



CALL FOR INPUT

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Document reference number and title: (Recommendation from the MEP to SBM020)

A6.4 MEP012-A01: Draft Methodological tool: Analysis of lock-in risk (version 02.0)

Item	Section no. (as indicated in the document)	Paragraph/Table/Figure no. (as indicated in the document)	Comment (including justification for change)	Proposed change (including proposed text)
1	METHODOLOGICAL APPROACHES	Step 2, Para 19 (Selection of Alternatives)	CDU and HWP provide a dual benefit of carbon sequestration and displacement of emission-intensive materials (e.g., steel/cement). Failing to distinguish them from standard "industrial" alternatives ignores their role in reaching net-zero.	Proposed Change: Explicitly include "Carbon Capture and Utilization (CDU) integrated with intensive land use and HWP" as a category for comparison against national benchmarks.
2	METHODOLOGICAL APPROACHES	Step 2, Para 19 (a) (National Circumstances)	Best Available Technologies (BAT) from developed nations may not be financially or technically feasible in developing contexts. Lock-in assessments should not penalize projects that represent the "best possible" local leapfrog technology.	Add a clause: "The assessment of alternatives must prioritize the technological feasibility and availability of HWP/CDU infrastructure in developing countries."
3	METHODOLOGICAL APPROACHES	Step 2, Para 20 (GHG Intensity Thresholds)	The 20% threshold for long-lived assets (25+ years) may be too restrictive for HWP facilities in developing countries where the "Business as Usual" (BAU) is significantly more carbon-intensive.	HWP projects often require long technical lifetimes for economic viability. A fixed 20% threshold might inadvertently lock out carbon-negative wood product industries in favor of shorter-lived but higher-emitting alternatives.
4	METHODOLOGICAL APPROACHES	Step 3, Para 26 (Resource Use Efficiency)	Intensive land management for HWP maximizes Carbon Dioxide Removal (CDR). High resource efficiency should be credited where intensive management prevents land degradation and maximizes wood density/output.	Clarify that "Intensive land use for HWP" should be assessed based on net carbon yield per hectare rather than simple land-area footprints.

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5	METHODOLOGICAL APPROACHES	Step 3, Para 27 (a) (Financial Feasibility)	High-value HWP and CDU technologies often face higher CAPEX in developing countries. Revenue from Article 6.4 credits is the primary driver to overcome these barriers and avoid the "lock-in" of cheaper, less efficient practices.	Strongly support the inclusion of A6.4ER revenues in determining the feasibility of efficient alternatives.