



The COP29 Presidency approved the Supervisory Body's approach to adopting standards on methodologies and removals directly without first returning to the CMA with these standards as recommendations, as originally mandated. Carbon Market Watch urges the CMA to carefully consider how the adopted standards uphold the RMPs and to provide additional guidance to the Supervisory Body on the following issues that are left unanswered in the current standards.

Overall issues for both removals and methodological requirements

Expertise: ensure the Supervisory Body and MEP align with scientific expertise when operationalising further work pertaining to removals and methodological requirements

- Proposed text: "Recalling decision 7/CMA.4, annex II, paragraph 70, stresses the importance of establishing relevant dedicated expert groups, and *requests* the Supervisory Body and Methodology Expert Panel to draw on scientific expertise when developing standards, procedures, tools, and guidelines pertaining to A6.4-STAN-METH-001 and A6.4-STAN-METH-002."

Third party review: Mandate an independent third party, free of conflicts of interest, to conduct a regular review of registered activities' compliance with the standard.

- Proposed text: "*Requests* the Supervisory Body to mandate an external report every five years, starting in 2028, to assess the compliance of registered activities with the RMPs and the requirements referred to in A6.4-STAN-METH-001 and A6.4-STAN-METH-002."

Removals

Post-crediting monitoring: require a minimum post-crediting monitoring period.

- Proposed text: "*Requests* the Supervisory Body to establish an appropriate minimum length for the post-crediting monitoring period, in line with best available science, reflecting the lifetime of CO₂ in the atmosphere."

Risk assessment: ensure the risk assessment tool is developed in a science-based manner that conservatively evaluates the risk of reversal.

- Proposed text: “Requests the development of a science-based, conservative risk assessment tool to be developed in line with science, and informed by proactive consultations with scientific bodies.”

Use of reversal risk assessment tool: the reversal risk assessment tool should be used to determine whether or not the reversal risk of an activity is “negligible”.

- Proposed text: “Clarifies that the demonstration of whether or not a risk is considered to be negligible, as per paragraph 28a of A6.4-STAN-METH-002, shall be carried out using the reversal risk assessment tool as per paragraph 38.”

Determine a risk threshold for project eligibility: Ensure that projects with excessive reversal risk are not eligible to register under the mechanism, regardless of the amount of credits placed in the buffer.

- Proposed text: “Recalling paragraph 26(a) of A6.4-SBM014, clarifies that upper limits are needed, and requests the Methodology Expert Panel to determine a maximum risk threshold, based on best available science, above which activities shall not be eligible.”

Reversal remediation: Alternative means to remediate reversals must be equitable, grounded in the latest peer-reviewed science and maintain a conservative approach.

- Proposed text: “Requests the Supervisory Body in its development of remedial measures as per paragraph 62 of A6.4-STAN-METH-002, to adopt approaches that are conservative and in line with best available science. Any such remedial measures should uphold an equitable sharing of responsibilities between participating Parties and non-Party stakeholders such as authorized entities and activity participants.”

Buffer pool: clarify that buffer pool contributions must be drawn from issuance of the activity; specify that cancellations must match project type and at least the risk rating of the activity that has been subject to a reversal event; specify consequences for project proponents if they do not replenish the buffer after an avoidable reversal.

- Proposed text: “Recalling paragraph 55 of A6.4-STAN-METH-002, clarifies that, upon issuance of all A6.4ERs, an amount of A6.4ERs issued to the activity, proportionate to the issuing activity’s risk rating for both avoidable and unavoidable reversals, shall be forwarded to the Reversal Risk Buffer Pool Account.

Recalling paragraphs 53 and 58 of A6.4-STAN-METH-002, clarifies that buffer A6.4ERs canceled to remediate a reversal event shall be of the same activity type and have a reversal risk rating that is equal or lower to that of the activity for which the reversal has occurred.

Recalling paragraph 58 of A6.4-STAN-METH-002, *requests* the Supervisory Body to ensure clear provisions for liability and define rigorous other consequences in the event that an activity participant fails to conform with the requirement to fully replenish the Buffer Pool for avoidable reversals. Such consequences should include those indicated in paragraph 25 of A6.4-STAN-METH-002 as well as the exclusion of the activity participant from any participation in existing or future Article 6.4 activities.”

Monitoring report submission: define clearer rules around late, incomplete or missing monitoring report submission, notably a final deadline to be defined by SBM after which consequences are enforced such as deeming all issued A6.4ERs to be reversed, requiring remediation by the participant, and excluding the participant from the 6.4 mechanism.

- Proposed text: “Recalling paragraph 25 of A6.4-STAN-METH-002, *requests* the Supervisory Body, in the development of its guidance on and procedures for addressing late, incomplete, or missing monitoring report submissions, to establish clear criteria for potentially extending the monitoring report submission periods, subject to appropriate justification from the activity participant approved by the Supervisory Body. Also *requests* the Supervisory Body to define further rigorous consequences for non-conformance, including cancellation of all issued A6.4ERs from the activity and excluding the activity participant from any participation in existing or future Article 6.4 activities.”

Methodologies

Downward adjustment: ensure that any exceptions to the downward baseline adjustment are strictly based on the best available peer-reviewed science.

- Proposed text: “Recalling paragraph 27 of A6.4-SBM014, *requests* the Supervisory Body to carefully review any possible exceptions recommended by the MEP, ensuring they comply with the full requirements of paragraph 33 of the RMPs, especially with regard to aligning with the long-term temperature goal of the Paris Agreement.”

Additionality: For a performance-based approach, require it to be at least as stringent as the financial additionality test.

- Proposed text: “Recalling paragraphs 77 and 78 of A6.4-STAN-METH-001, *clarifies* that the demonstration of additionality by a performance-based approach, when this approach is used as an alternative, shall be as stringent as the demonstration of financial additionality.”