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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	Section No. 3.5.7	The MEP notes that paragraph 59 of the Removals Standard provides that activity participants should obtain and maintain sufficient coverage under an insurance policy or comparable guarantee products to cover the risk that avoidable reversals occur. The MEP was unable to identify any comparable types of insurance products. Accordingly, the MEP has not included a requirement that activity participants obtain insurance or other comparable guarantee products to cover activity participants' avoidable reversal risks	To note that insurance solutions are DE FACTO available for projects in the nature-based category to de-risk against non-permanence. Those include products Howden has supported to develop with Gold Standard and CORSIA https://www.howdengroup.com/uk-en/climate-risk-and-resilience/CORSIA	"Remove sentence on ""The MEP was unable to identify any comparable types of insurance products and that accordingly not included a requirement for insurance"

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2	Section No. 3.1.b	This document includes a narrower range of views, from 0.5 per cent to 2.5 per cent over a 100-year period and recommends that the Supervisory Body select a value from within this range. This provision is implemented in paragraph 3(g) of Appendix 1;	To require 100 year timeframe plus narrowing the negligible threshold further, risks excluding nature from the system altogether. While this signals the need to address the risk that reversals may take place after the project's lifespan, it is an extreme and impractical measure that would divert urgently needed climate finance away from land use solutions Efficient approaches already exist and could be developed in the future — such as buffer pools that absorb the impact of unintentional reversals, insurance mechanisms that transfer financial risk and trust funds that can provide long-term resources for monitoring and remediation	participants may request to terminate their obligations to conduct post-crediting period monitoring IF they can proof statement of insurance where risk is transferred into trust funds
3	Section 3.	The post-crediting monitoring period shall start on the first day after the end of the last active crediting period. The post-crediting monitoring period shall continue indefinitely or until one of the conditions in section 3.2 below is satisfied.	INDEFINITELY? That's why credit buffers, insurance products etc. exist... See my comment above re: 3.5.7	Remove indefinitely and revise the rules that would enable projects to request being freed from monitoring obligations in the post-crediting period
4				
5				

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