



## CALL FOR INPUT

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|------------------------------------------------------|----------------------------------------------------------|
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| <i>Date of submission</i>                            | 24 September 2025                                        |

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.

| Item | Section no.<br>(as indicated in the document) | Paragraph/Table/Figure no.<br>(as indicated in the document) | Comment<br>(including justification for change)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Proposed change<br>(including proposed text)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
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| 1    | General                                       |                                                              | <p>Given the complexity and relevance of the topic, the type of consultation undertaken is wholly inadequate.</p> <p>The MEP largely ignored the significant input received in the short consultation, despite the mandate provided by Parties at COP29 request the SBM to “engage, in consultation with interested stakeholders, further independent scientific and technical expertise” (Decision 6/CMA.6, para. 2).</p> <p>We are concerned that fewer than ten Parties have participated in the first round of consultation on this draft standard. As a Paris Agreement instrument, the Paris Agreement Crediting Mechanism (PACM) exists to support Parties in achieving their NDCs and enabling higher ambition, sustainable development, and environmental integrity.</p> <p>We take note of the decision of the SBM not to amend the Removals Standard but observe that this is an independent decision of the SBM rather than imposed by a CMA mandate or procedural rules. We recall that stakeholders and Parties did not have the chance to provide input to this standard as it was approved at SBM014 following a change in the legal status of the document from guidelines (which would have required adoption by the CMA) to standard (which immediately entered into force).</p> | <p><b>We urge the SBM to put the adoption of the standard on hold until the impact on all activity types can be properly assessed.</b> The standard should be reviewed and adopted in conjunction with the Reversal Risk Assessment Tool and the concept note addressing options for implementing paragraph 62(b) of the Removals Standard.</p> <p><b>We urge the SBM to launch a call for input on the Removals Standard</b> and consider amendments on the basis of the feedback received.</p> <p>Furthermore, we urge the SBM and the Secretariat to broaden Party engagement and anchor the non-permanence/reversals standard in Party-driven input, ensuring integrity and feasibility.</p> |

**Document reference number and title: A6.4-MEP008-A03. Draft Standard: Addressing non-permanence and reversals (version 02.2)**

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| 2    | App. 1, Section 2<br>(Definitions)                                                             | 3(g)                                                         | <p>The approach adopted by the MEP in defining this risk, coupled with some of the provisions of the Removals Standard, may subject land-based activities to perpetual monitoring requirements, which would result in the unwarranted exclusion of these activities from the PACM. As we understand this is not the intent of the MEP and the SBM, we strongly urge the SBM to reject this approach.</p> <p>Moreover, the inclusion scope of this definition in the draft standard appears to be in contradiction to the mandate given to the MEP. According to the “Workplan of the MEP in 2025”, the “risk rating that constitutes a negligible risk” should be addressed in the Reversal Risk Assessment Tool, not in the Standard on Addressing Non-Permanence and Reversals.</p>                                                                                                                                                                      | <p><b>We urge the SBM to request the MEP to conduct further research on the definition of negligible risk of reversals</b>, assessing the impact of different confidence intervals and time horizon. Such an assessment must be carried out with wide public stakeholder input and relying on external scientific and technical expertise.</p> <p>The MEP should also consider the inclusion of the concept of declining liability over time in the definition of risk. Such an approach would be in line with the best available science on the impact of CO2 in the atmosphere (Joos et. al, 2013).</p> |
| 3    | App. 1, Section 6<br>(Quantification of emission reductions and/or net removals and reversals) | 33-36                                                        | <p>We urge the SBM to adopt <b>Option 2</b> in v.1.0 of the draft standard. Given the potentially high buffer pool contributions for some activities, applying on the gross amount of A6.4ERs issued may impose prohibitive costs and impinge the economic viability of some projects. This will result in fewer activities registering with PACM, leading to higher emissions and lower receipts for the Adaptation Fund.</p> <p>We request the SBM to publish the legal advice and recommendations made by the Secretariat described in para. 31 of the Cover Note. Furthermore, we request the SBM to commission external legal advice on the matter. Alternatively, the SBM may adopt an exemption for A6.4ERs to be forwarded to the buffer pool, similar to the one adopted for the share of proceeds for adaptation for activities in Least Developed Countries (LDCs) and Small Island Developing States (SIDS) (Section V, Decision 6/CMA.6).</p> | Replace with paragraphs with <b>Option 2</b> in v.1.0 of the draft standard.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |

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| 4    | App. 2, Section 3 (Post-crediting period monitoring and reporting) | 40                                                           | <p>The Removals Standard does not set a minimum or maximum length of post-crediting monitoring. The MEP decision to instate perpetual obligations on project developers puts excessive burden on projects that may not be able to meet the conditions listed in para. 28 of the Removals Standard.</p> <p>We also recommend undertaking a legal analysis on how the PACM and SBM decision, along with the legal obligations and responsibilities they create, interact with the scope and objectives scope of the Paris Agreement. Given that the objectives of the Paris Agreement include the “balance of anthropogenic emissions by source and removals by sink in the second half of this century” (Art. 4.1) any obligations extending beyond 2100 may be considered null and void.</p> <p>Setting a potential end date to liabilities and obligations is crucial to enable its transfer to third party and allow the emergence of insurance policies and guarantees.</p> | We urge the SBM to set a maximum length of post-crediting monitoring period monitoring taking into account the best available science on the decay curve of CO2 in the atmosphere. |
| 5    | App. 2, Section 3 (Post-crediting period monitoring and reporting) | 41                                                           | As activity participants may be subject to long-term obligations and liability, it is important to ensure that they can be effectively transferred to third parties. Legal contracts must clearly define who is liable (e.g. project developer, registry, jurisdictional entity, etc.), under what conditions liability transfers, and the mechanisms by which performance is maintained.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | We request the Supervisory to add text aimed at providing contractual clarity and transferability.                                                                                 |