

## 'Under Cover of Night': Article 6.4 Supervisory Body recommendations document disregards rights, leaves door open for geoengineering, weakens ambition

*BACKGROUND: At the conclusion of COP26 in Glasgow last year, Parties created a supervisory body to determine the scope and shape of the Article 6.4 market mechanism. The Article 6 Supervisory Body was mandated to develop methodologies and consider the question of including removals in the 6.4 mechanism. In only their third meeting, and after working all through the night on the eve of COP, the Supervisory Body produced a document on removals that opens the door to almost any 'removal' including extremely dangerous geoengineering activities. CLARA provides a technical analysis below outlining our concerns. We urge the CMA to reject the document as it currently exists and send it back to the Supervisory Body for more work and consultations. The question of removals in markets is far too significant to leave to a rushed job by a small body, where only a handful of governments have any presence.*

- **Broad definition allows nearly everything to count as a removal for credit, including storage in 'oceans' and 'products'.** The definition is so broad it could include ocean fertilization and other types of marine geoengineering, despite the London Convention/Protocol decision to ban marine geoengineering and the Convention on Biodiversity COP 10 decision that reaffirmed that decision and any geoengineering that may impact biodiversity.
- **The Supervisory Body treats all types of removals and carbon as the same.** The document promotes 'fungibility' of carbon, creating a false picture of stability and permanence. Even good climate projects that do increase sequestration in the land sector can be reversed (for example due to a climate-fueled wildfire or shifts in government policies). Removals via the land sector should not be treated as the equivalent of reducing fossil fuel emissions.
- **The Supervisory Body takes a step back on protecting rights.** Market activities have a history of undermining human rights including the rights of Indigenous Peoples. The qualifier on national prerogatives is not in line with what was agreed in Glasgow and fundamentally undermines the protection of human rights including the rights of Indigenous Peoples.
- **The Article 6.4 recommendations released by the Supervisory Body are retrograde in their consideration of carbon markets.** A number of voluntary markets have been set up outside of UNFCCC auspices that have faced strong criticism for having inadequate standards or verification systems in place. The list of potentially allowed activities by this wide definition does not reflect a 'best practice' approach to carbon market creation and makes no attempt to establish a best practice of carbon market creation, or in any other way to require that markets take steps to protect their integrity.
- **The Supervisory body has opened the door to projects that will make the 6.4 mechanism toxic.** The definition of removals is so broad, that with the rest of the methodology undefined, it will likely incentivize projects that present major risks to communities and may not even deliver on climate benefits. These types of hugely problematic projects can lead to the mechanisms' collapse. The Supervisory Body needs to learn from past mistakes in this regard.

**By opening up crediting for a wide variety of potentially problematic projects, the Supervisory Body would enable rich countries and corporations to avoid making rapid and deep decarbonization commitments.** As developing countries register their concern with the volume of climate finance that comes in the form of loans rather than grants, so too should they be concerned with the diversion of climate finance into an 'international cooperation' mechanism that may provide no mitigation and likely will do real harm to communities.