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Date of submission	23/09/2025

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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)
3	Cover note, section 3	Paragraph 20-22	Without amending the requirement for perpetual post-crediting monitoring, the MEP effectively excludes all Nature-based Solutions from participating in article 6.4. This not only means that Article 6.4 will not be project agnostic but also risks diverting financing from the very activities that are most scalable and most capable of large-scale carbon removal now.	Although we embrace a concept note on additional options to terminate post-crediting period monitoring obligations, we suggest that the MEP do away with perpetual post-crediting monitoring (the project must monitor, detect, and report reversals) all together and instead require a fixed period of 60 years if the crediting period is 40 years, in line with international standards.

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4	Appendix 1 & Appendix 2		We do not support Appendix 1 and 2 - the proposal that post-crediting period monitoring be carried on indefinitely among other requirements means that it will effectively be impossible to develop nature-based carbon removal projects for Article 6.4. In our reading, appendix 1 and 2 not only constitutes a bias towards engineered removals but also risks the achievement of the Paris Agreement goals. Nature-based removals are: • The only form of carbon removal widely available and scalable and thus crucial for meeting the goals of the Paris Agreement. • Crucial for combatting climate change more broadly, by restoring ecosystems that provide essential ecosystem services like temperature cooling, flood mitigation, soil health, water filtration and so forth. Investment into these important projects are put at grave risk, and we urge the Methodological Expert Panel to keep in mind the central reference point of the Paris Agreement: achieving the Long-Term Temperature Goal by 2100. To do this we will need rapid carbon removal. It can be added that: laws and rules that define open-ended, indefinite obligations confront legal concerns. Open-ended obligations lack legal precision, are difficult to enforce, result in disproportionate compliance costs and violate legal rules of legal certainty and proportionality.	

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5	Appendix 2, 3.1	Paragraph 40	Paragraph 40 requires activity participants to continue post-crediting monitoring indefinitely. We are strongly against this rule because: • It ignores the timeline of the Paris Agreement, for which Article 6 was designed to help achieve. The reference year of the Paris Agreement is 2100. This should be the timeline we work on. • Although it does provide options for the termination of this indefinite monitoring, it is almost impossible for Nature-based project to be economically viable and meet these conditions. This means it is effectively impossible for Nature-based removal projects to be eligible under 6.4, while they remain the most widely scalable form of carbon removal in a climate crisis that will require a rapid scale-up of carbon removal.	We suggest the MEP require a fixed period of 60 years post-credit period monitoring (the project must monitor, detect, and report reversals), if the crediting period is 40 years, in line with international standard.

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