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How to ensure environmental integrity of Article 6.2: additionality determination, baseline determination, safeguarding of permanence and alignment with NDCs and LT-LEDs

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- Large body of research, including empirical studies, exists on:
- Additionality determination
 - Barrier tests do not work
 - Regulatory, investment and common practice testing need to be combined, anchored in an investment test whose parameters are carefully checked by the independent auditors
- Baseline setting
 - Complex methodologies are barriers to participation of smallholders and IPs
 - Conservative default parameters enable reduction of such barriers
 - Values of default parameters need to be assessed very carefully
 - Negative example: Fraction of non-renewable biomass for cookstoves
 - High-forest-low deforestation country baselines for avoided deforestation
- Addressing non-permanence
 - “Like-for like” approach
 - Forward looking contribution rates for buffer pools given increasing reversal risks



- **Alignment** with NDCs and LT-LEDS
 - capacity building, international academic collaboration, and technology transfers are critical
 - economic and political modelling tools.
 - enable informed debates and decisions on volume of ITMOs reasonable to authorise
 - safeguard domestic mitigation ambition and gender-responsive sustainable development, underpinning a just transition including livelihood protection, meaningful participation and equitable benefit-sharing
 - Parties should clearly communicate environmental and sustainable development benefit safeguards on host-country alignment with NDCs - LT-LEDS when acquiring ITMOs, and enable host countries through upfront capacity building to align as far as possible
- General requirement for all fields: transparency
 - data from the international Article 6.2 registry should be fully accessible in a timely manner; commercial confidentiality should not be invoked
 - Good research on Article 6 requires data accessibility