WWF Submission to the Article 6.4 Supervisory Body on Removals

15 March 2023

WWF is pleased to provide input to the Art 6.4 Subsidiary Body’s deliberations on the question of removals, in response to the following Decision by the CMA4:

19. Invites Parties and admitted observer organizations to submit, via the submission portal, by 15 March 2023, their views 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 rules, modalities and procedures;

20. Requests the Supervisory Body to consider the views of Parties and observers in elaborating and further developing recommendations on activities involving removals, as referred to in paragraph 19 above, on the basis of the rules, modalities and procedures, and taking into account the mandate provided to the Supervisory Body contained in paragraph 24(a)(ix) of the rules, modalities and procedures, for consideration and adoption by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement at its fifth session;

At COP27 WWF agreed with the decision by the CMA4 not to adopt the Guidance on Removals proposed by the 6.4 Supervisory Body.

WWF warmly welcomes the broader stakeholder dialogue. We are convinced that this will help the 6.4SB to further develop the Guidance document and pave way for its adoption at COP28 later this year.

WWF has identified the following key issues that need to be addressed in the Guidance:

1. The A6.4SB must take into account the decisions by CMA4 clarifying the difference between a) (authorized) 6.4ER:s and b) 6.4 mitigation contribution units. Since the procedure of Corresponding Adjustments by the host country is not required in the latter category, they must not be used as a basis for offsetting claims. Resolving the quality issues including permanence of sinks must be prioritized for the 6.4ER:s.

2. Any units issued to the Art6.4 markets must be based on real and measurable outcomes, not only processes. In this respect, the definition in the previous proposal to CMA4 was too vague.

3. Ocean carbon reservoirs involve a specific set of risks, challenges and opportunities:
   1. Deep ocean carbon reservoirs involving poorly understood processes with potential synergistic impacts and long-term effects, such as proposals to increase CO2 dissolved in ocean water or deposited on the ocean floor, must not be included in the scope of this Guidance. Generally, the scientific knowledge of the carbon flows of the ocean systems is not sufficient to define the baselines upon which anthropogenic measures could be assessed.
2. There are significant science and governance gaps to be considered, particularly in international waters; thus a precautionary approach must prevail. This is particularly important given uncertainties related to issues such as additionality, scale, permanence of carbon storage, leakage, and ocean-system feedbacks as the ocean is an open system. Ensuring transparent, fair and inclusive approaches will be essential.

3. However, concerning some site-specific blue carbon activities in well-studied and comprehensively-monitored coastal ecosystem, the science may be robust enough. Coastal blue carbon ecosystems – such as mangroves, seagrasses and tidal marshes – sequester and store globally significant quantities of carbon in their biomass and underlying soils, which can be released if these ecosystems are disturbed by anthropogenic activities. In addition to climate mitigation benefits, these ecosystems provide a multitude of other services including resilience to climate change impacts (e.g., extreme weather events, coastal erosion and sea-level rise), fisheries habitat and biodiversity benefits. Coastal and marine NbS have a particularly high potential for harnessing synergies across mitigation, adaptation and resilience efforts as blue carbon ecosystems often play a significant role in coastal adaptation and resilience for coastal communities, along with their mitigation potential.

4. The Guidance must clearly define the permanence of the reservoirs related to removals, as well as the nature of any units generated and how they can be used. There is a material risk of reversals over a relevant time frame in most kind of removal activities and therefore this issue needs proper attention in the Guidance.

   1. The A6.4 rules must ensure that removals activities for which credits are issued ensure the reservoirs are maintained over at least over a time frame comparable to fossil fuel emissions which they may be used to compensate. If the reservoirs cannot be maintained over such a period with a high likelihood, then temporary credits or other solutions to deal with permanence and reversibility should be issued.

   2. This includes avoiding any methodology that creates a false equivalence between temporary or inherently reversible removals and permanent emissions, including some approaches to tonne-year crediting.

5. Broadening the definition of Removals by including products as possible sinks is problematic, due to the large variability in permanence and the fact that no actors have formal control over the lifespan of products. We therefore suggest that products not be included.

6. The language concerning safeguards, respecting, promoting, and considering human rights including the rights of Indigenous Peoples, and avoiding negative impacts must be based on the agreement reached in Glasgow. Human rights should be upheld and negative impacts should be avoided, and there is no need to caveat this requirement or constrain the development of robust safeguards with a reference to national prerogatives.

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