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<i>Name of submitter</i>	Cédric de FOUCAULT
<i>Affiliated organization of submitter (if any)</i>	REWILDERS
<i>Email of submitter</i>	cedric@puretours.com
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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	General comment		The Supervisory Body should empower the Methodological Expert Panel (MEP) to design permanence rules adapted to the realities and impact of nature-based projects. Current provisions risk creating obligations that are not financeable or insurable, which would push land-based solutions out of Article 6.4 despite their urgent importance. The draft relies on an unrealistic binary view of permanence, while IPCC science shows CO₂ has multiple lifetimes . Even shorter-term removals make a real contribution, especially in the next decades where urgent action is needed. When carbon is sequestered in a tree it enter in a life cycle to witch we need to give a chance to last long. It has many consequences on the life of people. And nature including biodiversity. Many inputs and requirements including those from COP29, seem to have been overlooked. I believe that it is not normal that any of the most influential decisions for global carbon markets are being taken in technical meetings with very short consultation periods and only accessible to few. It limits the required transparency, yet they will shape the way countries and organisations meet their climate goals. Even more important it can weaken or kill plong term projects and solutions of resilience for communities and their lanscapes. Consultation with all types of stakeholders (including representant of rural indigenous communities of developping countries) seems very insufficient.	Very important to postpone adoption of this draft and mandate the MEP to develop a revised version that: • Aligns with IPCC guidance on permanence. • Integrates external expertise and representants of rural communities invloved in Nature based projects in the consultation. • Provides workable rules for nature-based removals. • Packages permanence rules with the risk tool and remedial actions for reversals.
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2	General comment on the MEP process		Transparency is insufficient. Stakeholders cannot engage meaningfully if MEP meetings are not fully visible.	Broadcast MEP meetings in full
3	Cover note, Section 3	Paragraph 15 (c)	We disagree that the Removals Standard requires perpetual post-crediting monitoring. Paragraphs 26 and 28 only require continuation after the crediting period and allow termination when risk is negligible. This could mean either a fixed or indefinite period.	Allow for a fixed monitoring period (e.g. 40 years after crediting ends) with the option of early termination if negligible risk is demonstrated.
4	Appendix 1, Section 2 Cover Note, Section 3, paragraph 24	Paragraph 3 (g)	The proposed “negligible risk” range of 0.5–2.5% is too strict and unworkable. Science on reversal risk is still evolving, and setting such a narrow range would make the negligible risk option unusable for most forest projects. Determining an exact percentage is not a scientific matter (there is no scientific consensus on reversal risk) but a policy choice. For this reason, the Supervisory Body should avoid locking in such restrictive numbers now. A more practical approach would be to allow a wider margin that can later be refined as the science progresses. This would make the “negligible risk” pathway both workable for projects and consistent with evolving evidence.	Allow MEP to study negligible risk more broadly with external experts and public input. A better definition would be: “Reversal risk that would lead to no more than [X]% of issued credits lost over [X] years after crediting.” Losses should be net of buffer/SoP/OMGE so that the focus is on real atmospheric impact.

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5	Cover Note, Section 3,	paragraph 24	The Reversal Risk Tool is supposed to be a full package (limits, ratings, categories, remediation). The MEP has only defined “negligible risk,” leaving the rest incomplete. Assessing one element in isolation should not be possible.	We ask the SBM to not adopt “negligible risk” rules now and to wait until the full Reversal Risk Tool is finalized.
6	Appendix 2. Section 1.3 Annual reversal report.	“1.3 Annual reversal report. 12. Activity participants shall submit to the secretariat, by 31 March each year, an annual reversal report that indicates whether, at any point in the previous calendar year, any observed events involving the release of stored greenhouse gases that could potentially have led to a reversal.”	Annual reversal reports would be too difficult to do and to costly, especially for projects in rural or low-capacity contexts. What would happen to these project if they don’t comply ? The Removals Standard does not mandate annual reporting, and requiring it adds cost and risk without improving integrity.	Change “Annual reversal report” to “Reversal report” and allow submissions every 1–5 years.

7	Appendix 2. Section 2.3 Missing report submissions	“35. Whenever a monitoring report or annual reversal report is designated as missing, the Article 6.4 activity shall be deemed to have experienced avoidable reversals. The secretariat shall provide electronic notice to the activity participant and inform the activity participant that it shall mitigate the avoidable reversals following the provisions of section 4 of this document. 36. The quantity of the avoidable reversals designated in paragraph 35 shall be deemed to be equal to the total number of A6.4ERs issued with respect to the Article 6.4 activity, cumulatively from the Article 6.4 activity’s start date through the date that the monitoring report or annual reversal report is designated as missing, inclusive of the number of A6.4ERs forwarded or first transferred, as applicable, to: (a) The activity participants; (b) The Reversal Risk Buffer Pool Account; (c) The mechanism registry account held by the Adaptation Fund; and (d) The mechanism registry account for cancellation towards	Treating any missing report as a full reversal seems very disproportionate. It punishes administrative delays as if they were carbon losses, which is especially harsh for smallholders and developing-country projects.	Adopt a system with warnings and grace periods. Distinguish between admin errors and real carbon loss.
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		delivering overall mitigation in global emissions. 37. Whenever a preliminary assessment report is designated as missing, the observed event in question will be deemed to have resulted in a reversal and a monitoring report submission shall be required pursuant to the terms of paragraph 10.”		
8	Cover Note, Section 5	Paragraph 57 (b)	There should be flexibility for post-crediting monitoring. Different models exist (buffer pools, insurance, cancellation at crediting end). Without the concept note on para. 62 options, how can we judge the implications?	Don't adopt the current draft and ask MEP to produce a workable package with adjustments to the Removals Standard, a risk tool, and remedial action note.
9	Appendix , Section 3	Paragraph 40	The Removals Standard does not require perpetual monitoring. Imposing it creates unsustainable obligations. Science shows CO ₂ decays along a curve, not infinitely.	Set a maximum monitoring period (e.g. 40 years) or until negligible risk is proven. Set a potential end date to liabilities.
10	Appendix 2, section 3.5.3. Post-crediting period monitoring and reporting	45	Indefinite monitoring makes projects unfinanceable, especially for smallholders and Global South projects. Portfolio-level risk management (insurance, funds, buffer pools) is a better solution.	Limit post-crediting monitoring to 20–30 years, or end earlier if risks are managed.

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11	Appendix 2, Section 3.5.7 Insurance coverage for reversals	54–55	Insurance is dismissed in the draft, whereas solutions already exist. Insurance can complement buffer pools and expand participation.	Ask MEP to: • Review existing insurance solutions. • Define criteria for approval. • Publish approvals in the registry. • Allow insurance to substitute or complement buffer pool contributions.
12	Appendix 1, Section 3 (Definitions)	3(g) – 'negligible risk of reversal'	Defining negligible risk over 100 years is unrealistic. It effectively excludes nature-based projects which is surely not aligned with IPCC recommendations to reach Paris Agreements objectives.	Revise to: “Negligible risk means a loss of no more than [X]% of issued credits over a realistic timeframe (20–30 years), unless risks are managed by portfolio-level instruments.”
13	Appendix 2, Section 4 (Post-reversal actions)	49	Current remediation relies only on buffer pool replenishment, which is too heavy a burden for smallholders.	Develop portfolio-level remediation tools (insurance, permanence funds) that can cover reversals, guarantee full cancellation of credits, and share risk fairly while maintaining integrity.

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