

Agenda item 3.3.

Paragraph 16 of the annotated agenda, Annex 5

Transition of CDM afforestation and reforestation (A/R) activities to the Article 6.4 mechanism

Article 6.4 Supervisory Body – 23rd meeting

Bonn, Germany, 5 to 9 October 2026



Procedural background

- **SBM006:** adoption of the following documents:
 - “*Standard: Transition of CDM activities to the Article 6.4 mechanism*” (transition standard)
 - “*Procedure: Transition of CDM activities to the Article 6.4 mechanism*” (transition procedure)
- **SBM014:** adopted the Article 6.4 sustainable development tool (A6.4 SD Tool).
- **SBM015:** revised the transition standard and transition procedure to reflect that A/R project activities and programmes of activities (PoAs) registered under the CDM (hereinafter referred to as CDM A/R activities) may transition to the Article 6.4 mechanism and be registered as Article 6.4 activities
- **SBM015:** approved the “Information Note: Workplan of the Methodological Expert Panel 2025” (A6.4-SBM015-A02), which reaffirmed the MEP’s mandate to propose a draft methodological standard addressing non-permanence and reversals as well as a draft methodological tool on reversal risk assessment.



Procedural background

- **SBM020:** revised the transition procedure to extend the deadline for the host Party of the CDM to submit to the Supervisory Body its approval for the transition of CDM project activities or PoAs to the Article 6.4 mechanism, from 31 December 2025 to 30 June 2026.



Purpose

- ❑ Identify solutions for the Supervisory Body to address the inability of project participants of transitioning CDM A/R activities to submit the required additional documentation by the current deadline, given that the relevant documents are not yet available; and to
- ❑ Revise the “Procedure: Transition of CDM activities to the Article 6.4 mechanism” accordingly.



1) Relevant requirements for transition to the Article 6.4 mechanism

- Requirements applicable to all transitioning CDM activities
 - ✓ Obtain host Party approval of transition of CDM project activities or PoAs to the Article 6.4 mechanism, to be submitted by 30 June 2026 [*decision 20/CMA.7, paragraph 25; transition procedure, paragraph 9*]
 - ✓ Activity may continue to apply the currently applied CDM methodology until the earlier of the end of the current crediting period or PoA period as applicable, or 31 December 2025. After that date, it shall apply an Article 6.4 mechanism methodology. [*transition standard, paragraph 24*]
 - ✓ PPs shall analyse environmental and social impacts and sustainable development benefits of their operation, and provide a summary of the analysis and a monitoring plan of such impacts and planned remedial measures of negative impacts, if any, during the operation of the activity, in accordance with the A6.4 SD Tool [*transition standard, paragraph 38*]



2) Relevant requirements for transition of CDM A/R activities to the Article 6.4 mechanism

- Comply with the RMPs for the Article 6.4 mechanism, the respective applicable requirements for activities involving removals under the mechanism contained in the Supervisory Body standard **“Requirements for activities involving removals under the Article 6.4 mechanism” (hereinafter referred to as the removals standard)**, and any future relevant CMA decisions [*decision 6/CMA.6, paragraph 21(c)*]
 - ✓ Relevant elements of the removals standard [*transition standard, paragraph 31*]:
 - a) Identification of risk of reversals;
 - b) Reversal risk assessment;
 - c) Reversal risk mitigation plan;
 - d) Remediation of reversals;
 - e) Post-crediting period and monitoring plan.



2) Relevant requirements for transition of CDM A/R activities to the Article 6.4 mechanism (cont.)

- Application of the A6.4 SD Tool.
 - ✓ Footnote 4 of the A6.4 SD Tool further specifies that additional safeguards criteria and guiding questions to be applied for carbon dioxide removal activities and for land use, land-use change and forestry activities will be developed by the Supervisory Body as new annexes to include in this SD Tool at an appropriate stage in its development of regulations for activities involving removals.



3) Submission of additional documentation and the gap for transitioning CDM activities

- The transition procedure, paragraph 31, states that if the project participant continues to apply the currently applied CDM methodology to the transitioning CDM activity, in accordance with the relevant provisions in the transition standard, it shall, no later than 31 December 2026, submit additional documentation to attest that the transitioning CDM activities:
 - a) Have been implemented in accordance with the registered PDD, or PoA-DD and CPA-DDs (hereinafter referred to as activity design documents);
 - b) Comply with additional requirements for registration under the Article 6.4 mechanism in accordance with the relevant provisions in the transition standard.
- For transitioning CDM A/R activities, the additional documentation required includes the elements set out in slides 6 and 7.



3) Submission of additional documentation and the gap for transitioning CDM activities (cont.)

PPs of transitioning CDM A/R activities will not be able to submit the additional documentation by the 31 December 2026 deadline, for the following reasons:

- The RRAT applicable to A/R activities would not be considered for adoption by the SBM in 2026. The RRAT for consideration at SBM023 would apply only to types of activities which reduce consumption of non-renewable biomass, including cookstove methodologies.
- For A/R activities transitioning with their applicable CDM methodology, no guidance is currently available for the identification of risks of reversals, development of a reversal risk mitigation plan, remediation of reversals, and development of a post-crediting monitoring plan (hereinafter referred to as reversal-related guidance).
- The elements of the A6.4 SD Tool applicable to A/R activities would not be considered for adoption by the SBM in 2026. The adoption of a revised SD tool with new annexes applicable to removal activities is planned for early 2027.



4) Considerations for determining timelines for submission of additional documentation for transitioning CDM A/R activities

- ✓ **Development timeline for the applicable reversal risk assessment tool.** A revision to the reversal risk assessment tool to include the activity type-specific component applicable to A/R activities is expected to be developed after SBM 023 in October 2026 and would require approximately six months to be finalized, i.e., by mid-2027 at the earliest;
- ✓ **Absence of reversal-related guidance.** The MEP has no mandate yet to develop such guidance;
- ✓ **Development timeline for elements of the A6.4 SD tool** applicable to removal activities, which is expected to be adopted at SBM 024 in February 2027;
- ✓ **Capacity and time needed for project participants to comply** with the documents and guidance to submit the required additional documentation for A/R activities.



5) Possible solutions for consideration by the Supervisory Body

The Supervisory Body may wish to consider:

- Requesting the MEP to develop, reversal-related guidance for project participants of transitioning CDM A/R activities to comply with the requirement to submit additional documentation
- Requesting the MEP to accelerate the development of the Reversal Risk Assessment Tool applicable to A/R activities
- Accelerating the development of the elements of the A6.4 SD tool applicable to removal activities
- Extending the deadline for project participants to submit additional documentation applicable to transitioning CDM A/R activities to: six months from the adoption of all relevant documents, or 31 December 2027, whichever is later.



- Given that all relevant documents required for CDM A/R activities to complete the transition to the Article 6.4 mechanism will not be finalized in 2026, it is necessary for the Supervisory Body to extend the deadline for submitting additional documentation.
- The proposed solutions would guarantee project participants at least a six-month compliance window.
- It is to be noted that CDM A/R activities account for a relatively small proportion of transitioning CDM activities, comprising **14** of the **418** activities that have obtained host Party approval to transition to the Article 6.4 mechanism, i.e., **13** projects and **1** PoA.



Recommendations to the Supervisory Body

The secretariat recommends that the Supervisory Body:

- **Request the MEP** to develop the applicable reversal risk assessment tool and reversal-related guidance for project participants of transitioning CDM A/R activities to comply with the requirement to submit additional documentation;
- **Request the MEP** to accelerate the development of the Reversal Risk Assessment Tool applicable to A/R activities;
- **Request the secretariat** to accelerate the development of the elements of the A6.4 SD tool applicable to removal activities;
- Consider **extending the deadline** for project participants to submit additional documentation applicable to transitioning CDM A/R activities to six months after the adoption of all relevant documents, or to 31 December 2027, whichever is later; and
- **Adopt** the revised “Procedure: Transition of CDM activities to the Article 6.4 mechanism”.



Subsequent work and timelines

The secretariat will undertake further steps to implement the decisions of the Supervisory Body on the development of reversal-related guidance and the submission deadline for additional documentation applicable to transitioning CDM A/R activities, respectively.



- **Submitter: VEDA Climate Change Solutions Lt**
 - Issue: Emphasizing on the importance of the AFOLU sector in India, the submitter proposes that host Party approval for transition CDM A/R projects not be required as the CDM projects/PoAs have been already approved under the CDM by the host Party



Recommendations to the Supervisory Body

The secretariat also recommends that the Supervisory Body:

- **Request the MEP** to develop a revision to CDM A/R methodologies and related tools

Background and justifications

- CMA7 requested the SBM to prioritize work on the revision of CDM methodologies applicable to transition activities.
- 13 A/R CDM projects and 1 A/R CDM PoA have requested transition from the CDM to the A6.4 mechanism and received host Party approvals by 30 June 2026.
- Out of which, **12 projects and the PoA selected to continue applying CDM A/R methodologies**. 1 project chose to switch to an A6.4 A/R methodology.
- Under CDM:
 - a) AR-ACM0003 and AR-AMS0007: A/R project activities implemented on lands other than wetlands
 - b) AR-AM0014 and AR-AMS0003: A/R project activities implemented on wetlands
 - c) 10 associated methodological tools for A/R

