

Agenda item 3.3.

Paragraph 15 of the annotated agenda, Annex 03

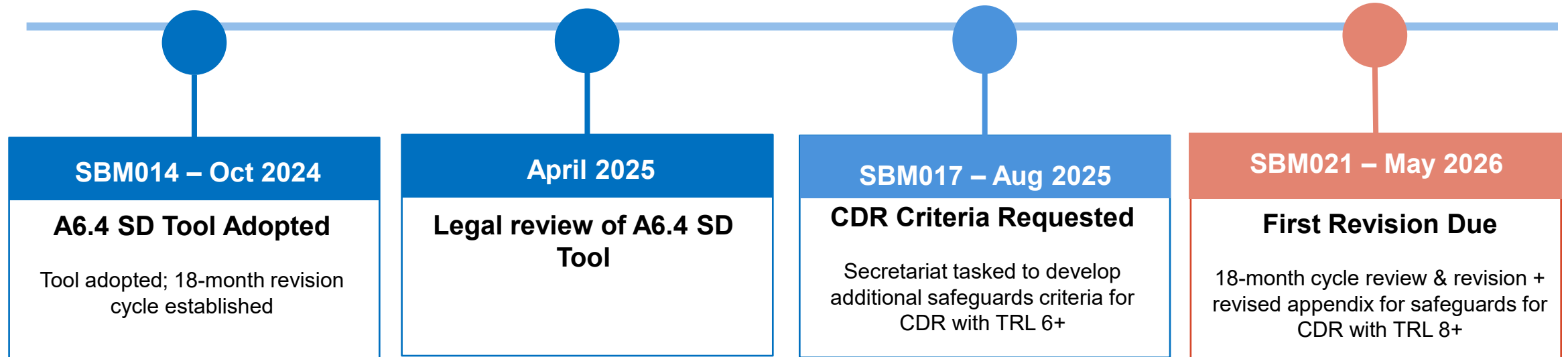
The Revised A6.4 SD Tool

Article 6.4 Supervisory Body – 21st meeting

Bonn, Germany, 18 to 21 May 2026



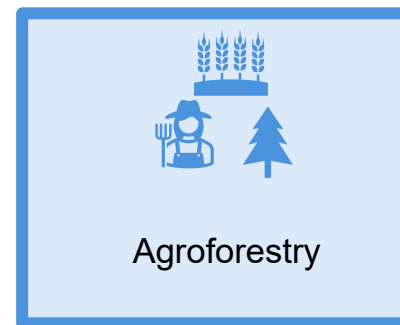
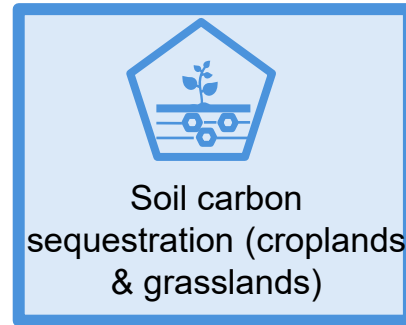
Procedural background



Purpose

1. Reflect the outcome of the review of the current A6.4 SD tool; and
2. Develop requirements for carbon dioxide removal (CDR) activities with TRL 8+* by revising appendix 1 of the draft A6.4 SD tool presented at SBM 011** and considering input received during SBM 011 and the requirements of A6.4-STAN-METH-001 and A6.4 STAN-METH-002.

CDR activities with TRL 8+ ***



* Revision to include criteria & guiding questions for CDR with TRL 6+ will be conducted in the latter half of 2026

** <https://unfccc.int/sites/default/files/resource/A6.4-SB011-AA-06.pdf>

*** Intergovernmental Panel on Climate Change (2022), the Sixth Assessment Report



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Key issues and proposed solutions - Overview

1. Review of the existing A6.4 SD Tool

1.1 Literature Review

1.2 Activity Participants Survey

1.3 Inputs from DOE/AE forum

1.4 Review of A 6.4 SD tool application

1.5 Latest A6.4 standards and legal review

2. New requirements for CDR with TRL 8+

2.1 Legal review of the methodology standard and appendix 1 of the draft A6.4 SD tool presented at SBM 011

2.2 Review of safeguards of voluntary mechanisms



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Key issues and proposed solutions: 1.1 Literature Review

Review of two publications on the A6.4 SD tool from the Sustainable Development Initiative* and the Wuppertal Institute**

Usability & Practical Application	Overall Approach & Coverage	Capacity Building Needs
<ul style="list-style-type: none">▪ No digital interface, manual input only▪ Lack of guiding examples and built-in guidance in A6.4 SD forms▪ Heavy UNFCCC-specific vocabulary	<ul style="list-style-type: none">• Clear linkage to host country policies & SD priorities• Integration with national environmental impact assessments• Lack of activity or sector-specific pre-defined indicators• Gap between national SDG targets & project-level indicators linked to them	<ul style="list-style-type: none">• Webinars• Explanatory videos and training material



Revised A6.4 SD tool

Included in this revision	Not included in this revision
<ul style="list-style-type: none">• Additional examples added to the tool• Definitions and examples for technical/ UNFCCC-specific terms• Reference to national environmental impacts assessment (EIA) included	<ul style="list-style-type: none">• Digital interface and linkage to individual host country policies due to budget constraints.



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* (Oct 2025) "A6.4 SD tool – new benchmark for carbon markets?"

** (Nov 2025) "Piloting A6.4 SD Tool – Lessons from Early Use" 5

Key issues and proposed solutions: 1.2 Activity Participant Survey

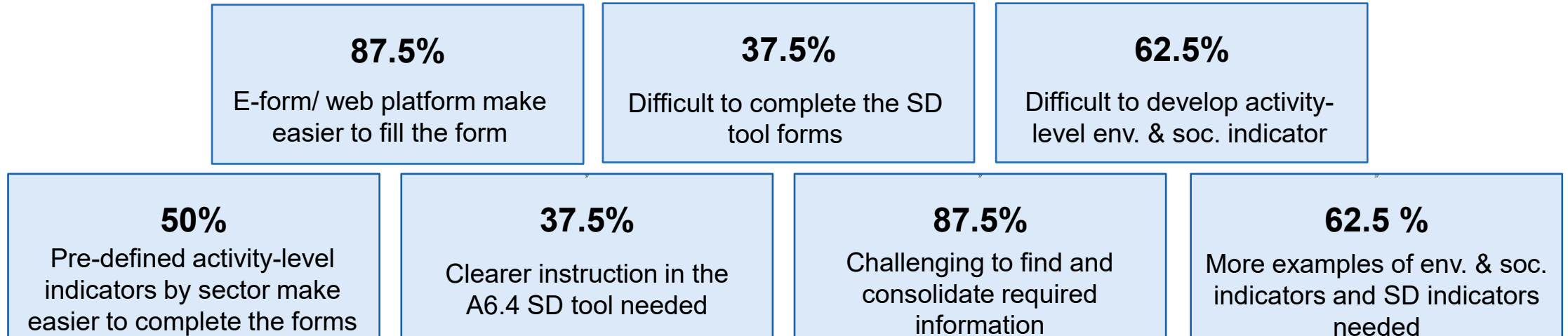
Survey context:

☐ 9 transition activities approved by SBM

☐ 19 Feb – 31 Mar 2026

☐ 8 out of 9 responded by deadline

Key Findings from Survey Responses



Revised A6.4 SD tool

Included in this revision

- Additional examples of env., soc., & SD indicators
- Clear instructions in the A 6.4 SD tool
- Reference to EIAs included

Not included in this revision

- E-form/ web platform – Not included due to budget constraints



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Key issues and proposed solutions: 1.3 Inputs from DOE/AE forum & 1.4 Review of A6.4 SD tool application

1.3 DOE/AE forum

- Clarity of para 24 (b) (ii), 33, 35, 41 and 42
- Clarity of activity-level SD indicator in para 91(d) and 92(d)
- Editorial errors in Figure 2 and para 91(d) (ii) and 99

1.4. Review of the A6.4 SD tool application by 9 projects requested for CDM transition*

- Need for a clear reference to environmental impact assessments in the preparation of env. & soc. risk assessments
- Need for clearer explanation of key terms with examples
- Need for examples
- Need for consistent terminology

* 9 requests out of 23 requests have been approved by SBM as of 31 March 2026

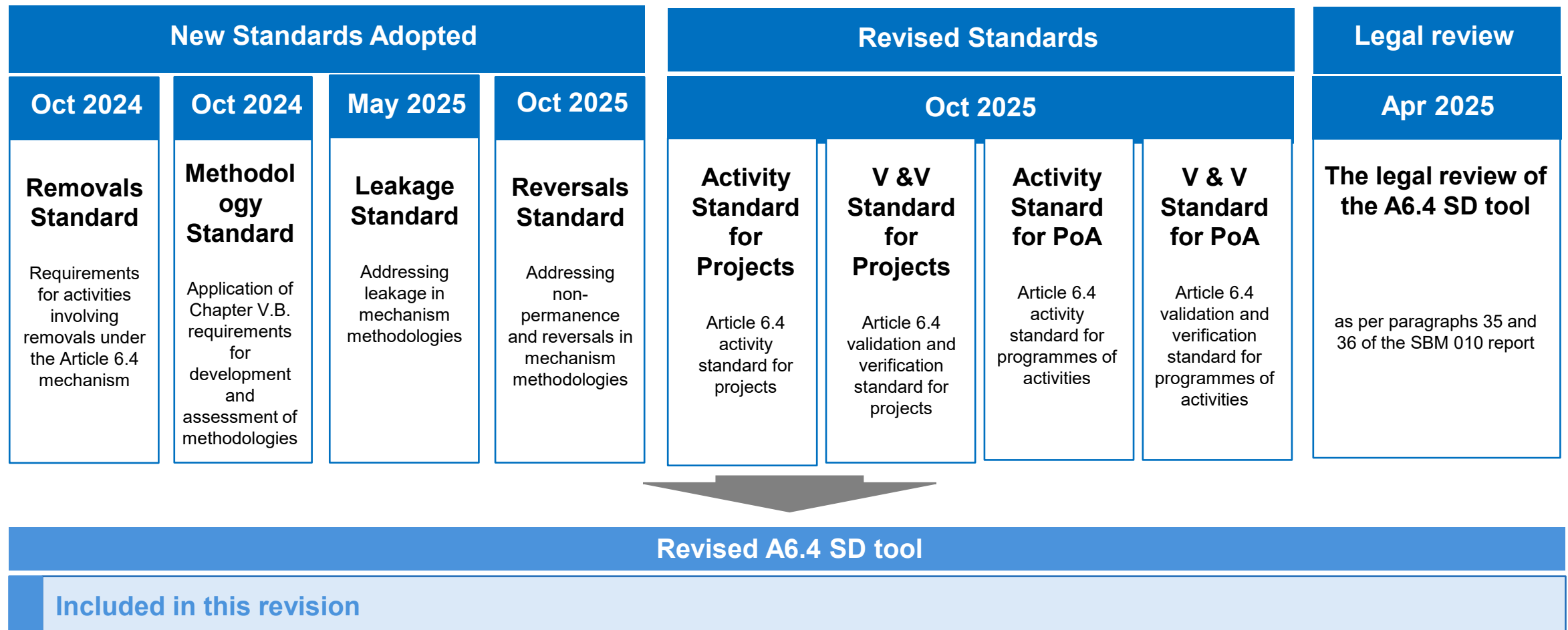
Revised A6.4 SD tool

Included in this revision

- Inputs from DOE/AE forum were incorporated into the relevant sections of the revised A6.4 SD tool
- References are added to env. impact assessments for the preparation of env. & soc risk assessment
- Examples and/or definitions of specific terms added to improve clarity for practitioners
- Additional examples of activity-level env./soc. indicators and SD indicators



Key issues and proposed solutions: 1.5 Latest A6.4 standards and legal review



- All the requirements/provisions which have impacts on the A6.4 SD tool have been identified and included in the revision
- Legal review has been included in the revision



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Key issues and proposed solutions: 2.1 Legal review of relevant standards and appendix 1 -1

Legal review clarified how Cancun safeguard requirements should be reflected in mechanism methodologies and the A6.4 SD tool, based on the methodology and leakage standards

Appendix 1 of the draft A6.4 SD tool presented at SBM 011

- Based on Cancun Safeguards

Para 87 – Methodology Standard

- *For REDD+ activities (those activities falling under the scope of A 5.2 of the Paris Agreement), mechanism methodologies shall require, in addition to all relevant requirements adopted by the Supervisory Body, demonstration that the activity is included in all the elements required of the host Party as per decision 1/CP.16, paragraph 71*

Para 16 – Leakage Standard

- *If the proposed Article 6.4 activity is not yet included in all the elements required of the host Party as per decision 1/CP.16, paragraph 71, mechanism methodologies may require, on an interim basis, a letter from the host country's national entity or focal point referred to in decision 2/CP.10 (i.e., the REDD+ focal point) indicating when the proposed Article 6.4 activity will be included in all the elements above. The inclusion shall occur no later than verification and be verified by the DOE.*

Outcome of the Legal Review

CDR and REDD+ Overlap: 3 CDR activity types with TRL 8+ overlap with REDD+, i.e. afforestation/reforestation, agroforestry and improved forest management.

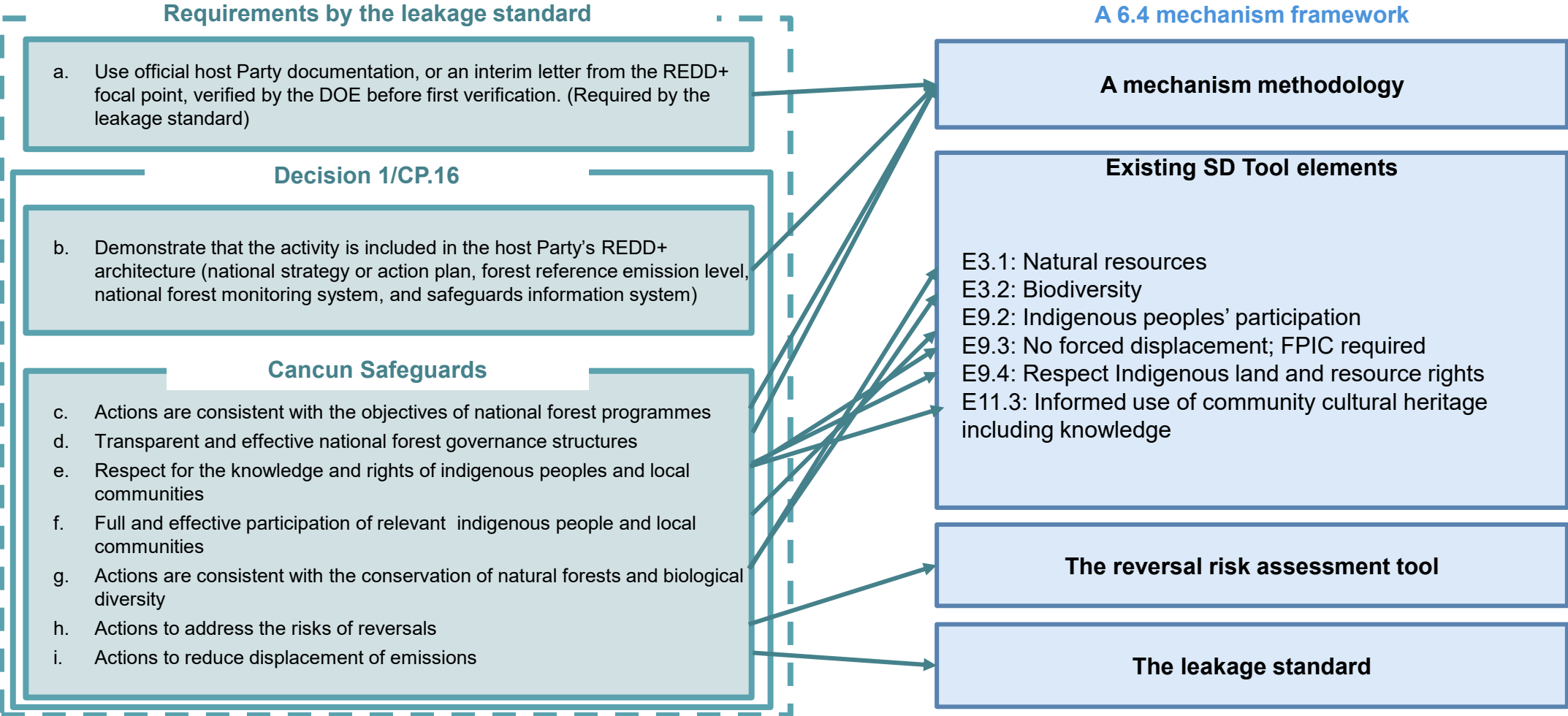
Mechanism methodologies: REDD+ architecture – national strategy/action plan, forest reference emission level, national forest monitoring system, and safeguards information system and **Cancun Safeguards** regarding the objectives of national forest programmes and transparent and effective national forest governance structures

A6.4 SD tool: Cancun Safeguards regarding indigenous peoples and local communities and conservation of natural forests and biological diversity



Key issues and proposed solutions: 2.1 Legal review of relevant standards and appendix 1 -2

Since all REDD+ requirements under the Leakage Standard are already incorporated into the Article 6.4 mechanism framework, no revision to Appendix 1 of the draft A6.4 SD tool are proposed on the basis of the legal review.



Key issues and proposed solutions: 2.1 Legal review of relevant standards and appendix 1 -3

Review of A6.4 removals standard

- Para 16 states that “Mechanism methodologies shall include provisions for monitoring and mitigating any risks identified in section 4.6.1 Reversal risk assessment, and any risks identified in the Sustainable development tool of the Article 6.4 mechanism, including through the free, prior and informed consent of Indigenous Peoples directly or indirectly affected by the activity.”
- In the section 4.6.2. Reversal-related notifications and actions, para 50 states that “The activity participants shall also review the compliance with the requirements and safeguards contained in the Sustainable development tool, taking into account any negative environmental and social impacts caused by the reversal and developing plans to prevent the recurrence of such negative environmental and social impacts.”
- Para 65 states “The activity participants shall apply robust social and environmental safeguards to minimize and, where possible, avoid negative environmental and social impacts of the activity”

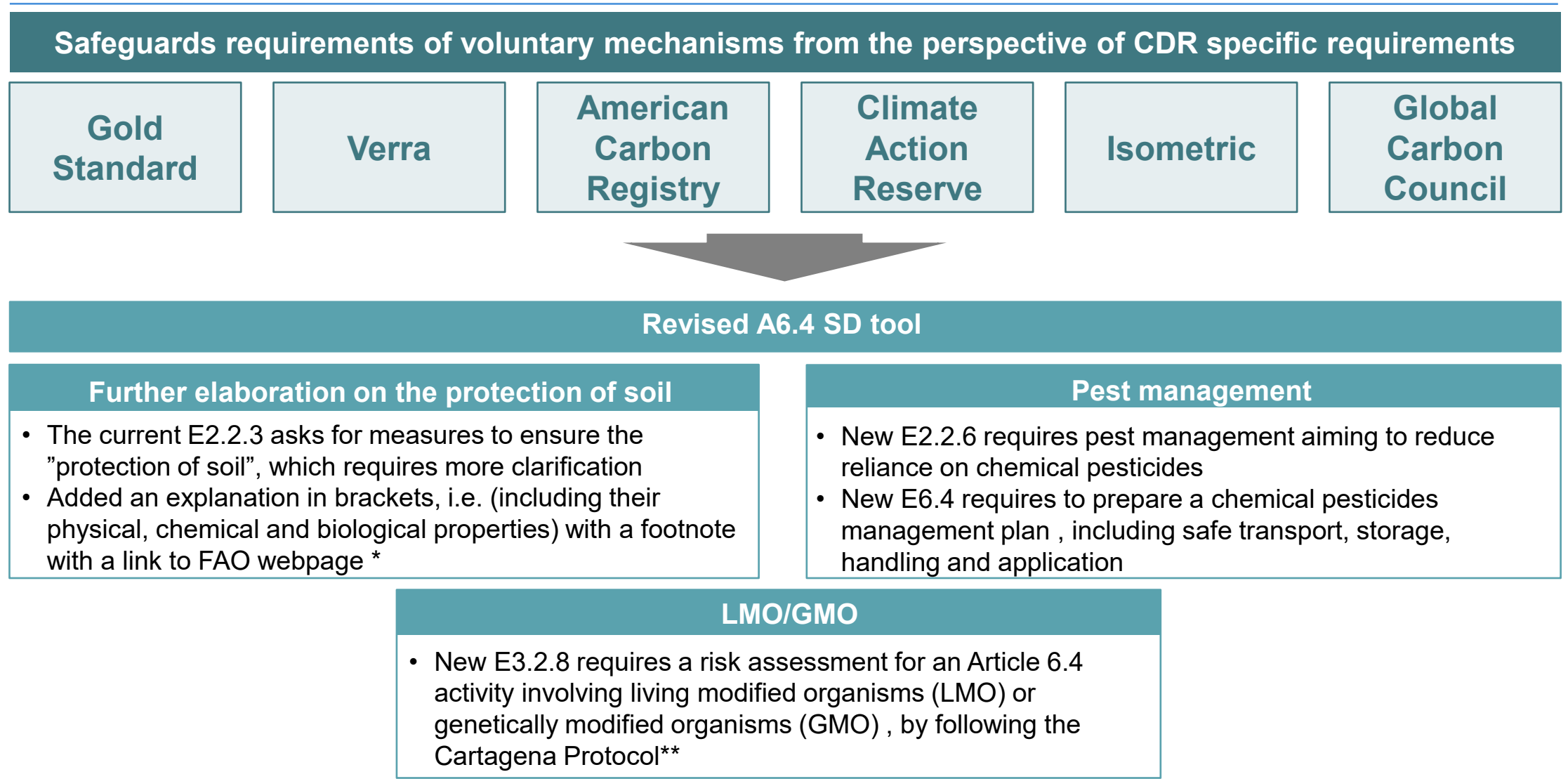
Revised A6.4 SD tool

Appendix 2 developed by introducing new para 14 in the revised A6.4 SD Tool.

Appendix 2 has been developed to provide structured approach to address potential negative impacts to env. & soc. as a result of a release of a stored GHG for CDR activities with TRL 8+.



Key issues and proposed solutions: 2.2 Review of safeguards of voluntary mechanisms



Summary of Proposed Changes

Guidance and clarity improvement

1. **Clear Instructions:** Clarity in instruction has been enhanced throughout the tool
2. **Additional Guiding Examples:** New examples added to the tool, with definitions for technical and UNFCCC specific terms.
3. **Environmental Impact Assessment Reference:** Reference to national environmental impact assessments now included
4. **Alignment with the latest A6.4 standards:** All the requirements/provisions in adopted/revised A6.4 standards reflected.
5. **Soil Protection:** Further elaboration on the protection of soil added

New Requirements

1. **Appendix 2:** For CDR activities with TRL 8+ to address reversals related impacts.
2. **Pest Management:** New requirements on pest management have been introduced
3. **LMO/GMO:** A new requirement on living and genetically modified organisms has been added



The Supervisory Body may

- **Consider** and **adopt** the revised A6.4 SD tool as presented, with modifications as appropriate; and
- **Request the secretariat to**
 - Update Related Forms (A6.4-FORM-AC-015, A6.4-FORM-AC-016, A6.4-FORM-AC-017); and
 - Prepare additional criteria and guiding questions for safeguards for CDR activities with TRL 6 and above, including biochar, direct air capture with geological storage, and bioenergy with carbon capture and storage.



STAKEHOLDER INPUTS RECEIVED



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Inputs to the SBM021 annotated agenda

- 10 submissions received, including one late submission from the University of California, Berkeley, and University of California, Irvine.

List of stakeholders who submitted inputs

German Institute for Global and Area Studies (GIGA)/ Carbon Market Watch

Opan Brazil, Inesc Brazil, Censat Agua Viva – Friends of the Earth Colombia, C, Heks and Swiss Lenten Fund (Fastenaktion)

Women's Earth and Climate Action Network (WECAN)

Women and Gender Constituency (WGC)

Solidarity Center

IPFCC

MPIDO and the Grassroots Justice Network

Grassroots Justice Network

University of California, Berkeley and University of California, Irvine



Summary of the Inputs to the SBM021 annotated agenda - 1

- Strengthen independent third-party assessment, validation, and verification of environmental and social risks.
- Alignment with international human rights standards and recognized international best practices.
- Consideration of 10 environmental and social safeguards elements (1-9 and 11) for identification of risks and potential negative impacts of reversal in the appendix 2.
- Recognition of Indigenous Peoples, Indigenous laws, cultural values, legal systems, customary governance structures, Indigenous Peoples' rights to participate in or abstain from Article 6 activities as rightful owners of mitigation outcomes on their territories.
- Extension of the application of FPIC to local communities.
- Consideration of risks affecting the integrity of FPIC processes, including coercion and retaliation.
- Extend stakeholder identification and consultation to communities and stakeholders within the broader area of influence of activities.
- Use of local and native languages and culturally appropriate approaches for stakeholder engagement.
- Inclusion of standalone provisions on stakeholder engagement and continuous engagement mechanisms.

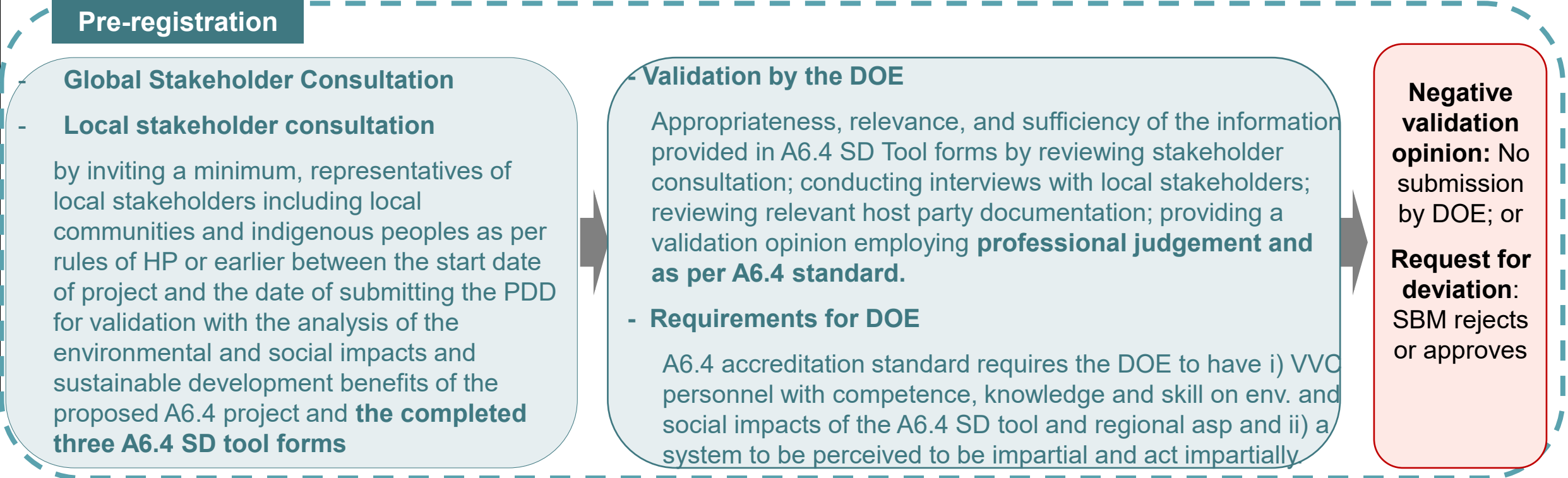
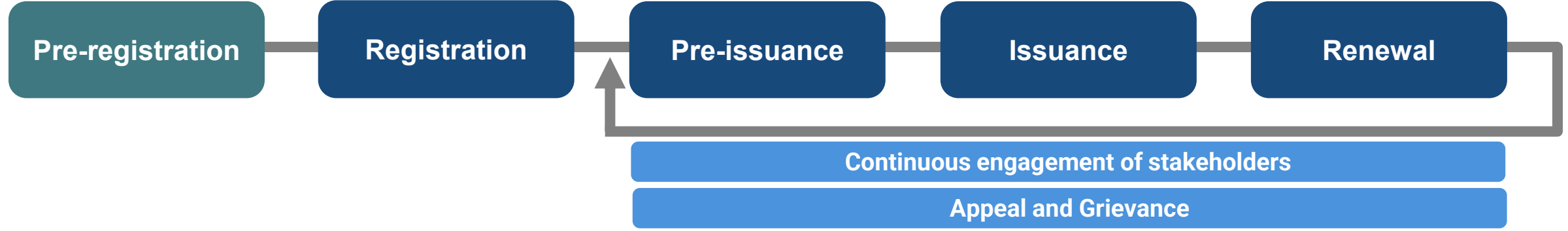


Summary of the Inputs to the SBM021 annotated agenda - 2

- Reinforcement of element 8 (land acquisition and involuntary resettlement) on land rights including customary land rights, land acquisition, involuntary displacement, and livelihood restoration.
- Consideration of equitable benefit-sharing for Indigenous Peoples and affected local communities.
- Improvement of risk screening, categorization, and mitigation procedures, including consideration of Indigenous perspectives.
- Exclusion of 'potentially' as a response option in environmental and social risk assessments.
- Include criteria for addressing risks of gender-based violence, sexual harassment, and sexual exploitation and abuse.
- Monitoring of environmental, social, and sustainable development indicators during and after the crediting period



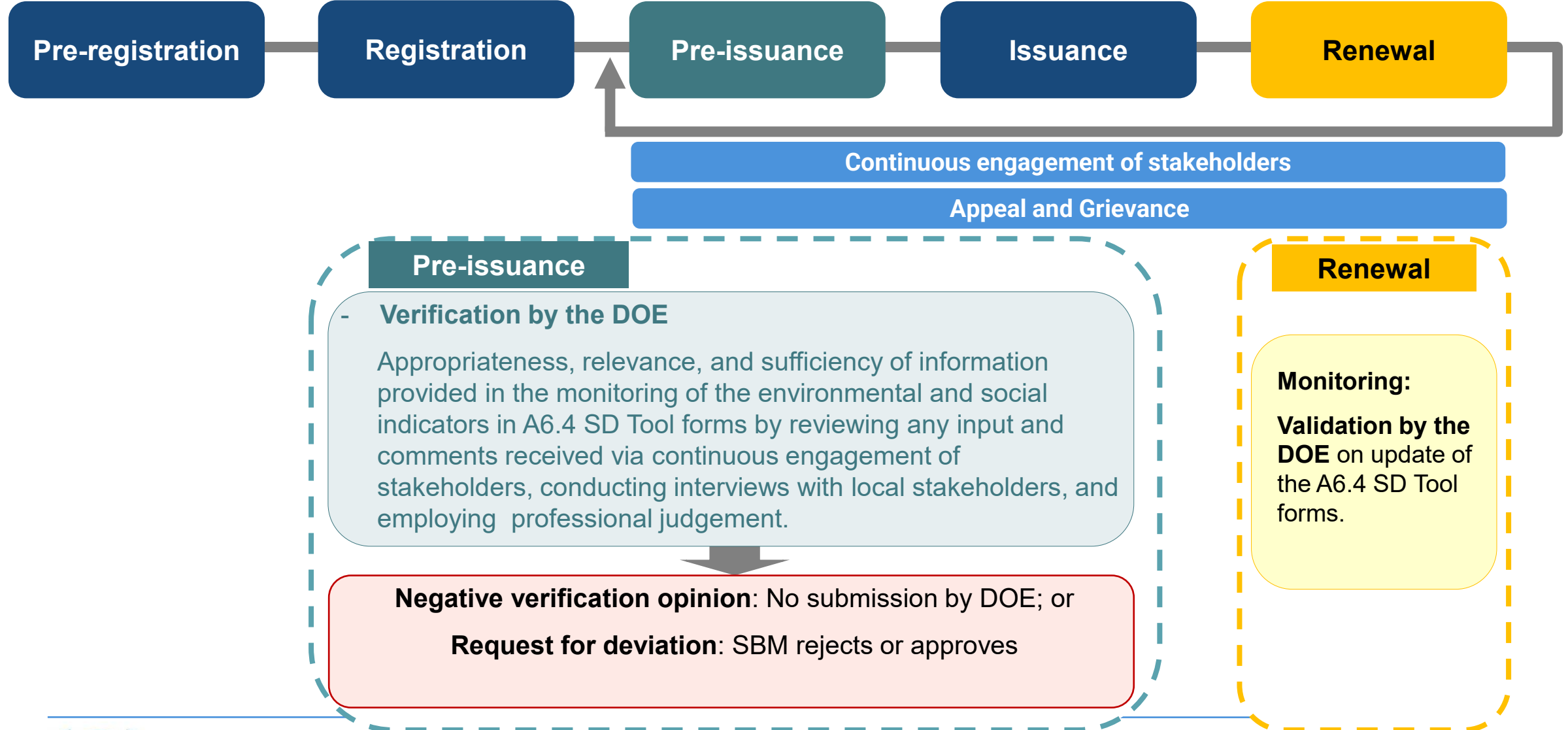
A6.4 SD tool in PACM Activity Cycle



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A6.4 SD tool in PACM Activity Cycle



Thank You



SUGGESTED WAY FORWARD



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Suggested way forward

