

**A6.4-SB004-A02**

Information note

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Guidance and questions for further work on  
removals

Version 01.0



## Guidance and questions for further work to prepare the updated information note on removal activities under the Article 6.4 mechanism

### Items included / excluded and “key”

- (a) Background or notes on status of discussions or key feedback in “*{italics}*”
  - (b) Where SB signaled or considered need **for further guidance, requirements, tools**
  - (c) *Includes* elements, choices from SB03 recommendations; SB02 Annex (where indicated)
  - (d) *Excludes* elements (1) shifted to meths work; (2) options discussed, deleted at SB02/03
1. **Introduction** {Summarized mandate; Process, progress from COP27 – present; Acknowledgement of any key outstanding elements and work beyond COP28}
  2. **Definitions** {*Defined “removals” “for purpose of this guidance. At COP27, members chose to define terms by their function in substantive guidance; the literature-derived definition of removals could be misunderstood as indicating the eligibility of specific categories, e.g., processes, ocean reservoirs*}
    - (a) Single definition—of “removals”
      - (i) as processes *and* outcomes {*current draft*}
      - (ii) removals as outcomes {*only*}
      - (iii) with/out examples of storage {*current draft employs examples*}
    - (b) Additional definitions needed?
    - (c) No definition
  3. **Requirements** {chapeau refers to all applicable rulesets, RMPs, further relevant decisions}
    - (a) Monitoring**
      - (i) Quantification and estimation and their basis
      - (ii) Statement of uncertainties and limits of methodologies
      - (iii) Exceeding uncertainty limit requires **adjustment in a conservative manner**
      - (iv) Flexibility in monitoring via conservative default values
      - (v) Monitoring after end of crediting period per provisions
    - (b) Reporting**
      - (i) Report preparation summarizing results of monitoring reversals
      - (ii) Monitoring report contents {*inter alia: Sub-list from paragraph 3.2.12*}

- a. Operations, methods, results
  - b. Data sets and summary data exceptions
  - c. Records and logs, including potential reversal events and notifications
  - d. Estimates of occurred reversal(s)
  - e. How reversal(s) addressed
  - f. How environmental, social impacts assessed & safeguards applied, per provisions
  - g. How SD fostered, per provisions
- (iii) Simplified monitoring for non-verification events per provisions
- (iv) Maximum timeframes TBD by 6.4SB  
*Specified for, e.g.:*
- a. initial monitoring
  - b. subsequent monitoring
  - c. report submissions
  - d. if event observed that could potentially lead to a reversal {"may also be required"}
- Specified timeframe(s):*
- e. Maximum timeframe = X year(s)
  - f. Minimum timeframe = X time(s) within each crediting period
- (c) Accounting for removals**
- (i) Credited removals exceed baseline while deducting for emissions and leakage
  - (ii) Exclusion of pools if results in more conservative calculation of net removals
  - (iii) Activities also involving reductions: Guidance applied via methodology(ies) per provisions
- (d) **Crediting period**—Apply latest applicable version of methodology(ies)
- (e) **Reversals**—Minimize risk over multiple NDC periods and address in full per provisions
- (f) **Leakage Avoidance**—Minimize leakage and adjust for any remaining per provisions
- (g) **Avoidance of other negative environmental, social impacts** {At COP27, stakeholders questioned, e.g., optional nature of impact avoidance, key elements missing from possible impacts list, national prerogative caveat and its basis}
- (i) Minimize and, where possible, avoid per provisions

*including possible impacts on...*

- a. biodiversity
- b. land and soils
- c. ecosystem health
- d. human health
- e. food security
- f. local livelihoods
- g. the rights of the indigenous peoples

(ii) while acknowledging that enforcement of E&S protection laws is a national prerogative

4. **Additional requirements** *{may be activity-type specific}*

(a) Accounting for permanence *{Some contents in this category in SB02 draft Annex may be relevant to all removal activities; if agreed, move to general rules as relevant}*

(i) Permanence period

- a. Duration: [ $<40$ ] [40] [50] [60] [100] [ $>100$ ] years
- b. General period applies to all removals activities *{move to general rules}*
- c. Activity type-specific durations *{remains in this section}*

(ii) Accounting and crediting approach

Credits issued for removals achieved and verified since the previous verification per general guidance for accounting for removals...

- a. And discounting for crediting period shorter than permanence period
- b. No discounting

(b) Measures to address reversals

(i) Permanence buffer

a. Allocation of buffer credits: based on...

- i. Activity risk rating *{if yes: procedures, template for up-front risk assessment; whether ex ante rating is fixed or periodically re-assessed + updated; whether rate calculation takes account of permanence period discount—option above}*
- ii. Default rate applicable to all activities *{if yes: determine default %}*

b. Buffer design

- i. Activity-specific buffer
      - ii. Buffer pools contributions from all removals activities
      - iii. Option to (instead/also) purchase, contribute credits from other activities
    - c. Reversal compensation and buffer management procedures
      - i. For intentional vs unintentional reversals
      - ii. If activity's buffer cancellations exceed contributions
      - iii. For replenishment
      - iv. For un-tapped buffer credits *{Return to proponent? Cancel?}*
    - (ii) Commercial insurance *{standalone option or to complement buffer; if yes, needs procedures for insurers: standard for + accreditation by SB, and for guarantee statements}*
    - (iii) Direct replacement guarantee *{standalone option or to complement buffer; if yes, needs procedures for guarantor: standard for + accreditation by SB, and for guarantee statements}*
    - (iv) None—covered by issuance deductions based on permanence and crediting period *{extended application of accounting and crediting discount option, above}*
5. **Land-based activities** *{Draft Annex contents were comparably less refined. Only high-level categories are identified—for further discussion}*
- (a) Host Party responsibilities**
- (i) Activities implemented in jurisdictional context *{covered in meth requirements?}*
    - a. Purpose and coverage of jurisdictional monitoring
    - b. Baseline-setting in relation to jurisdictional strategy / reference level(s)
    - c. Avoiding “doubles” (at higher and lower implementation levels)
  - (ii) Relationship with the requirements under Article 5 of the Paris Agreement
6. **Geologic storage activities** *{Draft Annex contents were comparably less refined. Only high-level categories are identified—for further discussion}*
- (a) Definitions** *{e.g., geologic storage site, operational phase, closure phase}*
- (b) Preparation and site selection**
- (i) Data and information collection, compilation and evaluation *{In draft Annex, “Step 1”}*
    - a. With storage-type specific guidance *{draft Annex included type-specific sub-guidance}*

- b. No type-specific guidance
  - (ii) Site modeling and risk assessment *{In draft Annex, various contents}*
    - a. Architecture and properties: site and surrounding domains
    - b. Site behavior and integrity
    - c. Risk assessment: Site safety
    - d. Risk assessment: Site integrity and seepage
  - (iii) Site development / management plans
    - a. Including site risk remediation plans *{if distinct from general safeguards procedures}*
- (c) **Monitoring** *{Draft Annex contained wide range of type-specific monitoring procedures}*
- (d) **Host Party responsibilities** *{Draft Annex contained wide range of type-specific assessment and remediation procedures}*

## Appendix 1. Key questions drawn from removals recommendations

### 1. Categories of removals activities

1. Do we develop distinct guidance for activity categories where appropriate?
2. Are these the sub-categories?
  - (a) Land-based
  - (b) “Engineering -based” (info note) OR “geological storage” (SB02 draft Annex)

### 2. Definitions

3. What is the purpose of defining “removals” for this guidance?
  - (a) General information, so starting from definitions in scientific literature?
  - (b) Describing the subject of this guidance, i.e., more narrow than SB03 version?
4. Should we retain references to removals being processes *and* outcomes {*SB03 version*}
  - (a) Or refer to removals as outcomes {*only*}
5. Should we retain examples of storage {*current draft employs examples*}
6. Are additional definitions needed?

### 3. Permanence

7. Permanence period length; its relationship to crediting period, if any?
8. Choice of permanence measure(s); relationship to accounting approach, if any?
  - (a) Which measure? Should any measures be combined?
  - (b) Different approaches to intentional vs. unintentional reversals?
  - (c) Interlinkages to other elements of guidance (for risk assessment, MRV)?
9. Type-specific or general risk (speaks to placement, focus of guidance)?

### 4. Environmental and social safeguards

10. How to address concerns raised at COP27
11. Need *specific* procedures (for risk assessment, mitigation measures, monitoring, reporting)?
  - (a) Specific to removals activities?
  - (b) Specific to categories of removals activities?

## 5. Monitoring and Reporting

12. What are the specified maximum timeframes for monitoring, reporting?
13. Procedures for monitoring after end of final crediting period—
  - (a) How long? In what instances?
  - (b) Are there other design choices that could render this unnecessary?
  - (c) How do we know that assumptions, calculations, choices are “conservative”?

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### Document information

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#### Related documents:

28 February 2023	<a href="#">A6.4-SB004-AA-A04</a> - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 3.0)
07 November 2022	<a href="#">A6.4-SB003-A03</a> - <i>Recommendation</i> : Activities involving removals under the Article 6.4 mechanism (version 1.0)
25 October 2022	<a href="#">A6.4-SB003-AA-A03</a> - <i>Draft recommendation</i> : Removal activities under the Article 6.4 mechanism (version 2.0) <a href="#">A6.4-SB003-AA-A04</a> - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 2.0)
15 September 2022	<a href="#">A6.4-SB002-AA-A05</a> - <i>Draft recommendation</i> : Requirements for the development and assessment of mechanism methodologies pertaining to activities involving removals (version 1.0) <a href="#">A6.4-SB002-AA-A06</a> - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 1.0)
08 July 2022	<a href="#">A6.4-SB001-AA-A05</a> - <i>Concept note</i> : Removal activities under the Article 6.4 Mechanism (version 1.0)