



CALL FOR INPUT

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Instruction: **Enter your input in the table below.** Stakeholders **must** submit their comments by the established deadline and strictly use this commenting template to ensure their input is duly considered. The use of AI-generated content is **prohibited**, as such submissions frequently lack relevance and fail to address the specific issues presented in the published documents.

Document reference number and title: A6.4-MEP008-A03. Draft Standard: Addressing non-permanence and reversals (version 02.2)				
Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	The Ministry of Water and Environment(MWE), and particularly, the National REDD+ Secretariat is grateful to the fact that an opportunity has been granted by the Supervisory Body of the Article 6.4 Mechanism to provide comments to the revised Draft Standard on Addressing Non-Permanence and Reversals Version 02.2 (hereafter the Permanence Standard). MWE takes note of the immense and technically rich work undertaken by the Methodological Expert Panel (MEP) and recognizes the consultation process, which enabled parties and other stakeholders to share their inputs into the standard. Uganda is aware of the initial process in which we raised some concerns during the Call for Inputs, and further to this, Uganda being a Tropical Country places us in a difficult situation with dire consequences should you approve this Permanence Standard in its current form, and request that you stay the process for now, until it is well refined. Uganda recognizes that parties wish to expedite the implementation of Article 6.4, but we strongly believe that a REDD+ Country like Uganda would be alienated, yet we can make a contribution to the successful implementation of Article 6.4. We have provided some additional information in the next section to explain why we have reservations. Uganda and most likely other REDD+ and /or tropical forest Countries are confident that such additional time will enable the Supervisory Body to address the important concerns raised during the Call for Inputs in a meaningful manner. UNEP is confident that these concerns can be addressed while ensuring that the final text of the Permanence standard is aligned with the Removal Standard, safeguards environmental integrity, and strengthens confidence in the Article 6.4 Mechanism. This would not be a delay but rather an investment in the credibility, feasibility, and long-term success of the mechanism.			

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2	Appendix 1. 2. Definitions Paragraph (g) Negligible risk of reversal. Appendix 2. 3.2.2. Negligible risk of reversal		The requirements in the Permanence Standard exclude nature-based solutions from 6.4. Stakeholders' perceptions that the Permanence Standard has a sectoral bias do not appear to be groundless. Two things support that. The first is that the degree of uncertainty in probabilistic risk analysis makes it difficult, if not impossible, for nature-based solutions to meet the MEP's conditions for negligible reversal risk. Note that this is not to say that nature-based credits will not be standing in 100 years, but instead that the current state of science on modeling the stability of carbon stocks in the nature domain over 100 years comes with a level of uncertainty above that set by the MEP. The second contributor to excluding nature-based credits is the MEP's understanding that section 4.3 of the Removal Standard does not allow for limits to post-crediting monitoring (but see Uganda's view further below in this document). Together, these two conditions amount to asking countries and project developers that are willing to issue nature-based 6.4. credits to commit to potentially indefinite liabilities. This is a prospect that few, if any, market participants would be willing to accept. Equally important, the application of the conditions as presented above raises important equity considerations in the implementation of Article 6.4. For many countries, the AFOLU sector presents a significant mitigation and removal potential. Indigenous people and local communities have already demonstrated capacity to deliver high-integrity and cost-effective mitigation (IPCC, 2023; EGR2024). Their exclusion from 6.4 could significantly constrain their ability to achieve climate targets and further widen the existing global emissions gap.	A measured, gradual approach to long-term permanence. Uganda agrees that securing carbon storage over long-time frames is an essential component of achieving net-zero targets, but this must be approached gradually and pragmatically. More specifically, the calculation of the negligible risk of reversal can be performed with a time horizon shorter than 100 years and a confidence interval wider than 95%, while signaling the market that requirements may become more stringent as new tools and monitoring capacities become available. A gradual approach to achieving permanence would provide a workable entry point for both nature-based and technology-based solutions to climate change, while providing markets with clear signals that requirements will tighten over time. Uganda recommends that the Supervisory Body allow for additional time to perform scenario modelling and select an approach that retains gradualism while setting clear expectations for market participants.

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3	Cover Note 3.2. Summary of public comments not addressed in the recommendation by the MEP Paragraph 15 (b) and 15 (c) Cover Note 3.4. Appendix 1 (direction for mechanism methodologies) Paragraph 24		Compatibility with the Removal Standard. In calculating a negligible risk of reversal, the Removals Standard neither dictates a 100-year time horizon nor a particular % of carbon stock loss, nor a specific confidence interval. More specifically, paragraphs 26–28 of the Removals Standard do not explicitly require any of these conditions. On the contrary, they provide the Supervisory Body with flexibility to design balanced arrangements that combine ambition with pragmatism. The Permanence Standard, however, narrows this discretion. It explicitly treats the percentage threshold for defining “negligible risk of reversal” as a normative policy decision, while presenting the 100-year timeframe and the 95% confidence level as fixed technical requirements for demonstrating negligible risk. Uganda is not in agreement with this characterization. The selection of a 100-year horizon carries a normative dimension, setting temporal boundaries of relevance rather than representing an empirically determined standard. Regarding post-crediting monitoring, the Removals Standard does not mandate indefinite continuation. Paragraphs 26–28 provide that monitoring should extend beyond the last crediting period but may be terminated once a negligible risk of reversal is demonstrated or remediation is secured. While the MEP does not establish a fixed post-crediting duration, the Supervisory Body retains the discretion to determine an appropriate timeframe.	Uganda suggests that the Supervisory Body explore options for time horizons in the calculation of negligible risk and options for fixed post-crediting monitoring periods. This will enable the SBM to ensure that the Permanence Standard is aligned with the Removal Standard, while remaining technically robust and capable of being progressively strengthened over time without undermining environmental integrity. Uganda notes that exploring these options (benefiting from the built-in flexibility in the Removal Standard) is far more than a procedural matter. It is a pivotal opportunity to shape Article 6.4 as a robust, credible mechanism capable of delivering both high-integrity climate outcomes and broad, inclusive participation.

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4			Other reasons why Uganda is requesting for extension of the Standard Refinement Timeline: • Reference to the Call for Inputs and consideration of the inputs. In the Call for Inputs, Uganda and other countries expressed serious reservations with the framing of Appendices 1 and 2. The revised version of the Permanence Standard was unable to address these key concerns. Adopting of the Permanence Standard in its current form risks hardening entrenched positions and alienating us whose expertise and engagement are indispensable for the mechanism's credibility. Article 6.4 is, at its core, a multilateral process that depends on inclusivity, trust, compromise, and equity. Failure to respond to these legitimate concerns risks undermining confidence in a mechanism upon which global mitigation efforts critically depend. • Risk of Overshooting. Setting permanence requirements in A 6.4 that only a small subset of credits can meet will result in excluding credit categories that are indispensable to avoid triggering dangerous tipping points. Whether we manage to avert overshooting climate targets with catastrophic consequences will depend not so much on delivering a handful of credits with ultra-long permanence but instead on our capacity to rapidly scale up emission reductions and removals in the short term. • Flexibility for market integration. A gradual approach to permanence, as suggested above, would establish a credible floor rather than a ceiling, thereby preserving flexibility for 6.4 credits to participate in other compliance markets. Sovereign regimes such as the European Trading Scheme or CORSIA, among others, will always retain the prerogative to set their own eligibility criteria, if and when they accept 6.4 credits for trading, including longer permanence horizons if desired. This will facilitate cross-market compatibility without constraining ambition. • Integration with complementary instruments. The draft Permanence standard should not be assessed in isolation. Its effectiveness depends on parallel progress with the reversal risk assessment tool and at least an initial framework for remediation options. Developing these elements in a piecemeal manner risks unintended inconsistencies, inefficiencies, and loopholes. The additional time for consultation, as suggested in this letter, will be well invested if it also allows for the development of a comprehensive package that ensures permanence provisions are both robust and coherent. It is noteworthy that this aligns with inputs submitted by stakeholders on procedural matters, specifically the request to release the draft standards alongside the relevant instruments to enable a comprehensive assessment (e.g., the Risk Assessment Tool and the concept note addressing options for implementing paragraph 62 of the Removals Standard).	

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