



CALL FOR INPUT

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

A6.4 MEP012-A02: Draft Standard: Demonstration of additionality in mechanism methodologies (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	REQUIREMENTS FOR SPECIFIC APPROACHES	Footnote to Para 29(c) (Lowest GHG technologies)	HWP and CDU represent a "net-negative" pathway rather than just an emission reduction. Specifying these at the methodology level allows for clearer additionality demonstration for projects that go beyond simple "avoided emissions."	Ensure that "lowest GHG emitting technologies" specifically includes HWP and CDU systems that utilize intensive land management to maximize net removals.
2	REQUIREMENTS FOR SPECIFIC APPROACHES	Para 31(d) (Availability of Alternatives)	Standard alternatives (e.g., fossil-fuel based construction) may be the only "available" options in developing nations. Recognizing HWP/CDU as non-standard but feasible alternatives ensures they are not unfairly excluded by "lock-in" rules designed for developed markets.	Clarify that "Availability and feasibility" must be assessed within the context of developing country infrastructure and access to specialized CDU markets
3	REQUIREMENTS FOR SPECIFIC APPROACHES	Para 50 (Investment Comparison Analysis)	This exemption is critical for HWP. A transition from traditional agriculture to intensive, managed forestry for wood products represents a change in service that must be permissible when demonstrating additionality for carbon removal and storage.	Strongly support the exemption for land-use activities from the "same type/level of service" requirement.

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4	REQUIREMENTS FOR SPECIFIC APPROACHES	Para 53 (Barrier Analysis Applicability)	These technologies often face prohibitive "information" and "institutional" barriers in new markets. Allowing barrier analysis (rather than strictly investment analysis) reflects the high-risk nature of establishing wood-product value chains in developing economies.	Propose that "First-of-its-kind" CDU and HWP manufacturing facilities in developing countries be eligible for barrier analysis.
5	REQUIREMENTS FOR SPECIFIC APPROACHES	Para 57(d) (National Circumstances)	Emphasize that "national pathways" should recognize the role of intensive land use in achieving host country NDC targets.	Intensive land use for HWP is a primary tool for developing countries to achieve large-scale removals. The additionality standard must remain flexible enough to support these national strategic pathways.