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Document reference number and title: (Recommendation from the MEP to SBM020) Concept note: Options for implementing the provisions in paragraph 62 of the "Standard: Requirements for activities involving removals under the Article 6.4 mechanism (version 01.0)				
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	-	1	The Carbon Business Council (CO2BC) is a global coalition representing more than 100 carbon management organizations across all major pathways who are united to build a more prosperous planet. Our coalition accelerates market development across sectors and continents through ecosystem building, policy engagement, and public affairs. We welcome the opportunity to provide input on the documents discussed at the 14th (A6.4-MEP014) Methodological Expert Panel (MEP) meeting, which articulate requirements for activities involving removals under the Article 6.4 mechanism. The Standard outlining requirements for activities involving removals under the Article 6.4 mechanism sets a strong foundation to incentivize durable, high-quality removals. CO2BC supports the recognition under this standard that durable, high-quality credits with negligible risk of reversal should be afforded proportionately reduced reversal risk buffer pool contributions. This, and other important benefits such as registry tagging, recognize the rigorous monitoring, reporting, and verification (MRV) requirements that can provide a high degree of confidence across many carbon dioxide removal (CDR) pathways. The comments outlined in more detail below focus on two overarching points, detailed below: The Paris Agreement Crediting Mechanism (PACM) should take a technology-inclusive approach to enabling carbon dioxide removal High-integrity, durable carbon dioxide removal is subject to rigorous MRV. Well-established MRV can provide a high degree of confidence that reversal risks are low or negligible. It will be important for PACM standards and methodologies to recognize and differentiate this from other mitigation pathways as it continues to operationalize its guidance on reversal risk. The Carbon Business Council and our membership would be pleased to support further efforts to develop and operationalize the integration of CDR into the Paris Agreement Crediting Mechanism under Article 6.4	N/A
2	3. Key issues and proposed solutions	3.2.4: Monetary Permanence Reserve	As outlined in MEP guidance to date, credits with negligible reversal risk should make proportionate (i.e., negligible) contributions to mechanisms to manage reversal risk, including buffer pool accounts or alternative	At end of paragraph 78, include mention of the use of a monetary permanence reserve as a demand signal that may mitigate concerns around timing and availability of credits. Add an additional section on the consideration of a

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			mechanisms. However, these mechanisms to manage reversal risk could play an important role in bolstering demand for durable, high-integrity carbon dioxide removal pathways. The draft considers a monetary permanence reserve that can only use negligible risk or no risk of reversal credits to retire liabilities. A monetary permanence reserve that purchases and cancels negligible or no risk credits could stimulate demand for these credits by acting as a clear demand signal for project developers that are struggling to secure financing due to current uneven demand signals. This demand creation may mitigate the concern of "future price and availability of A6.4ERs with negligible or no reversal risk."	Monetary Permanence Reserve as a complement to the Buffer Pool.