

SB64 Article 6.2 Ambition Dialogue

Civil society perspectives on key technical design elements of cooperative approaches

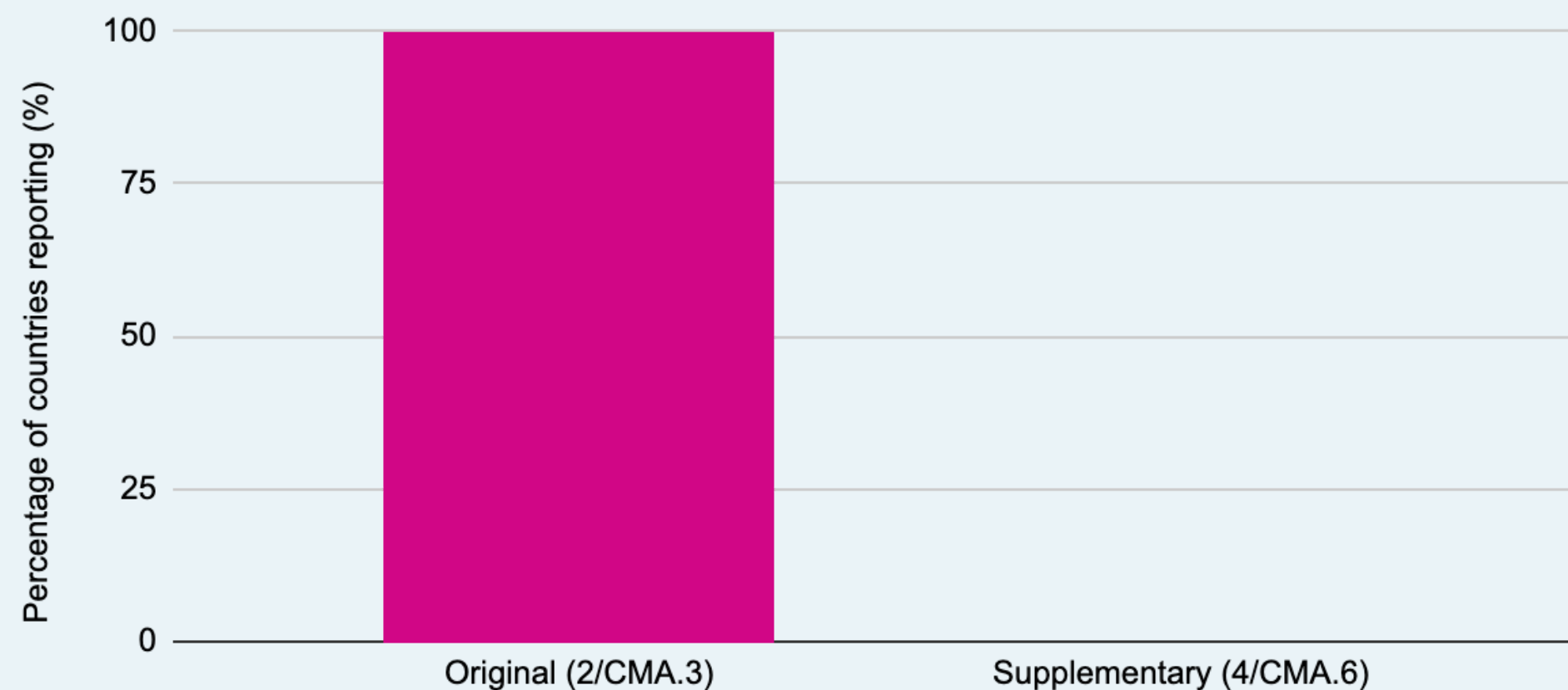
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Reporting on supplementary requirements from Baku decision (4/CMA.6)

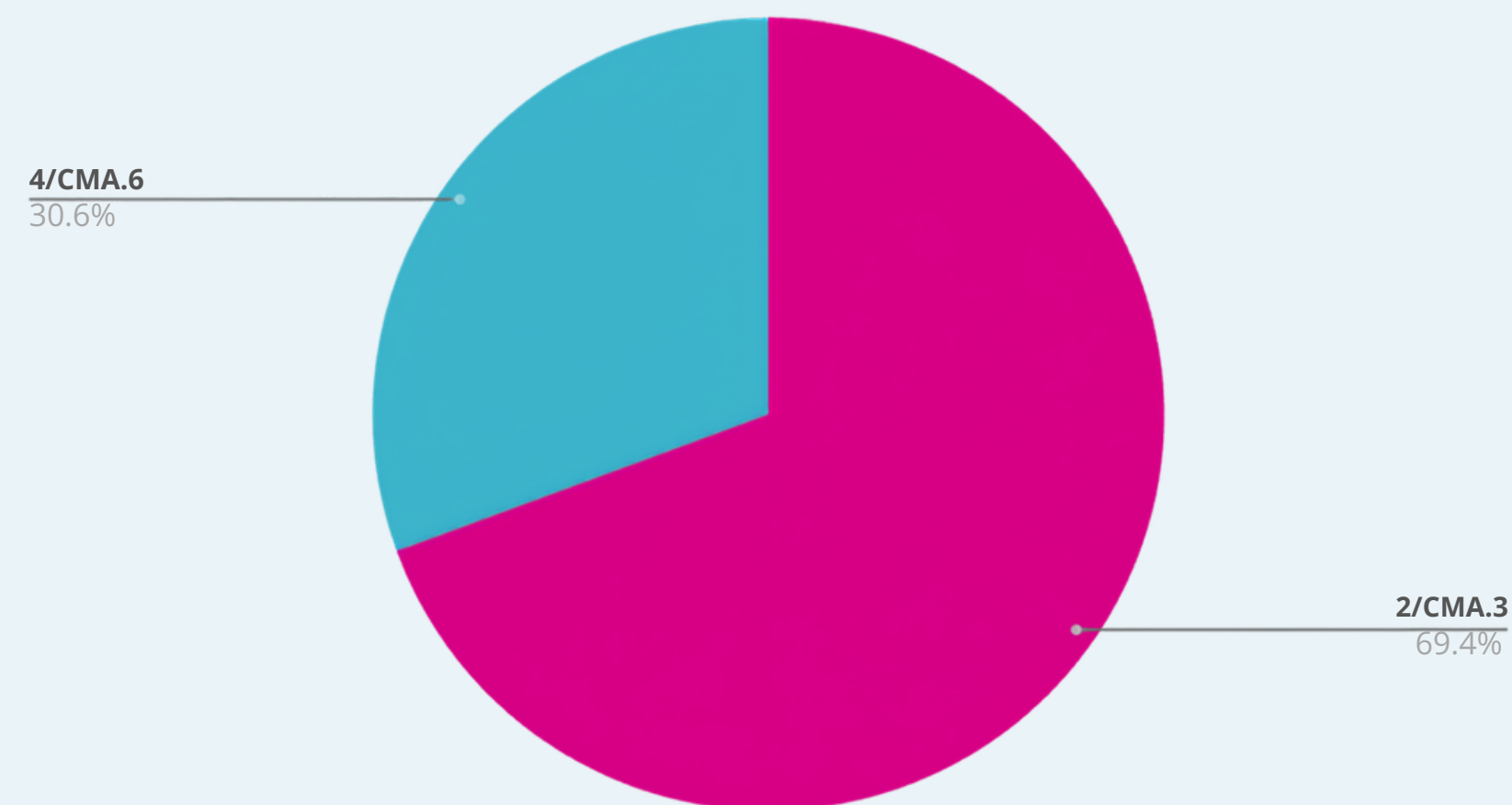
None of the countries reported on **any** of the 15 supplementary requirements, e.g.

- “Description of **how the mitigation outcomes** from the cooperative approach **are shared** between the participating Parties” (18.H.1)
- “Description of how uncertainties in the quantification of emission reductions and removals are assessed and **how such uncertainties are taken into account**” (18.H.2)

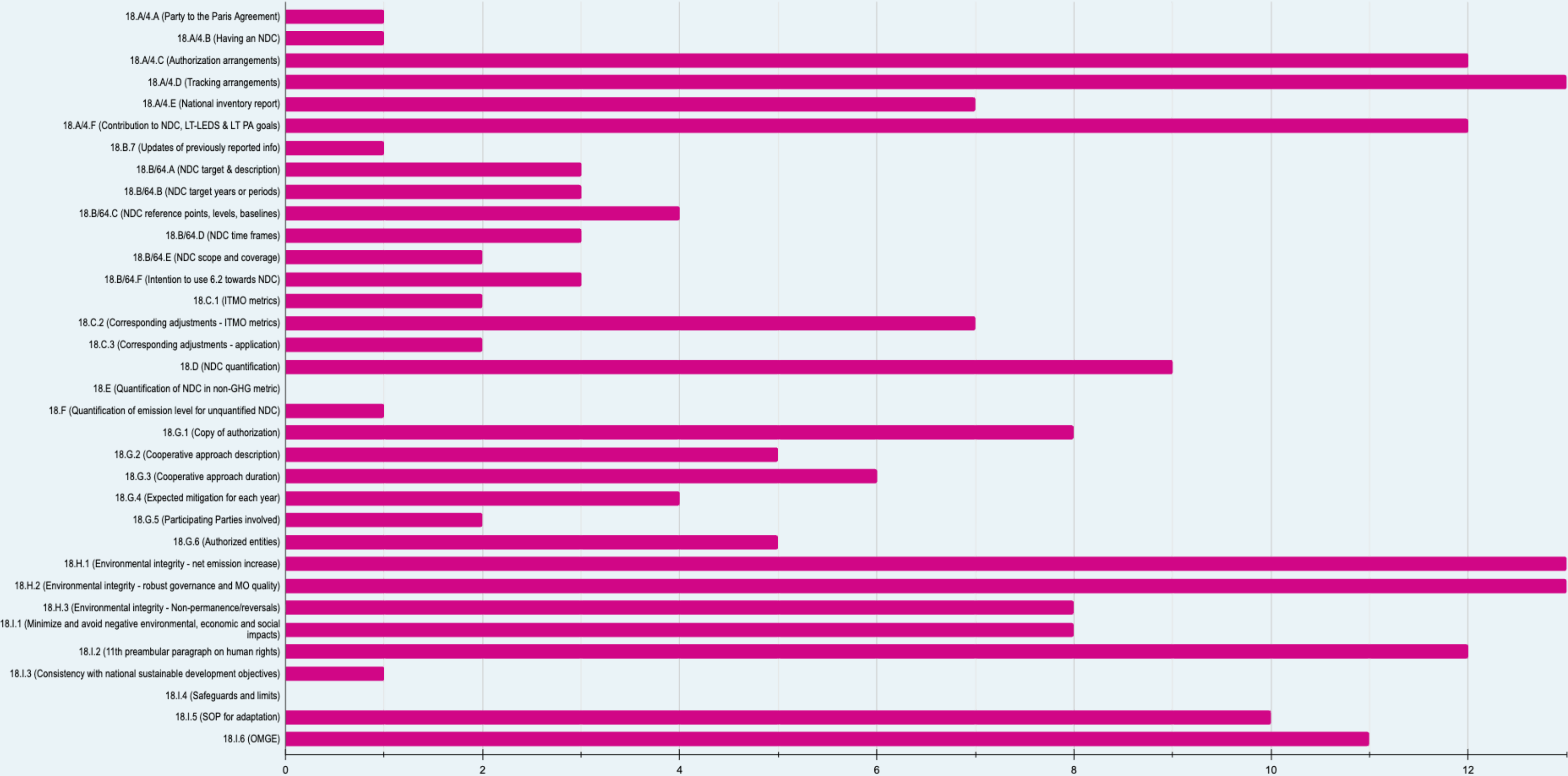
Reporting on 2/CMA.3 vs 4/CMA.6 IR requirements



Where do the IR reporting requirements come from?



Number of inconsistencies identified in TERs from 2024-2025 (13 countries in total) by reporting requirement



Number of inconsistencies identified in TERs from 2024-2025 (13 countries in total), by reporting requirement, 'significant' separately

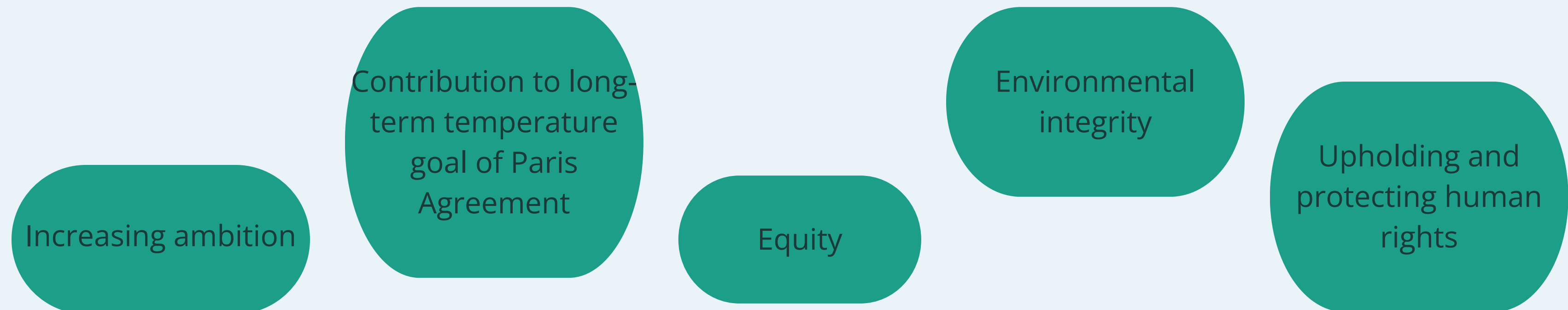


Note: The official classification of a "significant inconsistency" was introduced for the 2025 review cycle under decision 4/CMA.6. Therefore, all inconsistencies identified in the 2024 reports (Switzerland, Ghana, Guyana, Thailand, and Vanuatu) are "normal" inconsistencies, since that specific designation did not yet exist.

High inconsistency areas are most crucial for people and planet

- **All** reviewed reports thus far (13 in total) have inconsistencies in 18.H.1/18.H.2 (**Environmental integrity**)
- **All but one** reviewed report (12 in total) have inconsistencies on 18.A/4.F (Contribution to NDC, LT-LEDS & LT PA goals) and 18.I.2 (**Reflecting the 11th preambular paragraph on human rights**)

Cooperative approach design should center on:



13 June 2026

Thank you for the opportunity to speak today during this Dialogue. I am Isa Mulder from Carbon Market Watch. I'm speaking on behalf of the ENGO constituency.

This statement is without prejudice to the ENGO position that rejects the practice of offsetting. We are highly concerned with the reliance on Article 6 carbon markets in the newest NDCs. Offsetting with carbon credits represents neither climate action nor climate finance: instead, it is a highly problematic asset trade that risks exacerbating global inequality and enabling and perpetuating business-as-usual for big polluters. **We reiterate the need for all Parties to prioritize genuine domestic mitigation over outsourcing reductions.**

Notwithstanding those principled objections, I would like to share a civil society perspective on **how design choices of cooperative approaches are affecting environmental integrity, human rights protections, and climate ambition**. As observers of Article 6 rather than participants, we cannot speak to how these design choices were made, but we can reflect on how the information comes across to us, broader civil society, and the public. We would like to make a couple of remarks on what all the technical expert review reports published so far, including the eight reports published in the last few weeks, tell us.

First of all, we welcome the clear identification of significant inconsistencies and the addition of a summary table for them, following the Baku decision. This table helps to make the review's main findings more accessible for observers such as ourselves.

Nevertheless, **the overall accessibility of information under Article 6.2, including in the technical expert reviews, remains a major obstacle for many observers**. Transparency and access to information are not merely about quantity of information, but also about how this information is given and when. For civil society rightsholders, for example, those in host or buyer countries who want to find out how their government is engaging with Article 6, or a local community facing an Article 6 activity, would likely still have significant difficulty finding and deciphering the technical Article 6 review reports. It is critical that rightsholders are able to monitor and engage in these activities, and that means making this information more accessible: **we urge Parties to dedicate time to improving this, in dialogue with observers and especially said rightsholders.**

Speaking of access to information, the supplementary elements for the Initial Report requirements from paragraph 18 of the Baku decision have not been reported on by any Party, and this doesn't seem to have consequences, as this did not result in any inconsistencies identified by the Technical Expert Review team. **This is concerning, especially given that these elements pertain to crucial information on environmental integrity, accessibility, and equity.**

Regarding the information that has been reported and reviewed: taking into account both the recent and the batch of technical expert reviews from last year, 13 review reports in total, we can now conclude that in every initial report reviewed, inconsistencies, or, for the second batch after Baku, significant inconsistencies, were found regarding the reporting requirements for environmental integrity. This means that **none of the cooperative approaches give confidence that environmental integrity is ensured, which should be a key pillar of a framework supposed to increase climate ambition.**

In addition to these findings, all Parties' reports, except for Palau's report, are found to have inconsistencies on how human rights, the rights of Indigenous Peoples, gender equality, intergenerational equity, respect for labor rights, etc., are reflected in the cooperative approach. **Overall, the glaring lack of concrete, comprehensive human rights and environmental safeguards in most Initial Reports is deeply worrying, regardless of whether there is an inconsistency or not.** Since 'significant' inconsistencies are understood to be limited to those that affect the emissions balance of Parties, none of these inconsistencies on this topic are classified as significant, but this should not be interpreted as meaning they are not serious.

In short, reviewers seem to be ringing the alarm bells on all cooperative approaches, despite their hands being mostly tied by a limited mandate. **The problem here is not the review. The problem is the information reported, and thereby, the cooperative approaches themselves.** None of the cooperative approaches we've seen thus far even meet the reporting bar set by the 6.2 guidance, which - we must remind everyone - is nowhere near as high as the PACM or leading voluntary market standards. Not being able to report on how a cooperative approach avoids locking in emission levels, or whether its decision-making processes include opportunities for public participation and scrutiny, is extremely telling about the robustness and due diligence of that approach. Therefore, a first step would be for Parties to treat the supplementary initial report elements from Baku as core considerations for their cooperative approach design, and to include adequate information on those elements in all future Initial Reports.

A focus on maximizing flexibility, rather than on minimizing the negative global and local impacts of cooperative approaches, will have serious, real-world consequences, as shown by decades of evidence from global carbon markets.

Thank you.