations and strict negligible risk thresholds. While we recognize that the MEP interprets its flexibility to be constrained by decisions made during development of the Removals Standard, most members support revisiting those earlier decisions, as necessary, to ensure that the framework is practical and inclusive of the full suite of solutions needed to achieve the goals of the Paris Agreement.

As noted by the more than 100 scientists who are signatories to this [public letter](#), durability without scale is insufficient to achieve Paris Agreement climate targets. The



currently proposed pathway alone may be too narrow to enable meaningful participation from the land sector in practice.

5. Thresholds for negligible risk

The most recent draft also creates barriers by setting a strict negligible risk threshold of 0.1–2.5%. These levels do not reflect the outcome of public consultation, in which a majority of stakeholders either disagreed with the proposed options or supported a higher threshold of 5%. Adopting the most stringent possible thresholds risks unnecessarily constraining the market and limiting capital deployment across the portfolio of solutions urgently required to meet global climate goals.

Conclusion:

In sum, we align with the Supervisory Body’s objective of adopting a framework that safeguards rigor and integrity while enabling practical implementation. We encourage the Body to take the necessary time to reach a decision informed by more meaningful stakeholder input. By recognizing a suite of permanence tools—including buffer pools, insurance products, and a Permanence Trust—the Body can address unfunded liabilities, provide cost certainty for buyers, and ensure land-based solutions contribute alongside other approaches to the goals of the Paris Agreement.