

A6.4-SB008-A14

Draft Recommendation

Activities involving removals under the Article 6.4 mechanism

DRAFT

Version 04.1



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1. Procedural background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), by its decision 3/CMA.3 “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement”, paragraph 6(c), requested the Supervisory Body of the mechanism established by Article 6, paragraph 4, of the Paris Agreement (Article 6.4 mechanism) to elaborate and further develop, on the basis of the rules, modalities and procedures of the Article 6.4 mechanism (RMP), recommendations on activities involving removals, including appropriate monitoring, reporting, accounting for removals and crediting periods, addressing reversals, avoidance of leakage, and avoidance of other negative environmental and social impacts, in addition to the activities referred to in chapter V of the RMP (Article 6, paragraph 4, activity cycle), to be considered at its fourth session (November 2022).¹
2. In response to this request, the Supervisory Body agreed on the recommendations on activities involving removals under the Article 6.4 mechanism contained in the annex to the addendum of its annual report to the CMA at its fourth session².
3. The CMA, by its decision 7/CMA.4, paragraphs 19 and 20, invited Parties and admitted observer organizations to submit, via the submission portal, by 15 March 2023, their views on activities involving removals and requested the Supervisory Body to consider the views of Parties and observers in elaborating and further developing recommendations on activities involving removals, while taking into account the mandate provided to the Supervisory Body contained in paragraph 24(a)(ix) of the RMP, and considering broader inputs from stakeholders provided in a structured public consultation process.
4. This document is prepared for the consideration of the Supervisory Body with a view to facilitate its work to make a recommendation to the CMA, in response to the CMA mandate mentioned in paragraph 3 above.

2. Context of removals under this guidance

2.1 Context

5. Relevant extracts from the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) Working Group III (WGIII) definitions of activities involving removals include the following:
 - (a) Anthropogenic removals as the withdrawal of greenhouse gases (GHGs) from the atmosphere as a result of deliberate human activities. (IPCC AR6 WGIII report glossary);
 - (b) Carbon dioxide removal (CO₂; CDR) as anthropogenic activities removing CO₂ from the atmosphere and durably storing it in geological, terrestrial, or ocean reservoirs, or in products. It includes existing and potential anthropogenic enhancement of biological, geochemical or chemical CO₂ sinks, but excludes natural CO₂ uptake not directly caused by human activities. (IPCC AR-6 WG III technical summary).

¹ Document FCCC/PA/CMA/2021/10/Add.1 available at: <https://unfccc.int/documents/460950>.

² Document FCCC/PA/CMA/2022/6/Add.1 available at: <https://unfccc.int/event/cma-4?item=14>.

2.2 Definitions

6. For the purposes of this guidance,
 - (a) **Removals** are the outcomes of processes to remove greenhouse gases from the atmosphere through anthropogenic activities and destroy³ or durably store them.
 - (b) **Activities involving removals** meet the requirements referred to in Paragraph 7. Any examples in this guidance referring to specific activity types or categories are purely illustrative and do not give effect to decisions by the Supervisory Body regarding their use under the Article 6.4 mechanism unless explicitly indicated as such.

3. Requirements

7. Activities involving removals under the Article 6.4 mechanism shall meet the requirements contained in sections below and in any further requirements developed and approved by the Supervisory Body for activities involving removals, in addition to the requirements contained in the RMP and any further relevant decisions of the CMA, and all relevant Article 6.4 mechanism standards and procedures.

3.1. Monitoring

8. Activity participants shall monitor removals through an appropriate application of quantification and estimation based on field measurements, remote sensing, measurement through instrumentation, or modelling, in combination as necessary. In this regard, methodologies shall contain provisions that specify the monitoring approach(es) for all parameters needed for the calculation of removals according to the types of removal activities.
9. Methodologies shall contain provisions that ensure that the approaches related to the use of measurements, sampling, data from third parties, published literature, satellite data, default values or modelled data, are robust, statistically representative, and conservative, and appropriately address uncertainty.
10. Methodologies may contain provisions that specify monitoring by a third party, where activity participants are responsible for providing the information/data as requested by the third party and for receiving the necessary information required for the monitoring reports from the third party.
11. Methodologies shall contain provisions that require the calculation of removals and associated uncertainties. The uncertainties shall be within the limits specified in the methodologies applied. If the uncertainty of estimated removals exceeds the specified limits, the calculated values shall be adjusted in a conservative manner as specified in the methodologies.
12. Calculation of removals may employ conservative default values that appropriately address uncertainty, to allow flexibility in monitoring.
13. Methodologies may include provisions for the use of higher tier methods such as the use of measured values in lieu of conservative default values in the instance that the default values are demonstrated to underestimate an activity's net removals.

³ Does not refer to activities engaging in point-source capture and destruction of GHGs that are credited for emissions reductions based on measured volumes.

14. Methodologies contain provisions that require appropriate quality assurance and quality control measures, such as cross-checking the monitoring results with other sources of data and published literature, or calibration of measuring equipment at regular intervals.
15. Monitoring plans shall include monitoring of measures to mitigate risks identified in the reversal risk assessment tool and Article 6.4 **Mechanism** Sustainable Development Tool.
16. Methodologies shall contain provisions that require activity participants to submit a monitoring plan at the registration of the activity. Monitoring plan shall be reviewed and updated at the start of each crediting period, as well as in any of the following circumstances:
 - (a) When verification reveals a need for a revision of the monitoring plan;
 - (b) Following any significant reversal event that reveals a risk factor that is not already included, or may be underestimated, in the monitoring plan and corresponding risk assessment;
 - (c) As per existing and applicable national and regional regulations as specified by the host Party.
17. Monitoring shall also be conducted after the end of the last active crediting period of the activity for a period of time that takes into account the activity's residual reversal risk based on the reversal risk assessment. Activity participants shall indicate the arrangements to monitor, report, and remediate any reversals during post crediting period in the project design document.
18. The transfer of responsibility to monitor, report, and remediate any reversals, during the post crediting period, to an appropriate domestic arrangement may be eligible under instances where the host Party has explicitly and voluntarily approved the transfer of responsibility from the activity Participant to the host Party.
19. The Supervisory Body will develop further guidance in this regard including timeframes for the post-crediting period monitoring phases and requirements for monitoring, where applicable, the conditions for implementing simplified monitoring and transfer of responsibility indicated in paragraph 18 as well as possibility of transfer to a third party. Such guidance shall also include requirements for the activity participants to provide evidence to conclude monitoring for the consideration and approval of the Supervisory Body which shall include a demonstration that the removals will be stored with minimal risk of reversal or that potential future reversals of removals for which 6.4ERs have been issued has been remediated as though a reversal has occurred according section 3.5.3 **Addressing reversal risk and reversals** of this this guidance.

3.2. Reporting

20. Activity participants shall prepare monitoring reports after implementing monitoring operations and methods as specified in monitoring plans, including for seeking issuance of credits.
21. Monitoring reports shall contain:
 - (a) An outline of the monitoring plan with a description of the monitoring operations and methods used to implement the plan, and the resulting calculated removals during the monitoring period along with the associated uncertainties in the calculation;

- (b) Field data collected, including remotely sensed data, or if the data set is too voluminous, a summary of the data and an indication of how the complete data set may be accessed;
 - (c) Records and logs of observed events that could potentially lead to the reversal of removals as well as a summary of any reversal notifications that were submitted during the monitoring period;
 - (d) Estimates of any reversals that occurred during each monitoring period, including descriptive information on how reversals occurred, whether they were avoidable or unavoidable, and remedial actions taken;
 - (e) Information on how the environmental and social impacts were assessed and addressed by applying robust environmental and social safeguards as per Section 3.7 **Avoidance of other negative environmental and social impacts**, as well as how the activity is fostering sustainable development through the utilization of the Article 6.4 sustainable development tool.
 - (f) Information on how reversal risks were assessed and addressed consistent with risk mitigation measures described in the reversal risk assessment tool.
22. Monitoring reports shall be prepared without a gap between the two successive monitoring periods.
23. Methodologies shall contain provisions to specify the minimum frequency of monitoring report submission, which shall be commensurate with the degree and nature of the risk of reversals determined through a risk assessment undertaken by the activity participants as per 3.5.1. Reversal risk assessment. Based on the results of the risk assessment referred to above, the frequency may range from one to five years from the submission date of the first monitoring report. Activity participants may choose a shorter period for monitoring than the specified minimum frequency. A reversal event may also trigger the preparation of a monitoring report as described in 3.5.2 Post reversal actions.
24. Methodologies shall contain provisions to specify the maximum duration allowed to submit the first monitoring report from the start date of the first crediting period. Based on the results of the risk assessment referred to in section 3.5.1. Reversal risk assessment, the duration may range from one to five years from the start date of the first crediting period. Methodologies shall contain provisions to require submission of subsequent monitoring reports at least every two years for activities with high reversal risk or at least every five years for those with low reversal risk.
25. The Supervisory Body will develop guidance on options for responding to late, incomplete, or missing monitoring report submissions or where monitoring is completely stopped.

3.3. Accounting for removals

26. Removals to be credited shall be those in excess of the baseline while deducting any leakage emissions and emissions within the activity boundary that result from the implementation of the activity and do not constitute a reversal (i.e., “net removals”). In respect of each year in a given monitoring report, removals to be credited shall be calculated by comparing the current cumulative net removals to the same measure in the previous reported year, to determine the following:
- (a) Creditable removals: Quantity of current cumulative net removals that exceed the previous year’s cumulative net removals.

- (b) Reversals: Quantity of current cumulative net removals that fall below the previous year's cumulative net removals.

27. Any carbon pools and greenhouse gases may be optionally excluded from accounting, if such exclusion results in a more conservative calculation of net removals, which shall be demonstrated in the PDD.

28. If an activity involving removals also results in emission reductions, relevant guidance shall be applied through a relevant methodology or a combination of methodologies applicable to the activity in accordance with the provisions to be developed by the Supervisory Body.

3.4. Methodologies applicable for the crediting period

29. At the renewal of the crediting period, activities involving removals shall apply the latest version of the applicable methodology.

3.5. Addressing reversals

30. Activity participants shall minimize the risk of the release of stored removals and, where such reversals of removals occur, ensure that these are addressed in full, in accordance with guidance in this document.

3.5.1. Reversal risk assessment

31. The risks of reversals may be avoidable or unavoidable and may include, inter alia:

- (a) Internal risks such as those related to activity finances and management;
- (b) External risks such as those related to asset ownership, rising opportunity costs, regulatory and social instability, country-specific political risks and legal risks;
- (c) Natural risks such as those related to fires, pests, and droughts.

~~32.~~ Activity participants shall conduct a risk assessment at the activity level using robust methods to identify and assess the reversal risks, including to quantify and score them, for instance the nature, scale, likelihood, and duration of the risks and of potential reversals. The percent-based reversal risk rating resulting from this assessment shall inform, among other procedures, an activity's application of remediation measures referred to in 3.5.3 **Addressing reversal risk and reversals**.

33. Activity participants shall also develop and describe plans to mitigate and monitor the risks and steps taken. Risks that cannot be eliminated shall be addressed as described below in this document.

34. Activity participants shall review and revise the risk assessment every five years from the start of the first crediting period, as well as in any of the circumstances specified in paragraph 1645 (a)–(c).

35. The Supervisory Body will develop a reversal risk assessment tool. Methodologies may include additional guidance on the application of the tool.

3.5.2. Post reversal actions

3.5.2.1. Reversal notification and related actions

36. The activity participant shall notify the Supervisory Body of reversals that occurs within their project boundary. The submission of a reversal notification shall be made as follows:

- (a) A preliminary notification shall be provided, within **30** days of the observed event that could potentially lead to the reversal, including, at a minimum, the date, the location and a short description of the event. It may be provided digitally;
 - (b) Activity participants wishing to demonstrate that removals for which 6.4ERs have been issued were not disturbed by the observed event prior to submitting a full monitoring report shall submit a verified monitoring report of the information referred to in paragraphs **24 21** (a)-(c) above, which may be provided digitally.
 - (c) A reversal notification as a full monitoring report referred to in paragraph **24 21** above shall be provided within 360 days of the observed event, which includes, *inter alia*, estimates of the reversals that occurred and information on how the reversals occurred, whether they were avoidable or unavoidable, and whether they were or will be addressed including through corrective actions referred to in an accompanying updated reversal risk assessment;
 - (d) In case the reversal event is still ongoing such that a delayed submission of the full monitoring report would result in more complete and accurate information, the activity participant may submit a verified monitoring report referred to in paragraph **39 36 (b)** above to request the Supervisory Body to extend deadline for submission of the full monitoring report by 90-180 days from the original submission deadline;
- 37.** Upon submitting a preliminary notification as per paragraph 36(a) above, activity participants will be unable to issue, transfer, or cancel ERs until the activity participant submits a verified monitoring report or a full monitoring report demonstrating that removals for which 6.4ERs have been issued were not disturbed by the observed event, or until the 6.4 registry administrator confirms that the reversal has been remediated as per **3.5.3 Addressing reversal risk and reversals.**
- 38.** Following the submission of a full monitoring report that reflects reversals, the Supervisory Body will review the report to confirm, among other things, that the activity proponents have accurately characterized the reversal event as being avoidable or unavoidable. The Activity Participants will be notified of the Supervisory Body's determination within a timeframe to be specified by the Supervisory Body.
- 39.** The Supervisory Body will develop further guidance in regard to the measures in this section, including the format and procedures for notifications and reports that may be submitted digitally.

3.5.2.2. Corrective actions

- 40.** Following the submission of the preliminary notification referred to in paragraph **36 39(a)**, activity participants shall undertake appropriate corrective measures and demonstrate this in requisite updates to the reversal risk assessment accompanying the full monitoring report submitted for reversal notification purposes, *inter alia*:
- (a) Assessing how the reversal occurred and its causes;
 - (b) Elaborating plans to prevent further reversals such as improving control measures, storage conditions and handling procedures, and arranging further personnel training in various aspects of removal process;
 - (c) Reassessing adherence to applicable local and international regulations;
 - (d) Engaging stakeholders in accordance with the procedures of the Supervisory Body.

3.5.2.3. Preventive actions

41. Activity participants shall update and submit the reversal risk assessment as per section 3.5.1. **Reversal risk assessment**
42. Activity participants shall also update the assessment conducted using Article 6.4 mechanism sustainable development tool to reflect the relevant underlying causes and any negative impacts, as well as plans for remediation and prevention of a recurrence, and submit this with the updated reversal risk assessment accompanying the full monitoring report submitted for reversal notification purposes.

3.5.2.4 Activity continuation post-reversal

43. Subject to conditions under the section **3.5.2.1** Reversal notification and related actions, activity participants shall continue to implement an activity and utilize the 6.4 Registry to issue, transfer, and/or cancel 6.4ERs provided the total estimated removals within the activity boundary exceed the baseline level and the reversal has been remediated as per 3.5.3 **Addressing reversal risk and reversals**.
44. The Supervisory Body will develop further guidance on the treatment of activities for which a reversal results in total estimated removals within the activity boundary that fall below the baseline level.

3.5.3. Addressing reversal risk and reversals

45. Activity participants shall insure against and fully remediate reversals of removals for which 6.4 ERs have been issued by taking measures described in this section. The measures are intended to effectively address reversals and maintain incentives for activity participants to proactively mitigate reversal risks and avoid reversals.
46. Reversals shall be remediated through the cancellation of an equivalent amount of 6.4 ERs. Measures for effecting this cancellation include the use of the Reversal Risk Buffer Pool and/or the use of 6.4 ERs from other 6.4 activities for this purpose. These measures may be used on a standalone basis or in combination, which shall be informed by the results of the risk assessment specified under 3.5.1 Reversal risk assessment and the demonstration that a reversal is avoidable or unavoidable.

3.5.3.1 Buffer pool operations and contributions

47. The Article 6.4 Supervisory Body shall establish a Reversal Risk Buffer Pool which serves to insure against the general risk of, and to remediate, unavoidable reversals under the 6.4 mechanism. Activity participants applying guidance for activities involving removals shall contribute 6.4 ERs to the Reversal Risk Buffer Pool, which are cancelled in the event of an unavoidable reversal.
48. Upon issuance of 6.4ERs, an amount of 6.4ERs proportionate to the issuing activity's reversal risk rating shall be forwarded to the Reversal Risk Buffer Pool, which is a holding account that aggregates all contributions of Buffer 6.4 ERs. The Reversal Risk Buffer Pool account is overseen by the Supervisory Body and is administered and shall only be accessed by the Article 6.4 mechanism registry administrator.
49. Following the Supervisory Body's review of a full monitoring report that reflects reversals, the Supervisory Body will notify the registry administrator of the results of its review, after which the registry administrator shall effect a cancellation of Buffer 6.4 ERs equal to the

amount of unavoidable reversals requiring remediation. Where possible, reversals should be remediated with 6.4 ERs from the same vintages.

50. Buffer ERs shall not be cancelled to remediate avoidable reversals.
51. The Supervisory Body shall oversee a periodic stress-test of the reversal risk buffer pool at least every three years to assess, inter alia, the pool's resilience for a range of plausible reversal risk scenarios affecting the activities linked to the buffer pool. In addition to regular stress-testing, the composition of the buffer pool, including the share of credits by vintage, region and country, activity type, crediting methodology, and specific activity, should be published annually.
52. The Supervisory Body will develop further procedures for the Buffer's use and operation , inter alia:
 - (a) Definition and treatment of unavoidable versus avoidable reversals;
 - (b) Treatment of uncanceled / unused 6.4 ERs;
 - (c) Buffer composition, cancellation procedures, and security;
 - (d) Measures to address buffer insufficiency.
 - (e) Notifications from third parties to Supervisory Body of observed events that could potentially lead to reversals

3.5.3.1.1. Insuring direct credit cancellation

53. Activities with a negligible risk of reversals as demonstrated in the reversal risk assessment may qualify to insure against the risk of reversals by obtaining and continually maintaining sufficient coverage under an insurance policy or comparable guarantee product approved by the Supervisory Body, rather than by contributing Buffer ERs to the Reversal Risk Buffer Pool. In such cases, activity participants shall remediate reversals by cancelling for this purpose an amount of 6.4 ERs from another 6.4 activity equal to the amount of avoidable or unavoidable reversals requiring remediation.
54. Activity Participants utilizing the Reversal Risk Buffer Pool shall also apply the measures for 6.4ER cancellation referred to in paragraph 53 to remediate avoidable reversals.
55. Following the Supervisory Body's review of a full monitoring report that reflects reversals, the Supervisory Body will notify the registry administrator of the results of its review. No more than 30 days following this communication, the 6.4 mechanism registry administrator will confirm with the activity participants that the necessary direct cancellations of 6.4ERs from other 6.4 mechanism activities have been undertaken.
56. The Supervisory Body will develop further guidance in regard to the measures in this section, including their applicability and use.

3.5.3.2. Host Party measures for reversal remediation

57. In circumstances where a host Party voluntarily ~~authorizes~~ **approves** the transfer of responsibility from the activity participant to the host Party, the host Party may apply the reversal remediation measures identified by the activity participant based on the requirements in this document or, alternatively, provide a sovereign guarantee to apply corresponding adjustments in respect of the reversal amount consistent with Article 6.2 guidance and further guidance to be developed by the Supervisory Body in this regard.

3.5.3.2.1. Avoidable versus unavoidable reversals

58. The Supervisory Body will develop further guidance on avoidable and unavoidable reversals, including how they are distinguished and demonstrated.

3.5.3.2.2. Treatment of uncancelled Buffer ERs

59. The Supervisory Body will develop further guidance on the treatment of uncancelled Buffer ERs, including their disposition, cancellation, and considerations for reversal risk assessment rating levels and buffer sufficiency and replenishment.

3.6. Avoidance of leakage

60. Activity participants shall address the risk of leakage and account for any remaining leakage in calculations of net removals in accordance with the requirements specified in the “Requirements for the development and assessment of mechanism methodologies”, including by applying the tool to be developed by the Supervisory Body for this purpose. Methodologies and related tools may include additional requirements applicable to specific types or categories of removal activities.

3.7. Avoidance of other negative environmental and social impacts

61. Activity participants shall apply robust social and environmental safeguards to minimize and, where possible, avoid negative environmental and social impacts of the activity:
- (a) In accordance with requirements contained in Article 6.4 mechanism activity standard⁴, including the application of the Article 6.4 mechanism sustainable development tool⁵, guidance on local and global stakeholder consultation and where applicable, the Appeals and Grievance Procedure⁶; and
 - (b) Any other applicable provisions developed by the Supervisory Body to avoid negative environmental and social impacts of an activity involving removals.
62. In addition to above requirements, the Supervisory Body will develop further requirements in respect of specific removal activity categories or types taking into account national and international best practices in environmental and social safeguards, which activity participants shall also apply.

3.8. Host Party roles

63. A host Party may specify to the Supervisory Body, prior to participation in the mechanism or, at the latest, at the time of providing to the Supervisory Body an approval of an activity

⁴ ~~A6.4-SB008-AA-A07 - Draft standard:~~ A6.4-SB008-A04 Standard: Article 6.4 mechanism activity standard for projects.

⁵ ~~A6.4-SB008-AA-A10~~ A6.4-SB008-A10- Draft Tool: Article 6.4 sustainable development tool.

⁶ ~~A6.4-SB008-AA-A05~~ A6.4-SB008-A09 - Draft Procedure: Appeal and grievance processes under the Article 6.4. mechanism.

involving removals, and subject to the RMP and guidance in this document and under the supervision of the Supervisory Body:

- (a) Existing and applicable national and regional regulations specifying the frequency, timing, and/or basis for updating and submitting an updated monitoring plan;
- (b) Any specifications and arrangements voluntarily provided by the host Party for the voluntary ~~authorisation~~ approval of the transfer of responsibility from the activity participant to the Host Party to monitor removals attributed to the activity and remediate reversals of removals for which 6.4ERs were issued by taking measures as specified in this guidance if applicable, or comparable guarantees.

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
04.1	7 November 2023	Editorial revisions to include the addition of coloured highlights and corrections to cross-references within the document.
04.0	2 November 2023	Published as an annex to the meeting report of SB 008. This version is a work-in-progress and will be used to make further improvements based on guidance provided by the Supervisory Body at SB 009.
03.0	19 October 2023	Published as a late annex to the annotated agenda of SB 008. This version takes into account guidance from the Supervisory Body at SB 007 (SB 007 meeting report, paras. 26-29).
02.0	14 September 2023	Published as an annex to the meeting report of SB 007. This version is a work-in-progress and will be used to make further improvements based on guidance provided by the Supervisory Body at SB 007.
01.0	1 September 2023	Published as a late annex to the annotated agenda of SB 007.

Decision Class: Regulatory

Document Type: Recommendation

Business Function: Methodology

Keywords: A6.4 mechanism, emission removal activities, methodologies, recommendation to CMA

Related documents:

14 September 2023	A6.4-SB007-A07 - Draft Recommendation: Activities involving removals under the Article 6.4 mechanism (v.02.0)
1 September 2023	A6.4-SB007-AA-A15 - Draft recommendation: Activities involving removals under the Article 6.4 mechanism (v.01.0)
28 August 2023	A6.4-SB007-AA-A14 - Information note: Draft elements for the recommendation on activities involving removals (v.02.0)
28 August 2023	A6.4-SB007-AA-A13 - Information note: Compilation of the public inputs on removal activities under the Article 6.4 mechanism (version 02.0)
18 July 2023	Questions for structured call for inputs on recommendations for activities involving removals (version 01.0)

	This document was published in call for input 2023 - structured public consultation: Further input - Removal activities under the Article 6.4 mechanism web page
4 July 2023	A6.4-SB006-AA-A09 - Information note: Compilation of public inputs received on removals (version 01.0)
3 June 2023	64. A6.4-SB005-A02 – Information note: Guidance and questions for further work on removals (version 02.0)
17 May 2023	A6.4-SB005-AA-A09 – Information note: Removal activities under the Article 6.4 mechanism (version 04.0)
17 May 2023	A6.4-SB005-AA-A10 – Information note: Summary of the views submitted by Parties and observers on activities involving removals (version 01.0)
10 March 2023	A6.4-SB004-A02 - Information note: Guidance and questions for further work on removals (v.01.0)
28 February 2023	A6.4-SB004-AA-A04 - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 3.0)
07 November 2022	A6.4-SB003-A03 - <i>Recommendation</i> : Activities involving removals under the Article 6.4 mechanism (version 1.0)
25 October 2022	A6.4-SB003-AA-A03 - <i>Draft recommendation</i> : Removal activities under the Article 6.4 mechanism (version 2.0) A6.4-SB003-AA-A04 - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 2.0)
15 September 2022	A6.4-SB002-AA-A05 - <i>Draft recommendation</i> : Requirements for the development and assessment of mechanism methodologies pertaining to activities involving removals (version 1.0) A6.4-SB002-AA-A06 - <i>Information note</i> : Removal activities under the Article 6.4 mechanism (version 1.0)
08 July 2022	A6.4-SB001-AA-A05 - <i>Concept note</i> : Removal activities under the Article 6.4 Mechanism (version 1.0)