

**A6.4-STAN-AC-005**

## Standard

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# Article 6.4 validation and verification standard for programmes of activities

Version 02.0



**United Nations**  
Framework Convention on  
Climate Change

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# 1. Introduction

## 1.1. Background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), at its third session, adopted rules, modalities and procedures (RMPs) for the mechanism established by Article 6, paragraph 4, of the Paris Agreement (the Article 6.4 mechanism)<sup>1</sup> and requested the Supervisory Body, among others, to develop provisions for the development and approval of methodologies, validation, registration, monitoring, verification and certification, issuance, renewal, first transfer from the mechanism registry, voluntary cancellation and other processes pursuant to chapters V.B–L and VIII of the RMPs.<sup>2</sup>
2. The CMA, at its fourth session, elaborated some elements of the RMPs relating to the operation of the activity cycle of the Article 6.4 mechanism.<sup>3</sup>
3. The Supervisory Body, at its thirteenth meeting, adopted the “Article 6.4 validation and verification standard for programmes of activities” (hereinafter referred to as this standard) that sets out the requirements relating to validation and verification for Article 6.4 mechanism programmes of activities (A6.4 PoAs) and component projects (CPs).
4. The Supervisory Body, at its fourteenth meeting, adopted the “Standard: Application of the requirements of Chapter V.B (Methodologies) for the development and assessment of Article 6.4 mechanism methodologies”<sup>4</sup> (hereinafter referred to as the methodologies standard), the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism”<sup>5</sup> (hereinafter referred to as the removals standard) and the “Tool: Article 6.4 sustainable development tool” (hereinafter referred to as the A6.4 SD Tool). The two standards set out the requirements for the development and assessment of Article 6.4 mechanism methodologies and the requirements for activities involving removals and emission reduction activities with reversal risks under the Article 6.4 mechanism, whereas the A6.4 SD Tool provides means for activity participants to demonstrate that they have met the mandatory requirements for identifying and addressing social and environmental risks, as well as for assessing and enhancing the contributions of A6.4 activities to sustainable development in line with sustainable development objectives and priorities of the host Party and the sustainable development goals (SDGs).

## 1.2. Objectives

5. The objective of this standard is to set out requirements relating to validation and verification for Article 6.4 mechanism programmes of activities (A6.4 PoAs) and component projects (CPs) that may be included in registered A6.4 PoAs.

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<sup>1</sup> Decision 3/CMA.3, annex, as contained in document FCCC/PA/CMA/2021/10/Add.1. Available at: [https://unfccc.int/sites/default/files/resource/cma2021\\_10a01E.pdf](https://unfccc.int/sites/default/files/resource/cma2021_10a01E.pdf)

<sup>2</sup> Decision 3/CMA.3, paragraph 5(a).

<sup>3</sup> Decision 7/CMA.4, annex I, chapters III–VI, in document FCCC/PA/CMA/2022/10/Add.2. Available at: [https://unfccc.int/sites/default/files/resource/cma2023\\_10a02E.pdf](https://unfccc.int/sites/default/files/resource/cma2023_10a02E.pdf)

<sup>4</sup> Available at: <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-001.pdf>

<sup>5</sup> Available at <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-002.pdf>

## **2. Scope and entry into force**

### **2.1. Scope**

6. This standard provides designated operational entities (DOEs) with minimum requirements for validation of a proposed or registered A6.4 PoA of its compliance with the relevant design requirements and other attributes for registration, post-registration changes and renewal and the equivalent processes for CPs, as well as for verification of greenhouse gas (GHG) emission reductions or net GHG removals achieved by a registered A6.4 PoA.

### **2.2. Entry into force**

7. This document enters into force on 16 May 2025.

## **3. Terms and definitions**

8. The following terms apply in this standard:

- (a) “Shall” is used to indicate requirements to be followed;
- (b) “Should” is used to indicate that among several possibilities, one course of action is recommended as particularly suitable;
- (c) “May” is used to indicate what is permitted;
- (d) “Activity participant” is a public or private entity that participates in an A6.4 PoA;
- (e) “Methodology” is, unless otherwise specified, an Article 6.4 mechanism methodology referred to in the RMPs, as approved by the Supervisory Body, to set a baseline for the calculation of emission reductions and removals to be achieved by Article 6.4 mechanism projects and PoAs (hereinafter collectively referred to as A6.4 activities), to demonstrate the additionality of A6.4 activities, to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by A6.4 activities.

## **4. Principles**

### **4.1. General**

9. The principles<sup>6</sup> that follow guide the preparation, execution and reporting of validation and verification activities.

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<sup>6</sup> This text is taken from ISO 14064-3:2019 - Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions and is reproduced with the permission of the International Organization for Standardization (ISO). This standard can be obtained from any ISO member from the website of the ISO Central Secretariat at the following address: <[www.iso.org](http://www.iso.org)>. Copyright remains with ISO.



#### **4.2. Impartiality**

10. Design and execute the validation or verification activity so that it is objective and does not introduce bias.

#### **4.3. Evidence-based approach**

11. Ensure that the validation or verification activity employs a rational method for reaching reliable and reproducible validation or verification conclusions and is based on sufficient and appropriate evidence.

#### **4.4. Fair presentation**

12. Ensure that the validation or verification activity, findings, conclusions and reports are truthfully and fairly presented. Report significant obstacles encountered during the validation or verification, as well as unresolved, diverging opinions among validators or verifiers, to the responsible party (e.g. the United Nations Framework Convention on Climate Change (UNFCCC) secretariat (hereinafter referred to as the secretariat) or the Supervisory Body) and the client (e.g. the activity participants).

#### **4.5. Documentation**

13. Document the validation or verification and ensure that it establishes the basis for the conclusion and conformity with the criteria.

#### **4.6. Conservativeness**

14. When assessing comparable alternatives, use a selection that is cautiously moderate.

### **5. General validation and verification requirements**

#### **5.1. Validation and verification approach**

15. The DOE shall select a competent team to perform the validation or verification for the A6.4 PoA or CP in accordance with the "Article 6.4 accreditation standard".
16. In carrying out its validation or verification work, the DOE shall:
  - (a) Follow this standard and integrate its provisions into the DOE's own quality management systems;
  - (b) Apply the most recent applicable decisions and guidance provided by the Supervisory Body;
  - (c) Determine whether each proposed or registered A6.4 PoA or included CP meets all applicable Article 6.4 mechanism rules and requirements, including those specified in the "Article 6.4 activity standard for programmes of activities" (hereinafter, referred to as the activity standard), the selected methodologies, the selected standardized baselines and any other standards, methodologies, methodological tools and guidelines applied in accordance with the selected methodologies (hereinafter referred to as "any other standards, methodologies, methodological tools and guidelines (to be) applied in accordance with the

selected/applied methodologies” are collectively referred to as the other applied methodological regulatory documents);

- (d) Assess the accuracy, conservativeness, relevance, completeness, consistency and transparency of the information provided by the activity participants;<sup>7</sup>
- (e) Determine whether information provided by the activity participants is reliable and credible;<sup>8</sup>
- (f) Apply consistent validation/verification criteria to:
  - (i) The requirements of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents throughout the programme of activities (PoA) period(s) or the crediting period(s);
  - (ii) A6.4 PoAs with similar characteristics such as a similar application of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents, use of technology, time period or region;
  - (iii) Expert judgements, over time and among A6.4 PoAs or CPs;
- (g) Base its findings and conclusions on objective evidence and conduct all validation or verification activities in accordance with Article 6.4 mechanism rules and procedures;
- (h) Not omit evidence that is likely to alter the validation or verification opinion;
- (i) Present information in the validation report or verification and certification report in a factual, neutral and coherent manner and document all assumptions, provide references to background material, and identify changes made to the documentation;
- (j) Safeguard the confidentiality of all information obtained or created during the validation or verification;
- (k) Conduct a thorough and independent assessment against the applicable Article 6.4 mechanism rules and requirements.

## **5.2. Use of and compliance with applicable standards**

17. In carrying out its validation and verification work, the DOE shall use and determine the compliance with the valid version of applicable standards, methodologies, standardized baselines, methodological tools, A6.4 SD Tool, guidelines and other regulatory documents adopted by the CMA or the Supervisory Body.

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<sup>7</sup> Principles for each can be found in the activity standard.

<sup>8</sup> Information is credible if it is authentic and is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence. Information is reliable if the quality of evidence is accurate, credible and able to yield the same results on a repeated basis.

### **5.3. Use of applicable forms**

18. The DOE shall determine whether the activity participants completed the valid version of the relevant forms by following the instructions therein.
19. The DOE contracted to conduct validation for registration of a proposed A6.4 PoA, post-registration changes or renewal of the PoA period of a registered A6.4 PoA, as well as validation for the equivalent processes for CPs, shall prepare a validation report using the valid version of the relevant validation report form<sup>9</sup> and following the instructions therein.
20. The DOE contracted to conduct verification and certification of the implementation of the registered A6.4 PoAs and monitored GHG emission reductions or net GHG removals shall prepare a verification and certification report using the valid version of the relevant verification and certification report form<sup>10</sup> and following the instructions therein.

### **5.4. Use of applicable global warming potentials**

21. The DOE shall determine whether the global warming potentials (GWPs) were correctly applied in the programme of activities design document (PoA-DD), the component project design document (CP-DD) and in the monitoring report in accordance with relevant requirements in the activity standard.

## **6. Validation for registration of programmes of activities**

### **6.1. General requirements**

#### **6.1.1. Overarching requirement**

22. The DOE shall determine whether the proposed A6.4 PoA complies with all relevant requirements in the activity standard for registration of the PoA under the Article 6.4 mechanism.

#### **6.1.2. Standard auditing techniques**

23. The DOE shall assess the information provided by the activity participants.
24. In assessing the information, the DOE shall apply the means of validation specified throughout this standard and, where appropriate, standard auditing techniques, including, but not limited to:
  - (a) Document review, involving:
    - (i) A review of data and information;
    - (ii) Cross-checks between the information provided in the PoA-DD and information from sources other than those used to determine whether the information in the PoA-DD is reliable; if available, the DOE's sectoral or local expertise; and, if necessary, independent background investigations;

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<sup>9</sup> All types of validation report forms are available on the UNFCCC website.

<sup>10</sup> All types of verification and certification report forms are available on the UNFCCC website.

- (b) Follow-up actions (e.g. on-site inspection and telephone or e-mail interviews), including:
    - (i) Interviews with relevant stakeholders in the host country, such as personnel with knowledge of the A6.4 PoA design and implementation;
    - (ii) Cross-checks between the information provided by interviewed personnel (i.e. by checking sources or other interviews) to ensure that no relevant information has been omitted;
  - (c) Reference to available information relating to programmes, projects or technologies similar to the proposed A6.4 PoA or CP under validation;
  - (d) Review, based on the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations;
  - (e) Sampling approach in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.
25. It is optional for the DOE to conduct an on-site inspection for validation for the registration of a proposed A6.4 PoA. If the DOE conducts an on-site inspection, it does not necessarily need to include a visit to the geographical locations where CPs will be or are being implemented, but the inspection could be to the office of the representative activity participants. If the DOE does not conduct an on-site inspection as a means of validation, it shall describe the alternative means used and justify that they are sufficient for the purpose of validation.
26. Where no specific means of validation are specified, the DOE shall apply the standard auditing techniques described in paragraph 24 above.

### **6.1.3. Corrective action requests, clarification requests and forward action requests**

27. If the DOE identifies issues that require further elaboration, research or expansion in order to determine whether the proposed A6.4 PoA meets the relevant Article 6.4 mechanism rules and requirements, the DOE shall ensure that these issues are accurately identified, formulated, discussed and concluded in the validation report.
28. The DOE shall raise a corrective action request (CAR) if one or more of the following situations occurs:
- (a) Mistakes have been made by the activity participants that will influence the ability of the proposed A6.4 PoA to achieve real, measurable, verifiable and additional GHG emission reductions or net GHG removals;
  - (b) The applicable Article 6.4 mechanism rules and requirements have not been met; or
  - (c) There is a risk that GHG emission reductions or net GHG removals cannot be monitored or calculated.
29. The DOE shall raise a clarification request (CL) if the information provided by the activity participants is insufficient or not clear enough to determine whether the applicable Article 6.4 mechanism rules and requirements have been met.

30. The DOE shall raise a forward action request (FAR) if issues related to programme implementation that require review during the first verification after the validation of the proposed A6.4 PoA are identified. The DOE shall not raise a FAR that relates to the Article 6.4 mechanism rules and requirements for registration of the PoA.
31. The DOE shall resolve or “close out” CARs and CLs only if the activity participants rectify the PoA design and/or the PoA-DD, or provide additional explanations or evidence that satisfy the DOE’s concerns. If this is not done, the DOE shall not submit a request for registration of the proposed A6.4 PoA.
32. The DOE shall report on all CARs, CLs and FARs in its validation report. This reporting shall explain the issues raised, the responses provided by the activity participants, the means of validation of such responses, and references to any resulting changes in the PoA-DD or its supporting documents.

## **6.2. Validation of compliance with specific requirements for registration**

### **6.2.1. General**

33. The DOE shall determine, by following the general validation requirements referred to in sections 5 and 6.1 above, whether the proposed A6.4 PoA complies with all relevant requirements for registration as contained in the activity standard, including the requirements on:
  - (a) Notification of prior consideration of the Article 6.4 mechanism;
  - (b) Compliance with the host Party’s indication of activity types that it would approve;
  - (c) Description of the PoA;
  - (d) Avoidance of double or revived registration;
  - (e) Management system;
  - (f) Global stakeholder consultation;
  - (g) Demonstration of additionality;
  - (h) Start date and duration;
  - (i) Integrity safeguards;
  - (j) Approval of the PoA by the host Party;
  - (k) Authorization of activity participants by the host Party and other participating Parties;
  - (l) Modalities of Communication (MoC) statement;
34. When validating the compliance of the proposed A6.4 PoA with the requirements for registration referred to in paragraph 33 above, the DOE shall additionally follow the specific guidance on validation regarding some of these requirements provided in sections 6.2.2–6.2.13 below.

**6.2.2. Notification of prior consideration of the Article 6.4 mechanism**

35. The DOE shall determine whether the activity participants have notified the prior consideration of the Article 6.4 mechanism for the PoA in accordance with the respective requirements of the activity standard and in accordance with the “Article 6.4 activity cycle procedure for programmes of activities” (hereinafter referred to as the activity cycle procedure).

**6.2.3. Compliance with the host Party’s indication of activity types**

36. The DOE shall determine whether the activity types envisaged in the proposed A6.4 PoA fall within the scope of the activity types that the host Party has indicated publicly to the Supervisory Body that it would consider approving in accordance with the activity cycle procedure pursuant to paragraph 26(e) of the RMPs.

**6.2.4. Description of programme of activities**

37. The DOE shall assess the PoA-DD submitted by the activity participants and shall confirm:
- (a) The title and the UNFCCC reference number of the A6.4 PoA is consistent with those indicated in, and assigned to, the prior consideration notification for the PoA;
  - (b) The sectoral scopes are linked to the methodologies applied and relevant to the A6.4 PoA;
  - (c) The purpose and a general description of the A6.4 PoA, including:
    - (i) The policy/measure or stated goal that the A6.4 PoA seeks to achieve;
    - (ii) A framework for the implementation of the A6.4 PoA and inclusion of CPs in the PoA;
  - (d) The physical/geographical boundary(ies) of the A6.4 PoA in terms of geographical area (e.g. municipality(ies), region(s) within a country, country or several countries) within which all CPs to be included in the PoA will be implemented;
  - (e) Whether a generic CP-DD part of the PoA-DD (hereinafter referred to as generic CP-DD) has been prepared for each technology/measure, each methodology and each combination thereof, or whether technologies/measures have been combined in one generic CP-DD in accordance with the relevant requirements in the activity standard;
  - (f) Whether the description of the proposed A6.4 PoA in the PoA-DD is accurate and complete and whether it provides an understanding of the PoA including on technologies/measures to be deployed and/or implemented by the CPs under the PoA;
  - (g) Whether the PoA-DD stipulates the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by CPs that may be included in the PoA for each host Party of the PoA.
38. The DOE shall:
- (a) Describe the process undertaken to validate the accuracy and completeness of the description in the PoA-DD;

- (b) State its opinion on the accuracy and completeness of the description in the PoA-DD.

#### **6.2.5. Avoidance of double or revived registration**

- 39. The DOE shall determine the compliance with the requirements relating to double or revived registration of the proposed A6.4 PoA contained in the activity standard based on the publicly available information and/or the information provided by the activity participants upon its request.

#### **6.2.6. Management system**

- 40. The DOE shall assess and state its opinion on whether the management system for the proposed A6.4 PoA described in the PoA-DD is in accordance with the activity standard.

#### **6.2.7. Global stakeholder consultation**

- 41. The DOE shall determine whether authentic and relevant comments submitted in the global stakeholder consultation and published on the UNFCCC website in accordance with the activity cycle procedure have been taken into due account in the PoA-DD of the proposed A6.4 PoA.
- 42. The DOE shall determine whether changes to the PoA-DD have been made after the publication of the PoA-DD for global stakeholder consultation.
- 43. The DOE shall request the activity participants to make the revised PoA-DD publicly available for global stakeholder consultation in accordance with the activity cycle procedure if it determines that:
  - (a) The activity participants that have a contractual relationship with the DOE have been replaced;
  - (b) Significant changes have been made to the A6.4 PoA design; or
  - (c) The selected methodologies, the selected standardized baselines and/or the combination thereof have been changed by the activity participants, unless the change only involves the removal and no addition of methodologies and/or standardized baselines, and the removal of the methodologies and/or the standardized baselines does not affect the physical design of, and the end-use services provided by, CPs corresponding to the generic CPs that apply the methodologies and the standardized baselines that remain (i.e. the methodologies and, where applicable, the standardized baselines that were not removed).
- 44. If the DOE determines that significant changes have been made to the A6.4 PoA design, the DOE may seek guidance from the Supervisory Body on whether the revised PoA-DD shall be published for global stakeholder consultation in accordance with the activity cycle procedure.
- 45. If the DOE identifies changes to the PoA-DD after its publication for global stakeholder consultation, the DOE shall state its opinion on whether the publication of the revised PoA-DD for global stakeholder consultation was necessary in accordance with paragraphs 43 and 44 above.

#### **6.2.8. Demonstration of additionality**

46. The DOE shall assess and state its opinion on whether the PoA-DD includes conditions for systematically demonstrating additionality of CPs under the proposed A6.4 PoA in the eligibility criteria for inclusion of CPs in the PoA in accordance with the activity standard.

#### **6.2.9. Start date and duration**

47. The DOE shall determine whether the start date and duration of a proposed A6.4 PoA comply with the relevant provisions in the activity standard.
48. The DOE shall confirm the start date of the A6.4 PoA period as the earlier of the dates stated in the notification of prior consideration of the Article 6.4 mechanism submitted to the secretariat or the date of publication of the PoA-DD for global stakeholder consultation in accordance with the activity cycle procedure.
49. The DOE shall determine whether the start date of the PoA period is on or after 1 January 2021 and whether it has been determined in accordance with the relevant requirements of the activity standard.
50. The DOE shall confirm that the total duration of the proposed A6.4 PoA as specified in the PoA-DD does not exceed 20 years (60 years for the proposed activities involving removals).
51. The DOE shall describe the steps taken to assess and state its opinion on the compliance of the start date and duration of the proposed A6.4 PoA specified in the PoA-DD with the relevant requirements in the activity standard.

#### **6.2.10. Integrity safeguards**

52. The DOE shall determine whether the activity participants included a declaration that the development, implementation or operation of the proposed A6.4 PoA does not involve any illegal activities, including money laundering, tax evasion, fraud, bribery and criminal activities throughout the lifetime of the PoA, including the development, implementation and operation of CPs that may be included in the PoA.

#### **6.2.11. Approval of the PoA by the host Party**

53. The DOE shall determine whether the designated national authority (DNA) of the host Party of the proposed A6.4 PoA has provided an approval of the proposed PoA to the Supervisory Body through the dedicated interface on the UNFCCC website in accordance with the activity cycle procedure.
54. For a multi-country hosted proposed A6.4 PoA, the DOE shall determine whether the DNAs of all host Parties have provided an approval of the proposed PoA.

#### **6.2.12. Authorization of activity participants by the host Party and other participating Parties**

55. The DOE shall determine whether each activity participant of the proposed A6.4 PoA listed in the PoA-DD has been authorized to participate in the PoA by the host Party or other participating Party, if applicable, through the dedicated interface on the UNFCCC website in accordance with the activity cycle procedure.



56. The DOE shall confirm that the activity participants of the proposed A6.4 PoA are listed in the PoA-DD and that this information is consistent with the information provided in the section that contains the contact information of the activity participants.
57. The DOE shall confirm that no entities other than those authorized as the activity participants of the proposed A6.4 PoA are included in these sections of the PoA-DD.
58. The DOE shall, for each activity participant of the proposed A6.4 PoA, describe the means of validation used to support the conclusions.

#### **6.2.13. Modalities of communication statement**

59. The DOE shall validate the corporate identity of all activity participants included in the MoC statement, as well as the personal identities, including specimen signatures and employment status, of their authorized signatories.
60. The DOE shall validate the identities referred to in paragraph 59 above through:
  - (a) Directly checking evidence of corporate and personal identities and other relevant documentation;
  - (b) Notarized documentation; or
  - (c) Written confirmation from the activity participants that submit the MoC statement that all corporate and personal details, including specimen signatures, are valid and accurate.
61. When the DOE validates the identities by applying paragraph 60(c) above, the DOE shall ensure that the official who submits the MoC statement to the DOE and the official who signed the written confirmation (if a different person) are duly authorized to do so on behalf of the activity participants.
62. If the DOE is unable to validate the requirements by applying paragraph 60(a), (b) or (c) above, the DOE may perform further validation activities in order to confirm that the corporate and personal details, employment status and specimen signatures included in the MoC statement are valid and accurate, and comply with the requirements in this section.
63. The DOE shall state that it has performed due diligence on the MoC statement in accordance with the requirements in this section.
64. The DOE shall validate that the MoC statement has been correctly completed and duly authorized.
65. The DOE shall check that:
  - (a) The valid version of the “Modalities of Communication statement form” has been used;
  - (b) The information required as per the Modalities of Communication statement form, including its annexes, is correctly completed;
  - (c) The activity participants’ authorized signatories signing the Modalities of Communication statement form correspond to the activity participants’ authorized signatories included in the Modalities of Communication statement form.

66. The DOE shall state that the MoC statement was completed and duly authorized in accordance with the valid version of the form and the information required therein.

### **6.3. Generic component project**

#### **6.3.1. General description of generic component project**

67. The DOE shall determine whether the description of the generic CP(s) in the PoA-DD is accurate, and complete, and provides an understanding of the generic CP(s).
68. The DOE shall determine whether the description of the generic CP(s) in the PoA-DD is in compliance with the requirements of the activity standard.
69. The DOE shall:
- (a) Describe the process undertaken to validate the accuracy and completeness of the description of the generic CP(s);
  - (b) Provide an opinion on the accuracy and completeness of the description of the generic CP(s).

#### **6.3.2. Selection of methodologies and standardized baselines**

##### **6.3.2.1. General**

70. The DOE shall determine whether selected methodologies, standardized baselines and any other standards, methodologies, methodological tools and guidelines, approved by the Supervisory Body, that have been applied by the activity participants are valid,<sup>11</sup> applicable to the generic CP and, if applicable, are in compliance with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs.
71. The DOE shall determine whether the design of the generic CP complies with all the requirements of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents and, if applicable, the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs.
72. The DOE or the activity participants may submit a proposed new methodology in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" if there is no available methodology that can be applied to the proposed A6.4 PoA.

##### **6.3.2.2. Deviation from or revision of methodologies and/or methodological tools**

73. The DOE may seek clarification from the Supervisory Body on the acceptability of a deviation from a selected approved methodology, methodological tool or any other applied methodological regulatory document in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" prior to the

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<sup>11</sup> The valid version of a methodology is its latest version, or a previous version if the submission of the request for registration of the proposed A6.4 PoA to the secretariat, in accordance with the activity cycle procedure, is still within the grace period of the previous version for use in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools".

submission of a request for registration or publication of the PoA-DD for global stakeholder consultation (GSC), if the DOE, when performing validation for the proposed A6.4 PoA, or upon request from the activity participants before the publication of the PoA-DD for GSC, finds that, due to a PoA-specific<sup>12</sup> issue implying that a revision of the methodology and/or methodological tool would not be required to address the issue, the activity participants deviated from:

- (a) The selected methodology, methodological tool or any other applied methodological regulatory document; or
- (b) Sections in the selected methodology, methodological tool or any other applied methodological regulatory document that are not standardized by the selected standardized baselines, if the proposed generic CP applies standardized baselines.

74. Alternatively, if the DOE considers that a revision of the selected methodology, methodological tool or any other applied methodological regulatory document would be required to address the programme situation, the DOE shall submit, or request the activity participants to submit, a request for revision in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools".

#### **6.3.2.3. Clarification on applicability of methodologies and/or methodological tools and/or standardized baseline**

75. If the DOE cannot determine the applicability of a selected methodology, methodological tool and/or standardized baseline to the proposed generic CP, the DOE shall request a clarification on the applicability in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" and/or the "Procedure: Development, revision, clarification and update of standardized baselines". The DOE shall conduct an assessment to ensure that the request is not submitted with the intention of revising the selected methodology, methodological tool and/or standardized baseline to expand their applicability.

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<sup>12</sup> Examples of PoA-specific issues include, but are not limited to, the following:

- (a) The methodology requires measurements using instrumentation of certain specifications or using a certain method. The activity participants of the proposed PoA identify a difficulty in acquiring the specified instrumentation or difficulty in implementing the measurement method; however, they can achieve comparable accuracy of measured parameters using an alternative instrumentation or measurement method;
- (b) A proposed CP does not have access to the data sources specified by the methodology for a certain parameter; a different source of data can be accessed by the CP to estimate the parameter with equal reliability and accuracy;
- (c) A minor deviation is sought for a PoA-specific situation, which is well justified and conservative. For example: a methodology requires limiting production in the project scenario between +/- 5% of rated capacity, if the historical baseline is to be applied. Due to government restrictions, the plant has never been operated at its rated capacity but at a capacity which is much below its rated capacity (20% below the rated capacity). A deviation can be presented specifying conservative approaches to calculate the emission reduction in such a PoA-specific case;
- (d) A conservative estimation technique or default factor suggested addressing uncertainties related to programme-specific situations, which are not addressed in the methodology. For example, a well-justified conservative uncertainty factor proposed to be used in equations of baseline emissions to address uncertainties in the real-life situation during the crediting period.

### **6.3.3. Application of methodologies and standardized baselines**

#### **6.3.3.1. General**

76. The DOE shall validate that the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are applicable to the design of the proposed generic CP and that the selected versions are valid at the time of submission of the proposed A6.4 PoA for registration and, if applicable, are in compliance with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs.
77. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents were correctly applied with respect to the following:
  - (a) Applicability conditions;
  - (b) Project boundary;
  - (c) Baseline identification;
  - (d) Algorithms and/or formulae used to determine emission reductions;
  - (e) Additionality;
  - (f) Monitoring methodology.
78. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are correctly quoted and applied by comparing them with the actual text of the valid version of these documents, and relevant requirements in the activity standard.
79. If the generic CP applies a previous version of a methodology or a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted after the grace period for applying the previous version in accordance with the validity section of the "Procedure: Development, revision and clarification of methodologies and methodological tools", the DOE shall request the activity participants to provide a revised PoA-DD, applying the latest version of the methodology or other applicable and valid methodology, or the standardized baseline in accordance with the activity standard.
80. If the generic CP does not apply a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted after an applicable approved standardized baseline whose selection is mandatory has become valid and after the grace period for not applying the standardized baseline in accordance with the validity section of the "Procedure: Development, revision, clarification and update of standardized baselines", the DOE shall request the activity participants to provide a revised PoA-DD, applying the standardized baseline in accordance with the activity standard.
81. The DOE shall determine whether the generic CP meets all the applicability conditions of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents. This shall be undertaken by validating the documentation referred to in the PoA-DD and by verifying that the documentation content is correctly quoted and interpreted in the PoA-DD. If the DOE, based on local and sectoral knowledge, is aware that comparable information is available from credible sources other than those used in the PoA-DD, then the DOE shall cross-check the PoA-DD against such

other sources to confirm that the generic CP meets the applicability conditions of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents.

82. For each applicability condition listed in the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents, the DOE shall describe the steps taken to assess the relevant information contained in the PoA-DD against these criteria. The DOE shall state its opinion regarding the applicability of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents to the proposed generic CP.
83. If the generic CP applies multiple methodologies, the DOE shall assess and state its opinion on whether the methodologies were applied in accordance with the activity standard.

#### **6.3.3.2. Project boundary, sources and greenhouse gases**

84. The DOE shall determine whether the description of how to define the project boundary of each of the corresponding CPs, including which sources and GHGs are to be included in the project boundary under which conditions or circumstances, is in accordance with the applied methodologies and the applied standardized baselines.
85. The DOE shall confirm that the description of defining the project boundary is based on documented evidence and, where conducted, an on-site inspection.
86. If the applied methodologies or the applied standardized baselines allow the activity participants to choose whether a GHG source or gas is to be included within the project boundary, the DOE shall determine whether the activity participants have justified that choice. The DOE shall determine whether the justification provided is reasonable, based on an assessment of supporting documented evidence provided by the activity participants and corroborated by observations if required.
87. The DOE shall describe how the validation of the project boundary has been performed by detailing the documentation assessed (e.g. a commissioning report) and, where conducted, by describing its observations during any on-site inspection (i.e. observations of the physical site or equipment used in the process).
88. The DOE shall state whether the description of how to define the project boundary of each of the corresponding CPs and the selected GHG sources and gases are justified for the generic CP. Should the DOE identify GHG emission sources that will be affected by the implementation of corresponding CPs and which are expected to contribute more than 1 per cent of the overall expected average annual GHG emission reductions or net GHG removals, and are not addressed by the applied methodologies or the applied standardized baselines, the DOE shall request a clarification of, revision to, or clarification for acceptance of deviation from the methodologies or the standardized baselines in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" or the "Procedure: Development, revision, clarification and update of standardized baselines" as applicable.

#### **6.3.3.3. Baseline scenario**

89. The DOE shall determine whether the description of how to establish the baseline scenario for each of the corresponding CPs is in accordance with the applied methodologies, an approved standardized baseline that standardizes the baseline scenario, other applied

methodological regulatory documents and, where applicable, the baseline approaches specified by the host Party in accordance with paragraph 27(a) of the RMPs. The DOE shall assess whether a more ambitious baseline requirement, as determined by the host Party and approved by the Supervisory Body, has been applied in the identification of the most plausible baseline scenario, if applicable.

90. The DOE shall determine whether the description of how to establish the baseline scenario in the case where it is foreseen that the future anthropogenic emissions by sources are projected to rise above current levels due to the specific circumstances of the host Party complies with guidance on suppressed demand in the applied methodology.
91. The DOE shall describe whether the description of the identification of the baseline scenario in the generic CP-DD is in accordance with the selected standardized baseline if the generic CP uses an approved standardized baseline that standardizes the baseline scenario.
92. If the applied methodologies require several alternative scenarios to be considered in the identification of the most plausible baseline scenario, the DOE shall, based on financial expertise and local and sectoral knowledge, determine whether all scenarios that are considered by the activity participants and any scenarios that are supplementary to those required by the methodologies, are realistic and credible in the context of the generic CP and that no alternative scenario has been excluded.
93. The DOE shall determine whether any procedure contained in the applied methodologies, methodological tool or other methodological regulatory documents to identify the most reasonable baseline scenario has been correctly applied.
94. The DOE shall determine whether the identification of the most plausible baseline scenario is reasonable by validating the assumptions, calculations and rationales used in the generic CP-DD. It shall determine whether the documents and sources referred to in the generic CP-DD are correctly quoted and interpreted. The DOE shall cross-check the information provided in the generic CP-DD with other verifiable and credible sources, such as local expert opinion, if available.
95. The DOE shall determine whether the generic CP-DD provides a description of the technology that would be deployed and/or the activities that would take place in the absence of each of the corresponding CPs.
96. The DOE shall describe the steps taken to assess the requirements and state its opinion on whether:
  - (a) All the assumptions and data used by the activity participants are listed in the generic CP-DD, including their references and sources;
  - (b) All documentation used is relevant for establishing the baseline scenario and correctly quoted and interpreted in the generic CP-DD;
  - (c) Assumptions and data used in the identification of the baseline scenario are justified appropriately, supported by evidence, and can be deemed reasonable;
  - (d) Relevant national and/or sectoral policies, regulations and circumstances are considered and listed in the generic CP-DD;

- (e) The applied methodologies have been correctly followed to describe the identification of the most plausible baseline scenario, and the description reasonably represents what would occur in the absence of corresponding CPs.

97. The DOE shall describe other steps taken and sources of information used to cross-check the information contained in the generic CP-DD.

#### **6.3.3.4. Business-as-usual scenario or benchmark**

98. The DOE shall assess whether, in the generic CP-DD, the identification and the description of the business-as-usual (hereinafter referred as BAU) scenario or reference benchmark emissions comply with the requirements of the activity standard, applied methodologies and other applied methodological regulatory documents.

#### **6.3.3.5. Estimation of emission reductions or net removals**

99. The DOE shall determine whether the description of how to undertake the ex ante and ex post calculations of baseline, BAU, project and leakage GHG emissions or removals, as well as GHG emission reductions or net GHG removals, to be achieved by each of the corresponding CPs are in accordance with the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents and, where applicable, the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.

100. Where the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents allow for selection between options for equations or parameters, the DOE shall determine whether adequate justification has been provided (based on the choice of the baseline scenario, context of the proposed generic CP and other evidence provided) and that the correct equations and parameters have been used, in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.

101. The DOE shall verify the justification given in the generic CP-DD for the choice of data and parameters used in the equations, as follows:

- (a) **Data and parameters fixed ex ante:** If data and parameters will not be monitored throughout the crediting periods of corresponding CPs but will be determined prior to their inclusion in the proposed A6.4 PoA individually for each CP and will remain fixed throughout the crediting periods, the DOE shall determine whether the identification of all data sources and assumptions are appropriate and applicable to the generic CP, and will result in an accurate or otherwise conservative estimate of GHG emission reductions or net GHG removals. If the applied methodologies require that any of these data and parameters be determined in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body, the DOE shall determine whether the generic CP-DD states the necessity of conducting such sampling in accordance with this standard;
- (b) **Data and parameters to be monitored:** If data and parameters will be monitored or estimated on implementation of corresponding CPs and hence become available only after the inclusion of corresponding CPs, the DOE shall determine whether the modalities for estimation of these data and parameters provided in the generic CP-DD are reasonable. If the applied methodologies require that any of these estimates be determined in accordance with the standard for sampling and

surveys for A6.4 activities to be developed by the Supervisory Body, the DOE shall determine whether the generic CP-DD states the necessity of conducting such sampling in accordance with this standard.

102. For projects involving removals that also result in emission reductions, the DOE shall assess whether the estimation of removals and emission reductions is separated and that it was undertaken in accordance with the applied methodology(ies) applicable to the generic CP.
103. The DOE shall determine whether, in the generic CP-DD, the steps taken to calculate the difference between baseline emissions and BAU emissions for each year of the crediting period and the total amount over the crediting period to determine a downward adjustment based on BAU are in compliance with relevant provisions of the activity standard, the methodologies standard, applied methodologies and other applied methodological regulatory documents.
104. The DOE shall assess whether the approach to determining whether the baseline shall be adjusted downward, was applied in compliance with the requirements of the activity standard, respective provisions of the methodologies standard, applied methodologies and other applied methodological regulatory documents.
105. The DOE shall determine whether the approach to determine leakage emissions in the generic CP-DD is in accordance with activity standard and relevant applied methodologies and other applied methodological regulatory documents.
106. The DOE shall also assess whether the approaches for avoiding or minimizing and accounting for leakage emissions are in line with the respective requirements of the activity standard, applied methodologies and other applied methodological regulatory documents.
107. The DOE shall describe the steps taken to assess the requirements and state its opinion on whether:
  - (a) All assumptions and data used by the activity participants are listed in the generic CP-DD, including their references and sources;
  - (b) All documentation used by the activity participants as the basis for assumptions and sources of data are correctly quoted and interpreted in the generic CP-DD;
  - (c) All values used in the generic CP-DD, including GWPs, are considered reasonable in the context of the generic CP;
  - (d) The methodologies, standardized baselines and other methodological regulatory documents have been applied correctly to describe how to calculate baseline, project and leakage GHG emissions as well as GHG emission reductions or net GHG removals for corresponding CPs;
  - (e) Modalities to estimate the baseline GHG emissions or GHG removals can be replicated using the data and parameter values provided in the generic CP-DD;
  - (f) The necessity of conducting sampling in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body is stated, where the applied methodologies require that the data and parameters be determined in accordance with this standard.



108. The DOE shall describe how it has verified the data and parameters used in the equations, including references to any other data sources used.

#### **6.3.3.6. Validation of the monitoring plan**

109. The DOE shall determine whether the description of how to develop a monitoring plan for each of the corresponding CPs complies with the requirements of the activity standard, the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents and, where applicable, the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.
110. The DOE shall apply the following three-step process to meet the above requirement:
- (a) To assess the compliance of the description of how to develop a monitoring plan with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, the DOE shall:
    - (i) Identify the list of parameters required by the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents by means of document review;
    - (ii) Confirm that the description of how to develop a monitoring plan contains all necessary parameters and that the means of monitoring described in the monitoring plan comply with the requirements of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
  - (b) To assess the feasibility of the modalities to develop a monitoring plan, the DOE shall, by means of review of the documented procedures, interviews with relevant personnel, project plans and, where conducted, any on-site inspection of the proposed A6.4 PoA, assess whether:
    - (i) The monitoring arrangements described in the monitoring plan are feasible within the project design of the generic CP;
    - (ii) The means of implementation of the monitoring plan, including the data management and quality assurance and quality control procedures, are sufficient to ensure that GHG emission reductions or net GHG removals that will be achieved by corresponding CPs can be reported ex post and verified;
  - (c) To determine whether the modalities to develop a sampling plan provide parameter value estimates in an unbiased and reliable manner, where the activity participants applied a sampling approach to determining data and parameters, the DOE shall assess the proposed sampling plan in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.
111. The DOE shall:
- (a) State its opinion on the compliance of the description of how to develop a monitoring plan with the requirements of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents and, where applicable, the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body;

- (b) Describe the steps undertaken to assess whether the description on how to make the monitoring arrangements are feasible within the project design;
- (c) State its opinion on the activity participants' ability to implement the monitoring plans for corresponding CPs.

#### **6.3.3.7. Crediting period type and duration**

112. The DOE shall determine whether the activity participants defined the type and duration of the crediting period applicable to all corresponding CPs in accordance with the relevant requirements in the activity standard.

#### **6.3.3.8. Eligibility criteria for inclusion of component projects**

113. The DOE shall assess whether the eligibility criteria for inclusion of corresponding CPs in the proposed A6.4 PoA are defined in accordance with the activity standard.
114. The DOE shall assess how each eligibility criterion, including the conditions that corresponding CPs meet the requirement pertaining to the demonstration of additionality, is defined in accordance with the applicable requirements in the activity standard, and is verifiable as well as sufficiently objective and comprehensive to permit the assessment of the inclusion of corresponding CPs in the proposed A6.4 PoA.

### **6.4. Validation status, outcomes, opinion and report**

#### **6.4.1. Validation opinion**

115. The DOE shall include a statement on the likelihood of the proposed A6.4 PoA achieving the anticipated level of GHG emission reductions or net GHG removals by each corresponding CP for each generic CP.
116. The DOE shall provide either:
- (a) A positive validation opinion in its validation report if the DOE determines that the proposed A6.4 PoA complies with the applicable Article 6.4 mechanism rules and requirements; or
  - (b) A negative validation opinion in its validation report explaining the reason for its opinion if the DOE determines that the proposed A6.4 PoA does not fulfil the applicable Article 6.4 mechanism rules and requirements.
117. The DOE shall include the following in its opinion:
- (a) A summary of the validation method and process used and the validation criteria applied;
  - (b) A description of issues not covered by the validation process;
  - (c) A confirmation of the maximum annual amount of GHG emission reductions or net GHG removals that may be achieved by the proposed A6.4 PoA;
  - (d) A summary of the validation conclusions;
  - (e) A statement on whether the proposed A6.4 PoA meets all applicable Article 6.4 mechanism rules and requirements.

118. The DOE shall notify the activity participants of the validation outcome. The notification to the activity participants shall include either:

- (a) A confirmation of successful validation and date of submission of the validation report as part of the request for registration of the proposed A6.4 PoA to the Supervisory Body; or
- (b) Reasons for unsuccessful validation if the proposed A6.4 PoA, as documented, is determined not to fulfil the requirements for validation.

#### **6.4.2. Validation report**

119. The DOE shall report the results of its assessment in the validation report.

120. In its validation report, the DOE shall provide the following:

- (a) An executive summary of the validation process and its conclusions;
- (b) Details of the validation team, technical experts and internal technical reviewers involved, together with their roles in the validation activity and, where conducted, details of who conducted the on-site inspection;
- (c) A list of interviewees, documents reviewed, sampling approaches used by the DOE and, where conducted, an outline of on-site inspections. Where the DOE applied a sampling approach to the on-site inspection, the DOE shall include a description of how the sample size was determined and how the field check was carried out;
- (d) Results of the dialogue between the DOE and the activity participants, as well as any adjustments made to the PoA design following the stakeholder consultation;
- (e) The applied approach, findings and conclusion in the assessment of compliance with each requirement for registration, including CARs, CLs or FARs issued to the activity participants. The DOE shall reflect the responses to CARs and CLs, identification of FARs, and discussions on and revisions to the programme documentation;
- (f) Information on quality control within the team and in the validation process;
- (g) All its applied approaches, findings and conclusions on:
  - (i) The completion of the PoA-DD, using the valid version of the applicable form and following instructions herein;
  - (ii) The requirements set out in sections 6.2–6.4 above;
- (h) A validation opinion;
- (i) Appointment certificates or curricula vitae of the DOE's validation team members, technical experts and internal technical reviewers for the proposed A6.4 PoA.

## **7. Validation for inclusion of component projects**

### **7.1. General validation requirements**

121. The DOE contracted by the activity participants to validate a proposed CP for inclusion in a registered A6.4 PoA shall be accredited for the validation function and in the sectoral scope(s) relevant to the CP.
122. The DOE shall apply the objectives, approach and means of validation in section 6.1 above, mutatis mutandis, when validating a proposed CP for inclusion in a registered A6.4 PoA.
123. The DOE shall assess whether the proposed CP complies with the corresponding generic CP-DD in the latest version of the registered PoA-DD, including the eligibility criteria for the inclusion of CPs in the registered A6.4 PoA and relevant Article 6.4 mechanism rules and requirements.
124. If the activity participants have chosen to delay the submission of the monitoring plan for the proposed CP in accordance with the activity standard, the DOE shall confirm and document that the monitoring plan is delayed.
125. It is mandatory for the DOE to conduct an on-site inspection at validation for the proposed CP if:
  - (a) Its estimated annual average of GHG emission reductions or net GHG removals is more than 100,000 tonnes of carbon dioxide equivalent (t CO<sub>2</sub> eq); or
  - (b) There is pre-project information that is relevant to the requirements for inclusion of the CP in the registered A6.4 PoA and may not be traceable after the inclusion.
126. For cases that are not referred to in paragraph 125 above, it is optional for the DOE to conduct an on-site inspection at validation. If the DOE does not conduct an on-site inspection as a means of validation, it shall describe the alternative means used and justify that they are sufficient for the purpose of validation.

### **7.2. General description of component project**

127. The DOE shall assess the CP-DD submitted by the activity participants and confirm that the proposed CP has:
  - (a) Only one host Party;
  - (b) Its geographic reference or other means of identification;
  - (c) An entity(ies)/individual(s) responsible for the operation of the CP;
  - (d) Been neither registered as an A6.4 project nor included in another registered A6.4 PoA.
128. The DOE shall determine whether the description of the proposed CP in the CP-DD is accurate and complete, and provides an understanding of the proposed CP.
129. The DOE shall determine, by following the general validation requirements referred to in section 7.1 above, whether the proposed CP is consistent with the generic CP and

complies with all relevant requirements for inclusion in the registered A6.4 PoA as contained in the activity standard, including the requirements on:

- (a) The compliance with the host Party's indication of activity types that it would approve in accordance with paragraph 26(e) of the RMPs;
  - (b) The description of the CP;
  - (c) The avoidance of double or revived registration;
  - (d) The selection of methodologies and standardized baselines and their applicability to the CP;
  - (e) The deviation from, or revision of, the selected methodology or methodological tool, if applicable;
  - (f) The application of methodologies and standardized baselines, including in terms of:
    - (i) The applicability conditions;
    - (ii) The definition of the project boundary, identification of sources, sinks and GHGs included in the project boundary, and identification of leakage;
    - (iii) The identification of baseline scenario;
    - (iv) The demonstration of additionality;
    - (v) The assessment of the risk of non-permanence of GHG emission reductions or net GHG removals and measures to address reversals if they occur;
    - (vi) The estimation of GHG emission reductions or net GHG removals;
    - (vii) The monitoring plan;
  - (g) The specification of the start date, crediting period type and duration;
  - (h) The analysis of environmental impacts, social impacts and sustainable development impacts;
  - (i) Integrity safeguards;
  - (j) Local or subnational stakeholder consultation;
  - (k) The eligibility of inclusion.
130. When validating the compliance of the proposed CP with the requirements for inclusion in the registered A6.4 PoA referred to in paragraph 129 above, the DOE shall additionally follow the specific guidance on validation regarding some of these requirements provided in sections 7.3–7.12 below.

### **7.3. Compliance with the host Party's indication of activity types**

131. The DOE shall determine whether the proposed CP complies with the activity types that the host Party has indicated publicly to the Supervisory Body that it would consider approving pursuant to chapter V.C (Approval and authorization) of the RMPs and in accordance with the activity cycle procedure.

#### **7.4. Description of component project**

132. The DOE shall describe the process undertaken to validate the accuracy and completeness of the description of the proposed CP in the CP-DD and state its opinion on the accuracy and completeness of the description.

#### **7.5. Avoidance of double or revived registration**

133. The DOE shall determine the compliance with the requirement relating to double or revived registration contained in the activity standard based on the publicly available information and/or the information provided by the activity participants upon its request.

#### **7.6. Selection of methodologies and standardized baselines**

134. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are compatible with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs, if applicable.
135. If the DOE, based on local and sectoral knowledge, is aware that comparable information is available from credible sources other than those used in the CP-DD, it shall cross-check the CP-DD against such other sources to confirm that the proposed CP meets the applicability conditions of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents.
136. The DOE shall determine whether the proposed CP has selected the standardized baselines where their selection is mandatory.
137. If the DOE cannot determine the applicability of the selected methodology, methodological tool and/or standardized baseline to the proposed CP, the DOE shall request a clarification on the applicability in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" and/or the "Procedure: Development, revision, clarification and update of standardized baselines".

##### **7.6.1. Deviation from methodology or methodological tool**

138. The DOE may seek a clarification from the Supervisory Body on the acceptability of a deviation from the selected methodology or methodological tool in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" prior to the inclusion of the proposed CP, if the DOE, when performing validation for the inclusion of the CP in the registered A6.4 PoA, or upon request from the activity participants, finds that, due to a project-specific<sup>13</sup> issue implying that a revision of the

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<sup>13</sup> Examples of project-specific issues include, but are not limited to, the following:

- (a) The methodology requires measurements using instrumentation of certain specifications or using a certain method. The activity participants of the proposed CP face a difficulty in acquiring the specified instrumentation or a difficulty in implementing the measurement method; however, they can achieve comparable accuracy of measured parameters using an alternative instrumentation or measurement method;
- (b) A proposed CP does not have access to the data sources specified by the methodology for a certain parameter; a different source of data can be accessed by the CP to estimate the parameter with equal reliability and accuracy;

methodology and/or methodological tool would not be required to address the issue, the CP deviated from:

- (a) The selected methodology or methodological tool; or
  - (b) Sections in the selected methodology or methodological tool that are not standardized by the selected standardized baselines, if the proposed CP applies standardized baselines.
139. The DOE shall submit an assessment of the case including demonstration that the deviation does not require revision of the selected methodology or methodological tool, and shall include a description of the impact of the deviation on GHG emission reductions or net GHG removals by the CP.
140. Alternatively, if the DOE considers that a revision of the selected methodology or methodological tool would be required to address the project situation, then the DOE shall submit, or shall request the activity participants to submit, a request for revision of the selected methodology or methodological tool in accordance with the "Procedure: Development, revision and clarification of methodologies and methodological tools" and, upon its revision, proceed with a request for post-registration changes to the registered A6.4 PoA to apply the revised version.

## **7.7. Application of methodologies and standardized baselines**

### **7.7.1. Host Party methodological requirements**

141. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are applied in a way to comply with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs, if applicable.

### **7.7.2. Project boundary, sources, leakage and greenhouse gases**

142. If the applied methodologies and the applied standardized baselines allow the activity participants to choose whether a GHG source or gas is to be included within the project boundary, the DOE shall determine whether the activity participants have justified that choice and whether the justification provided is reasonable.
143. If the DOE identifies GHG emission sources that will be affected by the implementation of the CP and which are expected to contribute more than 1 per cent of the overall expected average annual GHG emission reductions or net GHG removals, and are not addressed by the applied methodologies or the applied standardized baselines, the DOE shall

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- (c) A minor deviation is sought for a project-specific situation, which is well justified and conservative. For example: a methodology requires limiting production in the project scenario between +/- 5 per cent of rated capacity, if the historical baseline is to be applied. Due to government restrictions, the plant has never been operated at its rated capacity but at a capacity which is much below its rated capacity (20 per cent below the rated capacity). A deviation can be presented specifying conservative approaches to calculate the emission reduction in such a project-specific case;
  - (d) A conservative estimation technique or default factor suggested addressing uncertainties related to project-specific situations, which are not addressed in the methodology, for example, a well-justified conservative uncertainty factor proposed to be used in equations of baseline emissions to address uncertainties in the real-life situation during the crediting period.

request a clarification of, revision to, or deviation from, the methodologies or the standardized baselines, as appropriate, in accordance with the “Procedure: Development, revision and clarification of methodologies and methodological tools” or the “Procedure: Development, revision, clarification and update of standardized baselines”.

#### **7.7.3. Baseline scenario**

144. If the applied methodologies require several alternative scenarios to be considered in the identification of the most plausible baseline scenario, the DOE shall, based on its expertise and local and sectoral knowledge, determine whether all scenarios that are considered by the activity participants and any scenarios that are supplementary to those required by the methodologies are realistic and credible in the context of the proposed CP and that no alternative scenario has been excluded. The DOE shall assess whether a more ambitious baseline requirement, as determined by the host Party and approved by the Supervisory Body, has been applied in the identification of the most plausible baseline scenario, if applicable.
145. The DOE shall determine whether the most plausible baseline scenario identified is reasonable by validating the assumptions, calculations and rationales used in the CP-DD.
146. Notwithstanding paragraphs 144 and 145 above, if the proposed CP applies an approved standardized baseline that standardizes the baseline scenario, the DOE shall determine whether the baseline scenario for the CP is the scenario specified by the applied standardized baseline.

#### **7.7.4. Business-as-usual scenario or benchmark**

147. The DOE shall assess whether the identification and the description in the CP-DD of the BAU scenario or reference benchmark emissions comply with the requirements of the activity standard, applied methodologies and other applied methodological regulatory documents.

#### **7.7.5. Demonstration of additionality**

148. The DOE shall determine whether the additionality of the proposed CP is demonstrated in accordance with the applied methodologies, the applied standardized baselines and the applied methodological tools for demonstration of additionality, if any, by verifying the reliability and credibility of all data used, and rationales, assumptions and justifications provided by the activity participants, and critically assessing the evidence presented, using local knowledge and sectoral and financial expertise.
149. Notwithstanding paragraph 148 above, if the proposed CP applies an approved standardized baseline that standardizes additionality, the DOE shall determine whether the project meets the additionality criteria in the applied standardized baseline.
150. The DOE shall determine if the proposed CP complies with all conditions of the eligibility criteria in the PoA-DD as per paragraph 33(g) above that ensure that the CP meets the requirements for demonstration of additionality.



**7.7.6. Addressing non-permanence for component projects involving removals and emission reduction component projects with reversal risks**

151. The DOE shall determine whether the risks of reversals were identified and assessed in compliance with requirements of the activity standard, provisions of the removals standard and other applied methodological regulatory documents.
152. The DOE shall determine whether the risk assessment was conducted in accordance with the applied methodologies and other applied methodological regulatory documents.
153. The DOE shall assess the reviewed and updated risk assessment of CPs included in the registered A6.4 PoA every five years from the start of the first crediting period and in any of the following circumstances:
  - (a) The DOE or the Supervisory Body identifies the need to revise the monitoring plan of a particular CP/(s) based on any concerns identified with the monitoring plan and the risk assessment plan;
  - (b) Additional risk factors are identified following a reversal in a particular CP/(s) that are not included or are not adequately addressed in the monitoring plan and the risk assessment plan;
  - (c) The applicable national or regional regulations require the consideration of risk factors that are not included or are not adequately assessed in the monitoring plan of a particular CP/(s) and the risk assessment plan.

**7.7.7. Estimation of emission reductions or net removals**

154. Where the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents allow for selection between options for equations or parameters, the DOE shall determine whether adequate justification has been provided (based on the choice of the baseline scenario, context of the CP and other evidence provided) and that the correct equations and parameters have been used, in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
155. For CPs involving removals that also result in emission reductions, the DOE shall assess whether the estimation of removals and emission reductions is separated and was undertaken in accordance with the applied methodology(ies).
156. The DOE shall determine whether the correct approaches were applied for the estimation of BAU emissions, baseline emissions, project emissions and leakage emissions in accordance with the relevant provisions of the activity standard and applied methodology(ies).
157. The DOE shall assess whether the difference between the baseline emissions and BAU emissions as an annual and total amount with respect to the crediting period was estimated correctly following the modalities contained in the generic CP-DD.
158. The DOE shall assess whether the downwards adjustment of the baseline, if applicable, was applied as per the modalities contained in the generic CP-DD and in compliance with the requirements of the activity standard, respective provisions of the methodologies standard, applied methodologies and other applied methodological regulatory documents.

159. The DOE shall determine whether the leakage emissions were identified, described and calculated in accordance with activity standard, relevant applied methodologies and other applied methodological regulatory documents.
160. The DOE shall also assess whether the leakage emissions are avoided or minimized and accounted for in line with the respective requirements of the activity standard, applied methodologies and other applied methodological regulatory documents.
161. The DOE shall describe the steps taken to assess whether:
- (a) The equations and parameters are applied to calculate GHG emission reductions or net GHG removals for the CP in accordance with the modalities in the corresponding generic CP;
  - (b) The data and parameters fixed ex ante are used in the equations to calculate GHG emission reductions or net GHG removals for the CP in accordance with the modalities in the corresponding generic CP;
  - (c) The methodologies and, where applicable, the standardized baselines and the other methodological regulatory documents are applied correctly to calculate baseline, project and leakage GHG emissions as well as GHG emission reductions or net GHG removals in accordance with the modalities in the corresponding generic CP;
  - (d) The ex ante estimates of baseline, project and leakage GHG emissions as well as GHG emission reductions or net GHG removals are provided, including whether the estimates can be replicated, in accordance with the modalities in the corresponding generic CP.

#### **7.7.8. Monitoring plan**

162. The DOE shall determine whether the monitoring plan is in accordance with the requirements of activity standard and has been developed in accordance with the description in the generic CP-DD of how to develop a monitoring plan and is feasible to implement, including the feasibility of the monitoring arrangements, and whether the means of implementation of the monitoring plan, including the data management and quality assurance and quality control procedures, are sufficient to ensure that GHG emission reductions or net GHG removals can be reported ex post and verified.
163. If the activity participants chose to delay the submission of the monitoring plan for the proposed CP in accordance with the activity standard, the DOE shall confirm and document that the submission of the monitoring plan is delayed.
164. For component projects involving removals and emission reduction component projects with reversal risks, the DOE shall assess the reviewed and updated monitoring plan every five years from the start of the first crediting period and in any of the circumstances as paragraph 153 above.

#### **7.8. Start date, crediting period type and duration**

165. The DOE shall determine whether the start date of the CP is on or after 1 January 2021, on or after the start date of the PoA period and whether it has been determined in accordance with the relevant requirements of the activity standard.

166. The DOE shall determine whether the type (i.e. renewable or fixed) and the length of the crediting period of the CP are specified in the generic CP in accordance with the requirements of the activity standard and in line with those that may be specified by the host Party in accordance with paragraph 27(b) of the RMPs, if applicable.
167. In cases where the DNA specified conditions that ensure that the total length of the crediting period(s) is shorter than the lifetime of the technology implemented, including any replacements undertaken during the crediting period, the DOE shall determine whether the crediting period(s) were adjusted accordingly.
168. The DOE shall determine whether the activity participants specified the following in accordance with relevant requirements in the activity standard:
- (a) Start date of the proposed CP;
  - (b) Reference to the notification to the secretariat of the intention for the proposed CP to be included in a planned to be registered or a registered A6.4 PoA submitted in accordance with the activity cycle procedure;
  - (c) Expected operational lifetime of the proposed CP;
  - (d) Type and duration of the crediting period;
  - (e) Start date of the crediting period.
169. The DOE shall confirm that the start date of any proposed CP is on or after the start date of the registered A6.4 PoA period.
170. The DOE shall assess the start date, type and duration of the crediting period specified in the CP-DD by means of a document review, use of official sources and its local and sectoral expertise, interviews with relevant personnel and/or, where conducted in accordance with paragraph 125 or 126 above, on-site inspection(s).
171. The DOE shall describe the steps taken to assess and state its opinion on the compliance of the start date, type and duration of the crediting period specified in the CP-DD with the relevant requirements in the activity standard.

## **7.9. Environmental impacts, social impacts and sustainable development impacts**

172. The DOE shall determine the appropriateness, relevance, and sufficiency of the information provided in A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form, and A6.4 Sustainable development impact form,<sup>14</sup> as reported in the CP-DD by:
- (a) Step1: Reviewing stakeholder consultation documents [inputs/comments];
  - (b) Step 2: Conducting interviews with local stakeholders;
  - (c) Step 3: Reviewing relevant host Party documentation;

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<sup>14</sup> Available at: <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-015.xlsx>; <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-016.xlsx> and <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-017.xlsx>

- (d) Step 4: Providing a validation opinion employing professional judgement.

173. The DOE shall validate:

- (a) Both quantitative and qualitative information provided, to assess the adequacy of the identification of environmental and/or social risks caused by the CP. The validation should be done by taking the four steps referred to in paragraph 172 above, in order to:
  - (i) Validate the risk assessment and risk mitigation plan presented in the A6.4 Environmental and social safeguards risk assessment form and the A6.4 Environmental and social management plan form, as per the relevant provisions of the A6.4 SD Tool;
  - (ii) If risks are identified in A6.4 Environmental and social safeguards risk assessment form, validate that the activity-level environmental and social indicators defined in the A6.4 Environmental and social management plan form ensure that the A6.4 activities do not cause harm, to the environment and stakeholders.
- (b) That the outcomes of the A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form have been shared during the local stakeholder consultation and that inputs received from the consultation are reflected in the completed form;
- (c) That there is an established continuous engagement of local stakeholders in accordance with A6.4 activity cycle procedure and A6.4 activity standard;
- (d) The appropriateness, relevance, and sufficiency of the information provided in the A6.4 Sustainable development impact form by taking the four steps referred to in paragraph 172 above in order to:
  - (i) Determine that the sustainable development (SD) objectives and/or criteria of the host Party documented in A6.4 Sustainable development impact form are in line with the host Party's definition, if applicable;
  - (ii) Determine that the A6.4 activity-level SD indicators defined in A6.4 Sustainable development impact form are universally applicable to the activity type and significant, recurring/lasting for at least the entire crediting period of the CP, and impacting the primary stakeholders and/or local environment in a direct and measurable way, resulting in a primary benefit;
  - (iii) Validate that the description of A6.4 activity-level SD indicators is accurately reflected in the A6.4 Sustainable development impact form.

## **7.10. Integrity safeguards**

174. The DOE shall determine whether the activity participants prepared a declaration that the development, implementation or operation of the proposed CP does not involve any illegal activities, including money laundering, tax evasion, fraud, bribery and criminal activities.

### **7.11. Local and subnational stakeholder consultation**

175. The DOE shall assess whether the local and, where appropriate, subnational stakeholder consultation process (hereinafter collectively referred to as local stakeholder consultation) was carried out in accordance with the applicable requirements of the activity standard.
176. The DOE shall request the DNA of the host Party of the proposed CP to forward to the DOE any complaints received by the DNA from stakeholders on the handling of the outcome of the local stakeholder consultation. In this case, the DOE shall promptly forward such complaints to the activity participants and subsequently determine whether the activity participants have taken due account of the complaints and modify the CP-DD as appropriate. If the DNA has not forwarded any such complaints to the DOE within 30 days of the request, the DOE shall conclude that there are no such complaints.

### **7.12. Eligibility for inclusion**

177. The DOE shall assess whether the proposed CP complies with the eligibility criteria for inclusion of CPs defined in the generic CP.

### **7.13. Validation opinion**

178. If the DOE determines that the proposed CP complies with the generic CP defined in the latest version of the registered PoA-DD and relevant Article 6.4 mechanism rules and requirements, the DOE shall issue a positive validation opinion and include the CP in the registered A6.4 PoA in accordance with the activity cycle procedure.
179. If the DOE determines that the proposed CP does not comply with the generic CP defined in the latest version of the registered PoA-DD or relevant Article 6.4 mechanism rules and requirements, the DOE shall issue a negative validation opinion.
180. If the DOE identifies the presence of unavoidable negative impacts that exceed the environmental and social safeguards elements and criteria and that cannot be remediated by consultation or mitigation, the DOE shall issue a negative validation opinion or submit a deviation request to the Supervisory Body prior to the inclusion of the CP.

### **7.14. Validation report**

181. In its validation report for the inclusion of the proposed CP in the registered A6.4 PoA, the DOE shall:
- (a) Provide all its applied approaches, findings and conclusion on:
    - (i) The completion of the CP-DD, using the valid version of the applicable form and following instructions therein;
    - (ii) A statement on whether, based on A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form, the CP results in no harm and contributes to SD;
    - (iii) The requirements relevant to the inclusion of the CP in the PoA referred to in paragraphs 178 and 179 above;

- (b) Report on all items listed in paragraph 120 above, except for sub-paragraph 120(g) above.

## **8. Validation of post-registration changes**

### **8.1. General requirements**

#### **8.1.1. Overarching requirement**

- 182. The DOE contracted by the activity participants to validate proposed or actual post-registration changes to the registered A6.4 PoA or an included CP shall be accredited for the validation function and in the sectoral scope(s) relevant to the PoA or the CP, respectively.
- 183. The DOE shall apply the objectives, approach and means of validation in section 6.1 above, mutatis mutandis, when validating the post-registration changes to the registered A6.4 PoA or the included CP, including the revised A6.4 Environmental and social safeguards risk assessment form, the revised A6.4 Environmental and social management plan form and the revised A6.4 Sustainable development impact form.
- 184. If the DOE determines that the proposed or actual post-registration changes to the registered A6.4 PoA or the included CP comply with the relevant Article 6.4 mechanism rules and requirements, the DOE shall issue a positive validation opinion. For the post-registration changes to the PoA on which a positive validation opinion was issued, the DOE shall, based on the request from the activity participants, submit a request for approval of the changes either under the prior-approval track or under the issuance track in accordance with the activity cycle procedure. For the post-registration changes to the CP on which a positive validation opinion was issued, the DOE shall notify the secretariat of the changes in accordance with the activity cycle procedure.
- 185. If the DOE determines that the proposed or actual post-registration changes to the registered A6.4 PoA or the included CP do not comply with the relevant Article 6.4 mechanism rules and requirements, the DOE shall issue a negative validation opinion.
- 186. The DOE shall determine whether the revised PoA-DD (with its revised generic CP-DD part) or the revised CP-DD reflecting the post-registration changes was prepared in both track-change and clean versions and was completed using the valid version of the applicable PoA-DD or CP-DD form.
- 187. If the activity participants used a later valid version of the PoA-DD or CP-DD form for preparing the revised PoA-DD or the revised CP-DD than the version used for the registered PoA-DD or CP-DD, the DOE shall determine whether the information transferred to the later valid version of the form is materially the same as that in the registered PoA-DD or CP-DD.
- 188. In its validation report for the post-registration changes, the DOE shall:
  - (a) Provide all its applied approaches, findings and conclusion on:
    - (i) The compliance of the revised PoA-DD or the revised CP-DD with the valid version of the applicable form and instructions therein, as applicable;

- (ii) Whether the information transferred to the later valid version of the PoA-DD or CP-DD form is materially the same as that in the registered PoA-DD or CP-DD, as applicable;
- (iii) The requirements relevant to the proposed or actual post-registration changes in section 8.2 below;
- (b) Report on all items listed in paragraph 120 above, except for its subparagraph 120(e) above.

## **8.2. Validation of compliance with specific requirements for post-registration changes**

### **8.2.1. General**

189. The DOE shall determine, by following the general validation requirements referred to in sections 5 and 6.1 above, *mutatis mutandis*, and section 8.1 above, whether the proposed or actual post-registration changes to the registered A6.4 PoA or the included CP falls within one of the following types of changes that may be allowed and complies with the respective requirements for post-registration changes contained in the activity standard:
- (a) Temporary deviations from the registered monitoring plan, the A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), applied methodologies, standardized baselines or other methodological regulatory documents, including the A6.4 SD Tool;
  - (b) Permanent changes:
    - (i) Corrections;
    - (ii) Inclusion of a monitoring plan;
    - (iii) Changes to the start date of the crediting period of the included CP;
    - (iv) Permanent changes to the registered monitoring plan, to the A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), or permanent deviation of monitoring from the applied methodologies, standardized baselines or other methodological regulatory documents, including the A6.4 SD Tool;
    - (v) Changes to the PoA or CP design;
  - (c) Registration under or overlap with other crediting scheme.
190. When validating the compliance of the proposed or actual post-registration changes with the relevant requirements for post-registration changes, the DOE shall additionally follow the specific guidance on validation for some types of post-registration changes provided in sections 8.2.2–8.2.3 below.

**8.2.2. Temporary deviations from the registered monitoring plan, the A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), applied methodologies, standardized baselines or other methodological regulatory documents, including the A6.4 SD Tool**

191. The DOE shall determine whether there is a temporary deviation from the monitoring plan in the included CP-DD (hereinafter referred to as the registered monitoring plan), the A6.4 SD Tool forms (A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents, including the A6.4 SD Tool and, if there is, the DOE shall determine whether the temporary deviation complies with the relevant requirements in the activity standard.
192. If the DOE identifies that the activity participants have temporarily deviated from the registered monitoring plan, the A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), the applied methodologies, the A6.4 SD Tool, the applied standardized baselines or the other applied methodological regulatory documents, the DOE shall determine whether the activity participants have described the nature, extent and duration of the non-conforming monitoring period, and proposed alternative monitoring arrangements or applied the most conservative values approach referred to in the activity standard for the non-conforming monitoring period.
193. If the DOE determines that the activity participants have proposed alternative monitoring arrangements for the non-conforming monitoring period, it shall determine whether the arrangements apply conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions or net GHG removals will not be overestimated as a result of the deviation.
194. If the deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines is applicable to the monitoring period under verification and part of the previous or subsequent monitoring period, the DOE shall determine the exact period to which the deviation applies.
195. The DOE shall state its opinion on whether the deviation complies with the relevant requirements in the activity standard.

**8.2.3. Permanent changes**

**8.2.3.1. Corrections**

196. If the activity participants have made corrections to the project information or parameters fixed at the registration of the A6.4 PoA or inclusion of the CP as described in the registered PoA-DD or CP-DD, the DOE shall determine whether:
  - (a) The activity participants documented them in a revised PoA-DD or CP-DD;
  - (b) The corrected information is an accurate reflection of actual project information; and/or
  - (c) The corrected parameters are in accordance with the applied methodologies, the registered monitoring plan, the applied standardized baselines and the other applied methodological regulatory documents.



197. The DOE shall state how the corrected information accurately reflects the actual information or how the corrected parameters reflect the application of the applied methodologies, the registered monitoring plan, the applied standardized baselines and the other applied methodological regulatory documents.

**8.2.3.2. Changes to the start date of the crediting period of a component project**

198. If the activity participants wish to change the start date of the crediting period of an included CP, the DOE shall determine whether the proposed change complies with the relevant requirements in the activity standard.
199. The DOE shall state its opinion on whether the change complies with the relevant requirements in the activity standard.

**8.2.3.3. Inclusion of monitoring plan**

200. If the activity participants chose to omit a monitoring plan at the inclusion of the CP and wish to include it thereafter, the DOE shall determine whether the design of the monitoring plan and other sections of the CP-DD comply with the relevant requirements in the activity standard and in accordance with the relevant requirements contained in section 7.7.8 above.
201. The DOE shall state its opinion on whether the monitoring plan in the revised CP-DD complies with the relevant requirements in the activity standard.

**8.2.3.4. Permanent changes to the registered monitoring plan and/or A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), or permanent deviation of monitoring from the applied methodologies, standardized baselines, or other applied methodological regulatory documents, including the A6.4 SD Tool**

202. If the activity participants wish to make a permanent change to the registered monitoring plan, or if the monitoring permanently deviates from the applied methodologies, the applied standardized baselines, or the other applied methodological regulatory documents, the DOE shall determine whether the activity participants have described the nature and extent of the non-conforming monitoring and the proposed alternative monitoring for the CP in the revised CP-DD, the permanent changes or deviation, and whether the proposed alternative monitoring complies with the relevant requirements in the activity standard.
203. The DOE shall determine whether the permanent change to the registered monitoring plan in the revised CP-DD is in line with the description in the generic CP-DD in the registered PoA-DD of how to develop the monitoring plan for each of the corresponding CPs and is in compliance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
204. If the DOE determines that the permanent change or the permanent deviation described in the revised CP-DD is not in line with the description in the generic CP-DD in the registered PoA-DD of how to develop the monitoring plan for each of the corresponding CPs, the DOE shall request the activity participants to prepare a revised PoA-DD to accommodate the permanent changes or permanent deviation for approval by the Supervisory Body first. Upon such revision of the PoA-DD, the DOE shall determine

whether the revised description is in compliance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents. If the revised description deviates from them, the DOE shall determine whether the conservative assumptions or discount factors are applied.

205. The DOE shall determine whether the permanent changes to the registered monitoring plan or the permanent deviation of the monitoring from the applied methodologies, the applied standardized baselines, or other applied methodological regulatory documents are likely to lead to a reduction in the accuracy of the calculation of GHG emission reductions or net GHG removals. If the DOE considers that the permanent changes or the permanent deviation will lead to a reduction in the accuracy of the calculation, the DOE shall request the activity participants to apply conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions or net GHG removals will not be overestimated as a result of the permanent change or the permanent deviation.
206. The DOE shall state its opinion on whether the permanent changes or the permanent deviation comply with the relevant requirements in the activity standard.
207. The DOE shall determine whether the permanent changes to the A6.4 SD Tool forms (A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form), provided as part of the revised CP-DD are in compliance with the A6.4 SD Tool and relevant provisions of the activity standard.
208. For component projects involving removals and emission reduction component projects with reversal risks, the DOE shall determine whether the monitoring plan and the risk assessment plan were reviewed and updated every five years and in the circumstances specified in paragraph 153 above, in accordance with relevant provisions of the activity standard, removals standard and other applied methodological regulatory documents.

#### **8.2.3.5. Changes to the programme or project design**

209. If the activity participants wish to make a proposed change or have made an actual change to the design of a registered A6.4 PoA or to the design of an included CP, the DOE shall determine whether the change complies with the relevant requirements in the activity standard.
210. The DOE shall determine whether the change to the design of the registered A6.4 PoA is for one or more of the following purposes:
  - (a) To expand the programmes' boundary to expand the geographic coverage or to include additional host Parties;
  - (b) To remove a methodology and/or standardized baseline from the registered PoA-DD;
  - (c) To change the capacity range specified in the registered PoA-DD;
  - (d) To change the design of the PoA;
  - (e) To add new components or extend/add technologies/measures, provided that they comply with the types of Article 6.4 activity that the host Party would approve in accordance with paragraph 26(e) of the RMPs;

- (f) To remove a component or technology/measure described in the registered PoA-DD;
  - (g) To change the technologies/measures specified in the registered PoA-DD;
  - (h) To change a generic CP to:
    - (i) Apply an applicable and valid standardized baseline to determine baseline emissions or parameter values;
    - (ii) Switch from an ex post to an ex ante determination of parameter values for calculating baseline emissions using a standardized baseline;
  - (i) To make any consequential changes to the application of methodologies and/or the standardized baselines resulting from the changes referred to in subparagraphs (b)– (h) above;
  - (j) To voluntarily update the applied methodologies to a later valid version of the same methodologies, or to change to another methodology;<sup>15</sup>
  - (k) To make any consequential changes to the eligibility criteria for inclusion of CPs in the registered A6.4 PoA, resulting from the changes referred to in subparagraphs (a)– (j) above;
211. If the registered A6.4 PoA has been amended to expand the geographic coverage or to include additional host Parties, the DOE shall assess and confirm that:
- (a) The registered PoA-DD has been revised to reflect the changes, in particular the eligibility criteria for inclusion of CPs;
  - (b) The baseline setting described in the relevant generic CP in the PoA-DD is applicable to the expanded PoA boundary;
  - (c) In the case of inclusion of additional host Parties, each DNA of the new host Parties has provided an approval of the PoA in accordance with section 6.2.11 above, and confirmed that the host Party and the other participating Party, if applicable, have provided authorization of activity participants in accordance with section 6.2.12 above.
212. If the registered A6.4 PoA has been amended to revise the eligibility criteria for the inclusion of CPs, the DOE shall assess and confirm that:
- (a) The revision of the eligibility criteria complies with the provisions and conditions set out in the activity standard. If the revision does not fall under any of the categories specified in the activity standard, the DOE shall direct the activity participants to seek guidance from the Supervisory Body on the appropriateness of the revision in accordance with the “Procedure: Consideration of unsolicited letters to the Supervisory Body”;

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<sup>15</sup> As per the activity cycle procedure, it is not mandatory for activity participants to apply a revised version of the methodology that is different from the version applied for the registration of the PoA. However, the activity cycle procedure also specifies that no new CPs can be included in the PoA until a post-registration change to the PoA to reflect the requirements of the new version of the methodology is approved by the Supervisory Body.

- (b) The revised eligibility criteria meet the requirements of the methodologies and the standardized baselines that are applied in the PoA;
  - (c) The registered PoA-DD is revised appropriately to reflect the revised eligibility criteria for inclusion of CPs.
- 213. If the registered A6.4 PoA has been amended to remove a methodology and/or standardized baseline, the DOE shall assess and confirm that:
  - (a) The change only involves the removal and no addition of a methodology and/or standardized baseline;
  - (b) The removal of the methodology and/or the standardized baseline does not affect the physical design of, and the end-use service provided by, the CPs that apply the methodologies and the standardized baselines that remain (i.e. the methodologies and the standardized baselines that were not removed).
- 214. If the registered A6.4 PoA has been amended to change the design of the PoA such that it may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA through the inclusion and implementation of CPs, the DOE shall assess and confirm that:
  - (a) The registered PoA-DD has been revised to reflect the changes;
  - (b) The DNA(s) of respective host Party(ies) have provided approval in accordance with the relevant requirements in the activity cycle procedure.
- 215. If the registered A6.4 PoA has been amended to change the capacity range specified in the generic CP-DD in the registered PoA-DD, the DOE shall assess and confirm that the change does not disqualify the applicability of the applied methodologies, applied standardized baselines and the other applied methodological regulatory documents.
- 216. If the registered A6.4 PoA has been amended to add new components or extend/add technologies/measures, provided that they comply with the types of Article 6.4 activity that the host Party would approve in accordance with paragraph 26(e) of the RMPs, the DOE shall assess and confirm that the change introduces complementary technologies/measures involving mass and/or energy transfer to/from the original technologies/measures.
- 217. If the registered A6.4 PoA has been amended to remove a component or technology/measure described in the generic CP-DD in the registered PoA-DD, the DOE shall assess and confirm that the removal of the component or technology/measure does not remove the applicability of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
- 218. If the registered A6.4 PoA has been amended to change the technologies/measures specified in the generic CP-DD in the registered PoA-DD, the DOE shall assess and confirm that the change only results in the same technologies/measures as in the registered technologies/measures as per the definition of “the same technologies” in the activity standard.
- 219. The DOE shall assess whether any change to the registered A6.4 PoA may result in an increase in the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA, and if positive, such increase is clearly indicated in the revised PoA-DD.

220. If the design of an included CP has been changed, the DOE shall assess and confirm that:
- (a) The reason for the increase in the capacity, if applicable, is not within the control of the activity participants. If the reason is within the control, the revised estimation of GHG emission reductions due to the change is within the applicable limit allowed in accordance with the activity standard;
  - (b) The increase or decrease in the capacity specified in the included CP-DD falls within the capacity range of the generic CP;
  - (c) The new components or extended/added technologies/measures are covered by the generic CP in the registered PoA-DD and introduce complementary technologies/measures involving mass and/or energy transfer to/from the technologies/measures described in the included CP-DD;
  - (d) The modified/changed technologies/measures are covered by the generic CP and result in the same technologies/measures as in the included CP-DD as per the definition of “the same technologies” in the activity standard;
  - (e) The included CP with the changes is within the scope of the generic CP;
  - (f) The eligibility criteria for these technologies/measures are specified in the generic CP;
  - (g) The change does not result in an increase in the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA, otherwise the DOE shall request the activity participants to proceed first with a post-registration change to the registered PoA-DD to reflect the change of increasing the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the registered A6.4 PoA in which the CP is included.
221. If the DOE establishes that the change of the design of the included CP, involving capacity increase or addition of a new technology or measure, results in exceeding the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the registered A6.4 PoA in which the CP is included, the DOE shall confirm whether:
- (a) A post-registration change to the registered PoA-DD has also been proposed by the activity participants to reflect the change of increasing the maximum annual amount;
  - (b) The DNA of the host Party of the PoA for which the maximum annual amount has been increased has provided an approval of the increase in accordance with the activity cycle procedure.
222. When conducting the validations referred to in paragraphs 215–220 above, in case of actual changes, the DOE shall, by means of an on-site inspection (where conducted in accordance with paragraph 125 or 126 above) and a review of the revised PoA-DD or CP-DD submitted by the activity participants that describes the nature and extent of the actual changes, determine whether this description accurately reflects the implementation, operation and monitoring of the modified A6.4 PoA or included CP.
223. When conducting the validations referred to in paragraphs 215–220 above, by means of an on-site inspection or other means of validation carried out in accordance with paragraph

- 125 or 126 above, the DOE shall assess the impacts of the actual changes on the monitoring plan, the level of accuracy of the monitoring activity, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
224. The DOE shall, by means of reviewing the revised PoA-DD or CP-DD against applicable additionality and other methodological requirements, determine whether the proposed or actual change would adversely affect the conclusions of the validation report on the registered A6.4 PoA or the included CP with regard to:
- (a) The applicability and application of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents with which the PoA or CP has been registered or included;
  - (b) The compliance of the monitoring plan with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
  - (c) The level of accuracy and completeness of the monitoring for the PoA or the CP;
  - (d) The additionality of the PoA or CP;
  - (e) Compliance with the A6.4 SD Tool;
  - (f) The eligibility criteria for inclusion of CPs in the PoA.
225. If the DOE determines that the proposed or actual change affects the additionality of the registered A6.4 PoA or the included CP, the DOE shall determine whether the demonstration of the impacts of the changes on the additionality is based on all original input data.
226. Notwithstanding paragraph 225 above, if the registered A6.4 PoA or the included CP uses an approved standardized baseline that standardizes additionality, and if the proposed or actual change affects the additionality of the PoA or the included CP, the DOE shall determine whether the demonstration of the impacts of the change on the additionality is based on the additionality criteria identified in the applied standardized baseline.
227. The DOE shall assess whether the revised PoA-DD or CP-DD complies with all the requirements of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
228. If the activity participants have voluntarily updated the applied methodologies and/or standardized baselines to a later valid version of them, or changed to other methodologies or standardized baselines, the DOE shall confirm that the revised PoA-DD meets all requirements of the updated/changed methodologies, including the standards, methodological tools and guidelines applied in accordance with the updated/changed methodologies and/or the updated/changed standardized baselines.
229. If the changes to the programme or project design affect the identification, assessment or monitoring of environmental, social or sustainable development impacts, the DOE shall assess whether the impacts caused by the changes were assessed and revised versions of the A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form (if applicable) and A6.4 Sustainable development impact form were provided. The DOE shall assess, prior to or as part of the

first verification of emission reductions or net removals, whether the revised A6.4 SD Tool forms are in compliance with requirements of the A6.4 SD Tool.

230. The DOE shall state its opinion on whether the proposed or actual change complies with the relevant requirements in the activity standard.

231. The DOE shall state its opinion on:

- (a) A description of the proposed or actual change as compared to the description in the registered PoA-DD or CP-DD;
- (b) An assessment of when the change occurred or will occur, reasons for the change taking place, whether the change would have been known prior to the registration of the A6.4 PoA or the inclusion of the CP, how the change would impact the overall operation/ability of the PoA or CP to deliver GHG emission reductions or net GHG removals as stated in the PoA-DD or CP-DD, and whether the revised estimation of GHG emission reductions or net GHG removals due to the changes are within the applicable limits allowed in accordance with the activity standard;
- (c) An assessment of whether the change would adversely affect the conclusions of the validation report on the registered A6.4 PoA or the included CP with regard to:
  - (i) The applicability and application of: (1) the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents with which the PoA or the CP has been registered or included; (2) the later valid version of the applied methodologies, the applied standardized baselines and/or the other applied methodological regulatory documents or other methodologies and/or standardized baselines that the PoA or the CP has been updated/changed to;
  - (ii) The project boundary of the CP and any associated leakages due to the changes;
  - (iii) The compliance of the revised monitoring plan with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
  - (iv) The level of accuracy and completeness in the monitoring of the PoA or the CP compared with the requirements contained in the registered monitoring plan;
  - (v) The additionality of the PoA or the CP;
  - (vi) Compliance with SD Tool;
  - (vii) The eligibility criteria for inclusion of CPs in the PoA.

232. In validating the revised PoA-DD or CP-DD containing the proposed or actual change, and in preparing the opinion, the DOE shall include the information on how:

- (a) The proposed revision ensures that the level of accuracy and completeness<sup>16</sup> in the monitoring and verification process is not reduced as a result of the revision. The DOE shall, using objective evidence, assess the accuracy and completeness of each proposed change to the registered monitoring plan, including the frequency of measurements, the quality of monitoring equipment (e.g. calibration requirements) and the quality assurance and quality control procedures;
- (b) The proposed revision complies with all requirements of:
  - (i) The applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents; or
  - (ii) The updated/changed methodologies, including the standards, methodological tools and guidelines applied in accordance with the updated/changed methodologies, and/or the updated/changed standardized baselines, if the applied methodologies and/or standardized baselines have been voluntarily updated to a later valid version of them or changed to other methodologies or standardized baselines;
  - (iii) The findings of previous verification and certification reports, if any, have been taken into account.

#### **8.2.3.6. Change of activity participant**

- 233. If, subsequent to the registration of the A6.4 PoA, the activity participants have been changed, either the DOE undertaking the next inclusion of a proposed CP, or the DOE that submits the next request for issuance of Article 6.4 emission reductions (A6.4ERs) for the PoA, or the DOE that submits the next post-registration change request for the PoA, whichever is earlier, shall determine whether the new activity participant has been authorized by the host Party of, or any other participating Party in, the PoA in accordance with the activity cycle procedure.
- 234. The DOE shall submit the validation opinion to the secretariat in accordance with the activity cycle procedure.
- 235. Notwithstanding the timing referred to in paragraph 233 above, the DOE shall submit the validation opinion to the secretariat in accordance with the activity cycle procedure if the activity participants wish the DOE to do so before the next inclusion of a proposed CP, the next request for issuance of A6.4ERs or the next post-registration change request for the PoA.

#### **8.2.4. Registration under or overlap with other crediting scheme**

- 236. The DOE shall determine the compliance with the requirements relating to registration or coverage by a programme, under any other international, regional, national, or subnational or sector-wide GHG mitigation crediting scheme contained in the activity standard based on the publicly available information and/or the information provided by the activity participants upon its request.

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<sup>16</sup> Completeness refers to inclusion of all relevant information for assessment of GHG emission reductions and the information supporting the methods applied as required. For example, if the DOE identifies an on-site generator for emergency use which was not included in the registered monitoring plan during the verification process, the monitoring of fuel consumption of this generator should be included in the monitoring plan



### **8.3. Validation report**

237. In its validation report for the post-registration changes, the DOE shall:

- (a) Report on all items listed in paragraph 120 above except for its subparagraph 120(g) above;
- (b) Provide all its applied approaches, findings and conclusion on the assessment of:
  - (i) Whether the revised PoA-DD or CP-DD is prepared using the valid version of the applicable form and following the instructions therein, as applicable;
  - (ii) Whether the information transferred to the later valid version of the PoA-DD or CP-DD form is materially the same as that in the registered PoA-DD or CP-DD, as applicable;
  - (iii) Whether the revised PoA-DD or CP-DD is prepared in both track-change and clean versions;
  - (iv) Whether the revised A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form are prepared using the valid version of the applicable forms and following the instructions therein, as applicable;
  - (v) The compliance of the proposed or actual post-registration changes with the requirement for post-registration changes conducted in accordance with sections 8.1–8.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them.

238. The DOE shall notify the activity participants of the validation outcome, containing:

- (a) A positive validation opinion and the date of submission of the validation report as part of the request for approval of post-registration changes to the secretariat; or
- (b) A negative validation opinion, including the reasons for the post-registration changes as documented having been determined as not complying with the relevant requirements for post-registration changes.

## **9. Verification of implementation and monitoring**

### **9.1. Objective of verification**

239. The DOE shall conduct a thorough and independent assessment of the implementation and the reported GHG emission reductions or net GHG removals achieved by a registered A6.4 PoA and the included CPs against the applicable Article 6.4 mechanism rules and requirements.

#### **9.1.1. Overarching requirements**

240. The DOE shall assess and determine whether the implementation and operation of the registered A6.4 PoA and the included CPs, and the steps taken to report GHG emission reductions or net GHG removals, comply with the relevant Article 6.4 mechanism rules and requirements. This assessment shall involve a review of relevant documentation as

well as, where conducted in accordance with paragraphs 264–265 below, an on-site inspection(s). For an on-site inspection(s), the DOE may apply a sampling approach in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.

241. The DOE shall assess whether the data collection system meets the requirements of the registered monitoring plan as per the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
242. The DOE shall:
- (a) Determine whether the registered A6.4 PoA and the included CPs have been implemented and are operating in accordance with the registered PoA-DD and CP-DDs;
  - (b) Determine whether GHG emission reductions or net GHG removals have been monitored in accordance with the registered monitoring plan(s).

#### **9.1.2. Other requirements**

243. The DOE shall assess both quantitative and qualitative information on GHG emission reductions or net GHG removals provided in the monitoring report.<sup>17</sup>
244. In addition to the monitoring documentation, the DOE shall review:
- (a) The registered PoA-DD and CP-DDs, including the registered monitoring plan(s) and/or the changes to the registered PoA-DD or CP-DDs, and the corresponding validation opinions;
  - (b) The validation report;
  - (c) Previous verification and certification reports, if any;
  - (d) The applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
  - (e) The monitoring results of environmental impacts, social impacts and sustainable development impacts of the included CPs;
  - (f) Any other information and references relevant to the GHG emission reductions or net GHG removals achieved by the included CPs (e.g. Intergovernmental Panel on Climate Change (IPCC) reports, data on electricity generation in the national grid or laboratory analysis, national regulations).
245. In addition to reviewing the monitoring documentation, the DOE shall determine whether the activity participants have addressed the FARs identified during the previous validation or verification.

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<sup>17</sup> Quantitative information comprises the reported numbers in the monitoring report. Qualitative information comprises information on internal management controls, calculation procedures, procedures for transfer of data, frequency of the monitoring reports, and review and internal audit of calculations.

### 9.1.3. Quality of evidence

246. When verifying the reported GHG emission reductions or net GHG removals, the DOE shall confirm that there is an audit trail that contains the evidence and records that validate or invalidate the stated figures. The audit trail shall include the source documents that form the basis for assumptions and other information underlying the GHG data.
247. When assessing the audit trail, the DOE shall:
- (a) Address whether there is sufficient evidence available, both in terms of frequency (time period between evidence) and coverage (in covering the full monitoring period);
  - (b) Address the source and nature of the evidence (external or internal, oral or documented);
  - (c) Cross-check the monitoring report against other sources, such as comparable information, where available, from sources other than those used in the monitoring report, to determine whether the stated figures are correct.
248. The DOE shall only certify GHG emission reductions or net GHG removals that are based on verifiable evidence.

### 9.1.4. Application of materiality

#### 9.1.4.1. General

249. The concept of materiality is applicable to the verification of monitored GHG emission reductions or net GHG removals achieved by all types of registered A6.4 PoAs. It is not applicable to:
- (a) Uncertainties related to measurement;
  - (b) Addressing temporary deviations and permanent changes to the registered monitoring plan, the applied methodologies or the applied standardized baselines, regardless of whether the corresponding GHG emission reductions or net GHG removals are above or below materiality thresholds.
250. A DOE that plans and conducts verification using the concept of materiality shall achieve a reasonable level of assurance that the reported GHG emission reductions or net GHG removals are free from material errors, omissions or misstatements in accordance with paragraphs 251–261 below.
251. An omission, misstatement, or erroneous reporting of information is material if it might lead, at an aggregated level, to an overestimation of the total GHG emission reductions or net GHG removals achieved by a registered A6.4 PoA equal to or higher than the following thresholds:
- (a) 0.5 per cent of the emission reductions or removals for registered A6.4 PoAs achieving a total emission reduction or removal equal to or more than 500,000 t CO<sub>2</sub> eq per year;<sup>18</sup>

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<sup>18</sup> A year refers to a period of 12 consecutive months.

- (b) 1 per cent of the emission reductions or removals for registered A6.4 PoAs achieving a total emission reduction or removal of between 300,000 and 500,000 t CO<sub>2</sub> eq per year;
  - (c) 2 per cent of the emission reductions or removals for registered A6.4 PoAs achieving a total emission reduction or removal of 300,000 t CO<sub>2</sub> eq per year or less.
252. Recognizing that circumstances may exist that could cause the information reported by the activity participants to be materially misstated, the DOE should plan and perform verifications with an attitude of professional scepticism and rely on its professional judgment when applying the concept of materiality.
253. The application of the concept of materiality and reasonable level of assurance implies that some data or information may not be checked. However, the DOE should design its verification and sampling plans to detect all material errors, omissions or misstatements, and any unchecked data or information should not contain any material errors, omissions or misstatements. A DOE's verification opinion applies to 100 per cent of the data and information, even if the DOE may not have checked the entire data set and information.
254. Applying the concept of materiality does not mean that identified errors are not to be corrected; if an error, omission or misstatement is identified by the DOE, regardless of whether it is material or not, the DOE shall request the activity participants to address it.

#### **9.1.4.2. Consideration of materiality in planning verification**

255. The DOE should:
- (a) Identify the materiality threshold referred to in paragraph 251 above that corresponds to the amount of GHG emission reductions or net GHG removals that the specific registered A6.4 PoA will achieve;
  - (b) Understand the environment in which the registered A6.4 PoA operates, the sources of project emissions within the project boundary and the leakage, the monitoring activities, the equipment used to monitor or measure project data, the origin and application of data used to calculate or measure the emissions, the data flow, the internal quality control system, and the overall organization with respect to monitoring and reporting;<sup>19</sup>
  - (c) Conduct a risk assessment to identify and assess the risks of individual or aggregated material errors, omissions or misstatements that may occur within the threshold based on the elements referred to in subparagraphs (a) and (b) above;
  - (d) Design verification plans, audit procedures<sup>20</sup> and sampling plans whose type, timing<sup>21</sup> and extent are based on and are responsive to the assessed risks of material errors, omissions or misstatements.

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<sup>19</sup> Adapted from European Union. 2007. Commission Decision of 18 July 2007 establishing guidelines for the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council.

<sup>20</sup> In accordance with section 9.2.5.

<sup>21</sup> For example, timing may refer to the specific time intervals for which the DOE may draw its samples.

256. The materiality thresholds apply to the total GHG emission reductions or net GHG removals actually achieved. When planning verification, the DOE should apply the applicable materiality threshold to the reported total emission reductions or removals. If, as a result of the verification, the initially reported total emission reductions or removals is revised, the DOE should reapply the materiality threshold to the revised total emission reductions or removals and, if needed, make adjustments to its verification plans and sampling plans.

#### **9.1.4.3. Consideration of materiality in conducting verification**

257. The DOE should:

- (a) Apply verification plans, audit procedures and sampling plans;
- (b) Assess potential errors, omissions and misstatements against the materiality threshold to determine whether they are material individually or in aggregate and whether further audit procedures are needed.

258. If an error, omission or misstatement is detected, the DOE should be aware that it may not be an isolated occurrence and may be a systemic reoccurring error. For example, other errors may exist if the DOE identifies that the error, omission or misstatement arose from a breakdown in the activity participants' internal quality control and quality assurance system.

259. If an immaterial error, omission or misstatement is detected, the DOE shall request the activity participants to address it and should determine whether additional audit procedures should be conducted in order to reach a reasonable level of assurance that the verified GHG emission reductions or net GHG removals are free from material error, omission or misstatement.

260. If a material error, omission or misstatement is detected, the DOE shall, depending on the circumstances of the error, immediately request the activity participants to address it, or conduct additional audit procedures to confirm or determine the context and magnitude of the error, omission or misstatement and then request the activity participants to address it.

261. If further audit procedures are necessary, the DOE may consider whether the overall verification plans and sampling plans need to be revised.

#### **9.1.5. Standard auditing techniques**

262. The DOE shall assess the information provided by the activity participants.

263. In assessing the information, the DOE shall apply the means of verification specified throughout this standard and, where appropriate, standard auditing techniques, including but not limited to:

- (a) Document review, involving:
  - (i) A review of data and information;
  - (ii) A review of the registered monitoring plans, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, paying particular attention to the frequency of

- measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures;
  - (iii) An evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of GHG emission reductions or net GHG removals;
  - (b) Follow-up actions (e.g. on-site inspection, telephone/e-mail interviews), including:
    - (i) An assessment of the implementation and operation of the included CPs as per the included CP-DDs or latest approved revised CP-DDs;
    - (ii) A review of information flows for generating, aggregating and reporting the monitoring parameters;
    - (iii) Interviews with relevant personnel to determine whether the operational and data collection procedures are implemented in accordance with the registered monitoring plans;
    - (iv) Cross-checks between the information provided in the monitoring report and data from other sources such as plant logbooks, inventories, purchase records or similar data sources to determine whether the information in the monitoring report is reliable;
    - (v) A check of the monitoring equipment, including calibration performance, and observations of monitoring practices against the requirements of the registered monitoring plans, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
    - (vi) A review of calculations and assumptions made in determining the GHG data and GHG emission reductions or net GHG removals;
    - (vii) An identification of quality control and quality assurance procedures in place to prevent, or identify and correct, any errors or omissions in the reported monitoring parameters;
  - (c) Sampling approach in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body, including:
    - (i) A random sampling for cases where the activity participants did not apply a sampling approach to monitoring;
    - (ii) An acceptance sampling or another sampling approach for cases where the activity participants applied a sampling approach to monitoring.
264. It is mandatory for the DOE to conduct an on-site inspection at verification for an included CP if:
- (a) It is the first verification for the DOE with regard to this CP;
  - (b) More than three years have elapsed since the last on-site inspection conducted for verification for the CP; or

- (c) The CP has achieved more than 300,000 t CO<sub>2</sub> eq of GHG emission reductions or net GHG removals since the last verification when an on-site inspection was conducted.
265. For cases that are not referred to in paragraph 264 above, it is optional for the DOE to conduct an on-site inspection at verification. If the DOE does not conduct an on-site inspection as a means of verification, it shall describe the alternative means used and justify that they are sufficient for the purpose of verification. If the DOE conducts a remote inspection as an alternative means to an on-site inspection, the DOE should follow the guidance contained in Appendix 1.
266. If any issue related to the project design, including those attributable to the lack of on-site inspection at the previous verification, is identified at the verification, the DOE that detected the issue shall rectify it through the post-registration change process in accordance with the activity cycle procedure.
267. Where no specific means of verification are specified, the DOE should apply the standard auditing techniques described in paragraph 263 above.

#### **9.1.6. Corrective action requests, clarification requests and forward action requests**

268. If the DOE identifies issues that require further elaboration, research or expansion in order to determine whether the implementation or the operation of the registered A6.4 PoA and the included CPs, or the monitoring of GHG emission reductions or net GHG removals, meets the relevant Article 6.4 mechanism rules and requirements, the DOE shall ensure that these issues are accurately identified, formulated, discussed and concluded in the verification and certification report.
269. The DOE shall raise a CAR if one of the following situations occurs:
- (a) Non-compliance with the registered monitoring plans, the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents is found in monitoring and reporting and has not been sufficiently documented by the activity participants, or if the evidence provided to prove conformity is insufficient;
  - (b) Modifications to the implementation or operation of the registered A6.4 PoA or the included CPs, or the monitoring of GHG emission reductions or net GHG removals, have not been sufficiently documented by the activity participants;
  - (c) Mistakes have been made by the activity participants in applying assumptions, data or calculations of GHG emission reductions or net GHG removals that will impact the quantity of emission reductions or removals;
  - (d) Issues identified in a FAR during the previous validation or verification have not been resolved by the activity participants.
270. The DOE shall raise a CL if the information provided by the activity participants is insufficient or not clear enough to determine whether the applicable Article 6.4 mechanism rules and requirements have been met.
271. The DOE shall raise a FAR if issues related to monitoring and reporting that require attention and/or adjustment at the next verification are identified.

272. The DOE shall resolve or “close out” CARs and CLs only if the activity participants rectify the monitoring report, or provide additional explanations or evidence that satisfy the DOE’s concerns. If this is not done, the DOE shall not submit a request for issuance of A6.4ERs.
273. The DOE shall report on all CARs, CLs and FARs in its verification and certification report. This reporting shall explain the issues raised, the responses provided by the activity participants, the means of verification of such responses, and references to any resulting changes in the monitoring report or its supporting documents.

## **9.2. Verification of compliance with specific requirements for issuance**

### **9.2.1. General**

274. The DOE shall determine, by following the general verification requirements referred to in sections 5 and 9.1 above, whether the monitoring complies with all relevant requirements for monitoring as contained in the activity standard.
275. The DOE shall:
- (a) Identify the included CPs that it shall consider for verification in accordance with the methods/procedure to be used and specified in the registered PoA-DD for verification of the amount of GHG emission reductions or net GHG removals achieved by the CPs. If the registered A6.4 PoA has more than one host Party and a host Party’s DNA withdraws its approval of the PoA and/or its authorization of the activity participants, the DOE shall identify only the CPs that are unaffected by the withdrawal;
  - (b) Take into account the possible existence of included CPs complying with different versions of the registered PoA-DD<sup>22</sup> and the need to account for this in its sampling approach to ensure that a statistically sound sample of CPs from each version of the PoA-DD is being verified;
  - (c) Systematically verify and certify the correct implementation and operation of the record-keeping system.
276. The DOE shall include in its verification and certification report a description of how it applied the methods/procedures for the purpose of verification. The DOE shall include in its verification and certification report a description of the on-site inspection(s), where conducted in accordance with paragraph 264 or 265 above.
277. If the activity participants have prepared a single monitoring report for a monitoring period, the DOE shall confirm that the monitoring report covers all CPs included in the registered A6.4 PoA whose crediting periods overlap with the monitoring period, and contains all monitoring results obtained during the monitoring period.
278. If the activity participants have prepared multiple monitoring reports for separate batches of CPs included in the registered A6.4 PoA, the DOE shall confirm that all the monitoring reports contain mutually exclusive batches of CPs, have the same monitoring period, and collectively contain all monitoring results obtained during the period, and that each

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<sup>22</sup> CPs complying with the pre- and post-update of the PoA-DD due to the renewal of the PoA period or post-registration changes during a PoA period have separate monitoring reports in accordance with the activity standard.



monitoring report contains only monitoring results of the CPs that follow the same version of the PoA-DD.

279. The DOE shall confirm that monitoring periods have been consecutive. Further, the DOE shall confirm that CPs have been included in requests for issuance of A6.4ERs in a consecutive manner; that is, when a CP has been covered in a request for issuance for a monitoring period, the DOE shall confirm that a request for issuance for the previous monitoring period that covered the particular CP has been published.
280. Notwithstanding paragraph 279 above, if the registered A6.4 PoA applies any of the methodologies listed in the activity standard as potentially accruing negative emission reductions in a monitoring period, the DOE shall confirm that A6.4ERs have been issued for all CPs included in the PoA for the previous monitoring period.
281. A request for issuance of A6.4ERs shall relate to the A6.4ERs certified.
282. The DOE shall confirm the compliance with the requirements on:
- (a) General requirements, including on:
    - (i) The implementation and operation of the A6.4 PoA and the included CPs as per the description in the registered PoA-DD and CP-DDs;
    - (ii) The continuous monitoring as per the registered monitoring plans;
    - (iii) The coverage of the monitoring period;
    - (iv) The presentation of monitoring results by year of occurrence of GHG emission reductions or net GHG removals;
    - (v) The preparation of monitoring reports in chronological order and separation of them by CPs that follow different versions of the PoA-DD;
    - (vi) The application of appropriate GWPs;
    - (vii) The maintenance of monitoring results;
    - (viii) The maximum annual amount of GHG emission reductions or net GHG removals to be achieved by the PoA as approved by the host Party;
  - (b) The avoidance of double issuance;
  - (c) The description of implemented PoA and included CPs;
  - (d) The description of monitoring system;
  - (e) Reversal related actions for component projects involving removals and emission reductions component projects with reversal risks;
  - (f) The provision of data and parameters used;
  - (g) The calculation of GHG emission reductions or net GHG removals-;
  - (h) The continuous engagement of stakeholders.
283. When verifying the compliance of the implementation and the operation of the registered A6.4 PoA and included CPs and monitoring of GHG emission reductions or net GHG

removals with the requirements for implementation, operation and monitoring referred to in paragraph 282 above, the DOE shall additionally follow the specific guidance on verification regarding some of these requirements provided in sections 9.2.2–9.2.11 below.

284. The DOE shall ensure before submitting the request for first issuance for the PoA that the host Party statement of authorization of the use of A6.4ERs was provided.

#### **9.2.2. Avoidance of double issuance**

285. The DOE shall determine whether the registered A6.4 PoA or any of the included CPs are also registered, or covered by a programme, under any other international, regional, national or subnational GHG mitigation crediting scheme prior to the request for issuance based on the confirmation from such other crediting scheme, if applicable, public information and any other information obtained from the activity participants.
286. If the DOE determines that the registered A6.4 PoA or any of the included CPs are registered, or covered by a programme, under another crediting scheme, the DOE shall additionally determine whether the activity participants have obtained a confirmation from the other crediting scheme that the same GHG emission reductions or net GHG removals being requested for issuance of A6.4ERs have not been or will not be credited under the other crediting scheme.

#### **9.2.3. Compliance of the monitoring report with the monitoring report form**

287. The DOE shall determine whether the monitoring report was completed using the valid version of the applicable monitoring report form.
288. The DOE shall state its opinion on the compliance of the monitoring report with the relevant form and instructions therein.

#### **9.2.4. Compliance of the programme implementation with the registered programme of activity design document**

289. The DOE shall identify any concerns related to the conformity of the implemented registered A6.4 PoA and the included CPs and their operations with the registered PoA-DD and CP-DDs and determine whether:
- (a) The PoA and the CPs have been implemented and are operating in accordance with the descriptions contained in the registered PoA-DD and CP-DDs; or
  - (b) Any deviation or the proposed or actual changes in the implementation or operation of the PoA and/or the CPs comply with the relevant requirements in the activity standard, or
  - (c) The sum of the amount of GHG emission reductions or net GHG removals requested for issuance and the cumulative amount of GHG emission reductions or net GHG removals already issued for the PoA are up to the maximum annual amount of GHG emission reductions or net GHG removals approved by the host Party.
290. By means of an on-site inspection or other means of verification in accordance with paragraph 264 or 265 above, the DOE shall assess that all physical features (e.g. technology, project equipment, and monitoring and metering equipment) of the included

CPs specified in the CP-DDs are in place and that the activity participants are operating the registered A6.4 PoA and the included CPs as per the registered PoA-DD and CP-DDs. If an on-site inspection is not conducted, the DOE shall justify the rationale for the decision.

291. For each monitoring period, the DOE shall report:

- (a) The implementation status of the registered A6.4 PoA and the included CPs. For an included CP that consists of more than one site, the DOE shall describe the status of implementation and the starting date of operation for each site. For an included CP with phased implementation, the DOE shall state the progress of the project achieved in each phase under verification. If the phased implementation is delayed, the DOE shall describe the reasons and present the expected implementation dates;
- (b) The actual operation of the included CPs;
- (c) The information (data and variables) provided in the monitoring report that is different from that stated in the registered PoA-DD or CP-DDs and has caused an increase in the GHG emission reductions or net GHG removals achieved by the included CPs in the current monitoring period or is highly likely to increase the estimates in the future monitoring periods;<sup>23</sup>
- (d) An opinion on the cause of any increase in the actual GHG emission reductions or net GHG removals achieved by the included CPs in the current monitoring period that was reported in monitoring report.

#### **9.2.5. Compliance of the registered monitoring plan with applied methodologies and standardized baselines**

292. The DOE shall determine whether the registered monitoring plans are in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents based on the actual implementation of the CPs.
293. For monitoring aspects that are not specified in the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, the DOE should highlight issues which may enhance the level of accuracy and completeness of the registered monitoring plans.
294. The DOE shall state its opinion on whether the registered monitoring plans are in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.

#### **9.2.6. Monitoring activities**

295. The DOE shall determine whether the monitoring of parameters related to GHG emission reductions or net GHG removals specified in the CP-DDs have been implemented in accordance with the registered monitoring plans.
296. The DOE shall determine whether:

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<sup>23</sup> Discrepancies may include higher water availability than expected in the CP-DD, which may increase the electricity output from a hydropower plant, or a higher plant load factor owing to higher bagasse availability during the crushing season, which increases the production of steam and electricity.

- (a) The registered monitoring plans have been properly implemented and followed by the activity participants;
  - (b) All parameters stated in the registered monitoring plans have been monitored and updated as applicable;
  - (c) The equipment used for monitoring is controlled and calibrated in accordance with the registered monitoring plans, the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents, local/national standards, or as per the manufacturer's specification;
  - (d) Monitoring results are consistently recorded as per the approved frequency;
  - (e) Quality assurance and quality control procedures have been applied in accordance with the registered monitoring plans.
297. If the activity participants applied a sampling approach to determine data and parameters monitored, the DOE shall assess the compliance of the sampling efforts and surveys with the validated sampling plan in accordance with the standard for sampling and surveys for A6.4 activities to be developed by the Supervisory Body.
298. The DOE shall list each parameter required by the registered monitoring plans and state how it verified the information flow (from data generation and aggregation, to recording, calculation and reporting) for these parameters, including the values in the monitoring report.
299. For CPs involving removals and emission reduction CPs with reversal risks, the DOE shall determine whether the monitoring report includes the following specific elements as per the activity standard and the respective provisions of the removals standard and any applied methodological regulatory documents:
- (a) A description of the monitoring activities and methods used;
  - (b) The estimated GHG emission reductions and/or net removals occurring during the monitoring period, together with the associated uncertainty;
  - (c) Data collected, including the remote-sensing data, or if the data set is too large, a summary of the data and an indication of how the full data set can be accessed;
  - (d) Records and logs of the observed events of GHG release that potentially could have led to the reversal of removals and/or emission reductions along with a summary of the GHG release notifications that were submitted during the period covered by the monitoring report;
  - (e) Information on how the risks of reversal were assessed and addressed, consistent with the risk mitigation measures described in the registered CP-DD;
  - (f) Information on how any negative environmental and social impacts have been assessed, mitigated, and managed, consistent with the measures described in the registered CP-DD.

#### **9.2.7. Calibration frequency for measuring instruments**

300. The DOE shall determine whether the calibration of the measuring equipment that has an impact on the GHG emission reductions or net GHG removals achieved by the included

CPs is conducted by the activity participants at the frequency specified in the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents or the registered monitoring plans.

301. If, during the verification for a certain monitoring period, the DOE identifies that the calibration has been delayed and the calibration has been implemented after the monitoring period in consideration (i.e. the results of delayed calibration are available), referring to the illustrative examples in Appendix 2, the DOE may conclude its verification, provided the following conservative approach is adopted in the calculation of GHG emission reductions or net GHG removals:
- (a) Applying the maximum permissible error<sup>24</sup> of the instrument to the measured values taken during the period between the scheduled date of calibration and the actual date of calibration, if the results of the delayed calibration do not show any errors in the measuring equipment, or if the error is smaller than the maximum permissible error; or
  - (b) Applying the error identified in the delayed calibration test, if the error is beyond the maximum permissible error of the measuring equipment.
302. The DOE shall confirm that the error has been applied:
- (a) In a conservative manner, such that the adjusted measured values of the delayed calibration shall result in fewer GHG emission reductions or net GHG removals that are deemed achieved by the included CPs;
  - (b) For all measured values taken during the period between the scheduled date of calibration and the actual date of calibration.
303. If the results of the delayed calibration are not available, or the calibration has not been conducted at the time of the verification, the DOE, prior to finalizing the verification, shall request the activity participants to conduct the required calibration and shall determine whether the activity participants have calculated GHG emission reductions or net GHG removals conservatively using the approach mentioned in paragraph 301 above.
304. If the DOE determines that it is not possible for the activity participants to conduct the calibration at the frequency specified in the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents or the registered monitoring plans due to reasons beyond the control of the activity participants,<sup>25</sup> the DOE shall follow the applicable requirements related to post-registration changes in section 8 above.
305. If neither the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents nor the registered monitoring plans specify any requirements for calibration frequency for the measuring equipment, the DOE shall determine whether the equipment is calibrated either in accordance with the specifications of the local/national standards or as per the manufacturer's specification. If neither local/national standards nor the manufacturer's specification are available, the DOE shall

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<sup>24</sup> The maximum permissible errors of all the measuring instruments are specified by the respective manufacturers as part of their technical specifications.

<sup>25</sup> For example, due to the contractual terms between the activity participant and purchasing/selling entities.

determine whether the equipment is calibrated in accordance with the specifications of the international standards.

#### **9.2.8. Reversal related actions for component projects involving removals and emission reductions component projects with reversal risks**

306. In cases of any observed event involving the release of stored GHGs that could potentially lead to reversal, the DOE shall determine on the basis of transparent and verifiable evidence whether the event as per the preliminary assessment report, prepared in accordance with the requirements of the activity standard, respective provisions of the removals standard on reversal-related actions and any other relevant applied methodological regulatory documents, results in an actual reversal or not.
307. If the Supervisory Body does not approve the preliminary assessment report, or if the preliminary assessment report concludes that the observed event has resulted in an actual reversal and a monitoring report is prepared, the DOE shall determine whether the monitoring report is in compliance with the requirements of the activity standard, respective provisions of the removals standard and any other relevant applied methodological regulatory documents.
308. The DOE shall also assess whether the monitoring report accurately estimates the magnitude of reversals and correctly characterizes them as avoidable or unavoidable.
309. The DOE shall also assess whether following the submission of the monitoring report:
- (a) The risk assessment of the affected CPs has been updated and the risk rating of the affected CPs has been revised;
  - (b) The compliance with requirements and safeguards contained in the A6.4 SD Tool, taking into account any negative environmental and social impacts caused by the reversal and plans developed to prevent the recurrence of such negative environmental and social impacts, has been reviewed.

#### **9.2.9. Data and calculations of emission reductions or net removals**

310. The DOE shall assess the data and calculations of GHG emission reductions or net GHG removals achieved by the included CPs and determine whether:
- (a) A complete set of data for the specified monitoring period is available. If only partial data are available because activity levels or non-activity parameters have not been monitored in accordance with the registered monitoring plans, the DOE shall assess whether:
    - (i) The most conservative values approach is applied to the parameters for the entire non-monitoring period in accordance with the provisions relating to temporary deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines in the activity standard; or
    - (ii) Alternative monitoring arrangements for the non-monitoring period are described, whether they apply conservative assumptions or discount factors to the calculations, and whether the alternative monitoring arrangements have been approved by the Supervisory Body under the prior-approval track or under the issuance track in accordance with the provisions relating to

temporary deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines in the activity standard and the activity cycle procedure;

- (b) The information provided in the monitoring report has been cross-checked with other sources such as plant logbooks, inventories, purchase records and laboratory analysis;
- (c) The calculations of baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals, and leakage GHG emissions have been carried out in accordance with the formulae and methods described in the registered monitoring plans, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
- (d) Where CPs involving removals also result in emission reductions, the accounting of removals and emission reductions has been separated in the monitoring report in accordance with the methodologies applicable to the activity.
- (e) Any assumptions used in emission or removal calculations have been justified;
- (f) Appropriate emission factors, IPCC default values, GWPs and other reference values have been correctly applied;
- (g) If the included CPs apply an approved standardized baseline that standardizes baseline emissions, the standardized values of the parameters have been applied using the correct version of the applied standardized baseline in accordance with the activity standard.

311. The DOE shall provide:

- (a) An indication of whether a complete set of data for the monitoring period was not available because activity levels or non-activity parameters were not monitored in accordance with the registered monitoring plans, and if so, whether the most conservative values approach was applied or alternative monitoring arrangements were proposed or have been approved by the Supervisory Body;
- (b) A description of how the DOE cross-checked reported data;
- (c) A confirmation that appropriate methods and formulae for calculating baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals and leakage GHG emissions, have been followed;
- (d) An opinion on whether the assumptions, emission factors and default values that were applied in the calculations have been justified.

#### **9.2.10. Environmental impacts, social impacts and sustainable development impacts**

- 312. The DOE shall verify the appropriateness, relevance, and sufficiency of information provided in the monitoring of the environmental and social indicators in the A6.4 Environmental and social management plan form and the A6.4 activity-level SD indicators in the A6.4 Sustainable development impact form, as reported in a monitoring report.
- 313. If the DOE observes any deviation from the information in the A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form that were

validated at the registration, it shall provide its opinion to the activity participants on the observed deviation, indicating whether the A6.4 activity is still within the social and environmental impact and/or SD impact defined in the A6.4 Environmental and social safeguards risk assessment form, A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form.

314. The DOE shall review any input and comments received via continuous engagement of local stakeholders in accordance with the activity standard, conduct interviews with local stakeholders, and employ professional judgement in the evaluation of the ex-post fulfilment of risk assessments and SD impacts due to the CP.
315. The DOE shall confirm that the activity participants have measured, monitored, and reported the parameters established in the A6.4 Environmental and social management plan form and A6.4 Sustainable development impact form submitted at the registration stage.
316. For projects that successfully transitioned from the clean development mechanism (CDM) and that prepared a “Sustainable development co-benefits description report” in accordance with the “Sustainable development co-benefits tool” at the time of transition, the DOE shall determine whether the monitoring report includes the outcome of monitoring of the sustainable development co-benefits of the project based on the document describing how the activity participant monitors sustainable development co-benefits of the activity, including the frequency of reporting of monitoring results in accordance with relevant provisions of the “Standard: Transition of CDM activities to the Article 6.4 mechanism”.

#### **9.2.11. Continuous engagement of stakeholders**

317. The DOE shall determine whether the activity participants have received comments on the implementation or operation of the registered A6.4 PoA and the included CPs from local stakeholders after their registration or inclusion through the process of continuous engagement of stakeholders in accordance with the activity standard, and if so, determine whether the activity participants have addressed the issues raised in the comments in the implementation or operation of the PoA or the CPs, as appropriate.
318. The DOE shall also determine whether comments on the compliance of the registered PoA and included CPs with applicable Article 6.4 mechanism rules and requirements have been submitted from Parties, stakeholders and UNFCCC-admitted observer organizations and published on the UNFCCC website in accordance with the activity cycle procedure, and if so, determine whether the activity participants have addressed the issues raised in the comments.

#### **9.3. Verification and certification report**

319. The DOE shall report the results of its assessment in the verification and certification report, including the following:
  - (a) An executive summary of the verification process and its conclusions;
  - (b) Details of the verification team, technical experts and internal reviewers involved, together with their roles in the verification activity and, where conducted in accordance with paragraphs 264–265 above, details of who conducted the on-site inspection;



- (c) A list of interviewees, documents reviewed, sampling approaches used by the DOE and, where conducted in accordance with paragraphs 264–265 above, outline of the on-site inspection. If the DOE applied a sampling approach to the on-site inspection, the DOE shall include a description of how the sample size was determined and how the field check was carried out;
  - (d) Results of the dialogue between the DOE and the activity participants, as well as any adjustments made to the monitoring report following the continuous engagement of stakeholders;
  - (e) The applied approach, findings and conclusion in the assessment of compliance with each requirement for issuance conducted in accordance with sections 9.1–9.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them;
  - (f) A list of each parameter specified by the registered monitoring plans and a statement on how the values in the monitoring report have been verified;
  - (g) A statement on whether any post-registration changes to the registered PoA-DD or CP-DDs have been approved by the Supervisory Body or notified to the secretariat, respectively, or will be submitted together with the request for issuance of A6.4ERs;
  - (h) An assessment of remaining issues from the previous verification period, if appropriate;
  - (i) Information on quality control within the team and in the verification process;
  - (j) A verification opinion, providing:
    - (i) A summary of the verification method, the process used and the verification criteria applied;
    - (ii) A conclusion on the verified amount of GHG emission reductions or net GHG removals achieved.
320. Where the DOE applied the concept of materiality in planning and conducting verification for the registered A6.4 PoA in accordance with section 9.1.4 above, it shall report:
- (a) The risks, the risk assessment undertaken and how the verification plans and the sampling plans were designed to respond to these risks and ensure that all material errors, omissions or misstatements were detected;
  - (b) Whether and how the verification plans and the sampling plans were revised to take into account the need for further audit procedures due to the nature/type of errors, omissions or misstatements detected;
  - (c) How the concept of materiality was applied in determining whether a detected error, omission or misstatement was material or immaterial either individually or in aggregate.
321. The DOE shall describe all documentation supporting the verification and make it available on request.
322. The DOE shall, based on its verification, certify in writing that some or all of the included CPs in the registered A6.4 PoA achieved the verified amount of GHG emission reductions

or net GHG removals during the specified monitoring period that would not have occurred in the absence of the CPs.<sup>26</sup>

323. If the DOE identifies unavoidable negative impacts that exceed the parameters established in the A6.4 Environmental and social management plan form and the A6.4 Sustainable development impact form and cannot be remediated by consultation or mitigation, the DOE shall issue a negative verification opinion or submit a deviation request to the Supervisory Body prior to submitting a request for issuance.
324. The DOE shall notify the activity participants of the verification outcome, containing:
- (a) A positive verification opinion with a verified amount of GHG emission reductions or net GHG removals, and the date of submission of the verification and certification report as part of the request for issuance of A6.4ERs to the secretariat; or
  - (b) A negative verification opinion, including the reasons for the monitoring results, as documented, having been determined as not complying with the relevant requirements for issuance.

## **10. Validation for renewal of programme of activities period and renewal of crediting period of component projects**

### **10.1. Renewal of programme of activities period**

325. The DOE shall determine whether the activity participants have updated sections of the PoA-DD relating to the eligibility criteria for inclusion of CPs in the A6.4 PoA, the baseline, estimated GHG emission reductions or net GHG removals, the monitoring plan and the PoA period using the valid version of the approved methodologies and, where applicable, the approved standardized baselines and the other methodological regulatory documents that are applicable to the PoA.
326. The DOE shall apply the objectives, approach and means of validation in section 6.1 above, *mutatis mutandis*, when validating for renewal of the PoA period.
327. If the activity participants used a later valid version of the PoA-DD form for the updated PoA-DD than the version of the form of the registered PoA-DD, the DOE shall determine whether the information transferred to the later valid version of the form is materially the same as that in the registered PoA-DD.
328. The DOE shall assess the modalities for setting the baseline for new CPs that may be included in the A6.4 PoA or for updating the baseline for the existing CPs at the renewal of the crediting periods in the new PoA period through an assessment of the correctness of the application of the latest version of the approved methodologies and, where applicable, the approved standardized baselines and the other methodological regulatory documents for the determination of the modalities for setting the baseline or updating it, and estimating GHG emission reductions or net GHG removals for the applicable PoA period.

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<sup>26</sup> The certification report constitutes a request to the Supervisory Body for issuance of A6.4ERs equal to the verified amount of GHG emission reductions or net GHG removals.

329. The DOE shall check that the names of the activity participants included in the updated PoA-DD are consistent with the names of the activity participants in the latest version of the MoC statement.
330. If the activity participants selected another methodology, methodological tool and/or standardized baseline for the purpose of renewal of the PoA period due to the inapplicability of the valid version of the methodology (including a consolidated methodology thereof), methodological tool and/or standardized baseline applied to the registered PoA-DD, the DOE shall assess whether the updated PoA-DD complies with all the requirements of the selected methodology, methodological tool and/or standardized baseline except for additionality demonstration.
331. If the activity participants requested a deviation from the valid version of the methodology (including a consolidated methodology thereof) and/or methodological tool applied in the registered PoA-DD, or from any other selected methodology and/or methodological tool for the purpose of renewal of the PoA period, or if the DOE finds at validation that the updated PoA-DD deviated from the valid version of the methodology and/or methodological tool applied in the registered PoA-DD, or from any other selected methodology and/or methodological tool, paragraph 73 above shall apply, *mutatis mutandis*.
332. If the activity participants requested approval of post-registration changes together with the request for renewal of the PoA period, the DOE shall also validate the post-registration changes in accordance with the relevant requirements in section 8 above and the activity cycle procedure, and shall submit a request for approval of post-registration changes together with the request for renewal of the PoA period in accordance with the relevant requirements in the activity cycle procedure.
333. The DOE shall request the activity participants to provide an updated PoA-DD (with its revised updated generic CP-DD) prepared in accordance with the relevant requirements in the activity standard.
334. The DOE shall prepare a validation report for renewal of the PoA period using the valid version of the applicable validation report form for renewal of the PoA period.
335. In its validation report for renewal of the PoA period, the DOE shall:
- (a) Provide all its applied approaches, findings and conclusions on whether:
    - (i) The updated PoA-DD has been completed using the valid version of the applicable PoA-DD form, following the instructions therein;
    - (ii) The information transferred to the later valid version of the PoA-DD form is materially the same as that in the registered PoA-DD, where applicable;
    - (iii) The methodologies and, where applicable, the standardized baselines and the other methodological regulatory documents were applied in accordance with the applicable requirements in the activity standard;
    - (iv) The modalities for estimating the baseline, estimating GHG emission reductions or net GHG removals, and developing the monitoring plan in the updated PoA-DD comply with the applicable requirements in the activity project standard, and the valid version of the methodologies and, where

applicable, the standardized baselines and the other methodological regulatory documents that are applied in the updated PoA-DD;

- (v) The next PoA period commences on the day immediately after the expiration of the current PoA period;
- (vi) The names of the activity participants in the updated PoA-DD are consistent with the names of the activity participants in the latest version of the MoC statement;
- (b) Report on all items listed in paragraph 120 above except for its subparagraph 120(g) above;
- (c) Follow paragraphs 115–117 above, *mutatis mutandis*, on its validation opinion;
- (d) Provide a statement on whether any proposed post-registration changes for the next PoA period will be submitted together with the request for renewal of the PoA period.

## **10.2. Renewal of crediting period of component project activities**

### **10.2.1. General requirements**

#### **10.2.1.1. Overarching requirement**

336. The DOE shall determine whether the activity participants have updated the CP-DD in accordance with the relevant requirements for renewal of the crediting period in the activity standard.

#### **10.2.1.2. Other requirement**

337. If the activity participants used a later valid version of the CP-DD form for the updated CP-DD than the version of the form of the registered CP-DD, the DOE shall determine whether the information transferred to the later valid version of the form is materially the same as that in the registered CP-DD.

## **10.3. Validation of compliance with specific requirements for renewal**

### **10.3.1. General**

338. The DOE shall determine whether the activity participants have updated sections of the CP-DD relating to the demonstration of eligibility for being included in the A6.4 PoA, the baseline, estimated GHG emission reductions or net GHG removals, the monitoring plan and the crediting period in accordance with the generic CP in the latest version of the PoA-DD.
339. The DOE shall determine, by following the general validation requirements referred to in section 7.1 above, *mutatis mutandis*, whether the proposed renewal of the crediting period of an included CP complies with all relevant requirements for renewal contained in the activity standard, including the requirements on:
- (a) Application of valid version of the methodologies and methodological tools;
  - (b) Application of an approved standardized baseline;

- (c) Validity of the original baseline or its update;
- (d) Update of the BAU scenario and emissions, the baseline scenario and emissions, and the difference between the baseline and BAU emissions;
- (e) Update of the downwards adjustment;
- (f) Update of the regulatory analysis for the additionality;
- (g) Update of the estimated GHG emissions and net GHG removals (if applicable);
- (h) Update of the monitoring plan (if applicable);
- (i) Update of the A6.4 SD Tool forms;
- (j) Updated risk assessment and monitoring plan for component projects involving removals and emission reduction component projects with reversal risks;
- (k) Update of the crediting period;
- (l) Update of MoC statement;
- (m) Combination of post-registration changes at renewal, if applicable.

### **10.3.2. Application of valid version of the methodologies and methodological tools**

340. If the activity participants selected another methodology, methodological tool and/or standardized baseline for the purpose of renewal of the crediting period of the included CP due to the inapplicability of the valid version of the methodology (including a consolidated methodology thereof), methodological tool and/or standardized baseline applied to the registered CP-DD, the DOE shall assess whether the updated CP-DD complies with all the requirements of the selected methodology, methodological tool and/or standardized baseline.
341. If the activity participants deviated from the valid version of the methodology (including a consolidated methodology thereof) and/or methodological tool applied to the registered CP-DD, or from any other selected methodology and/or methodological tool for the purpose of renewal of the crediting period of the included CP, section 7.6.1 above shall apply, *mutatis mutandis*.

### **10.3.3. Validity of original baseline or its update**

342. The DOE shall assess the validity of the original baseline or its update through an assessment of the following issues:
- (a) The modalities for setting the baseline described in the generic CP-DD in the latest version of the PoA-DD applicable for the valid PoA period for the purpose of inclusion of new corresponding CPs and renewal of the crediting period of existing corresponding CPs;
  - (b) The correctness of the application of the approved methodologies and, where applicable, the approved standardized baselines and the other methodological regulatory documents for the determination of the continued validity of the baseline or its update, and the estimation of GHG emission reductions or net GHG removals for the applicable crediting period of the included CP.

343. The requirement contained in paragraph 342 above shall not apply to an included CP applying the valid version of an applicable approved standardized baseline that standardizes the baseline scenario.

#### **10.3.4. Combination of post-registration changes at renewal**

344. If the activity participants wish to combine post-registration changes with the renewal of the crediting period of the included CP, the DOE shall also validate the post-registration changes in accordance with the relevant requirements in section 8 above and the activity cycle procedure, and shall notify the secretariat of the post-registration changes together with the renewal of the crediting period of the CP in accordance with the relevant requirements in the activity cycle procedure.

#### **10.4. Validation report**

345. In its validation report for renewal of the crediting period, the DOE shall:
- (a) Report on all items listed in paragraph 120 above except for its subparagraph 120(e) above;
  - (b) Provide all its applied approaches, findings and conclusions on the assessment of:
    - (i) Whether the revised CP-DD is prepared using the valid version of the applicable form and following the instructions therein, as applicable;
    - (ii) The compliance of the updated project design with the requirements for renewal of the crediting period conducted in accordance with sections 10.1–10.3 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them;
  - (c) State whether there are any proposed post-registration changes effective from the start date of the next crediting period in the notification of renewal of the crediting period of the included CP, and if the validation is primarily for the latter.

## **Appendix 1. Guidance on remote inspection as an alternative means to an on-site inspection**

1. In this document, a remote inspection for the purpose of validation or verification refers to the component projects (CPs) for which the validation or verification team of the designated operational entity (DOE) carries out the same activities as in a physical on-site inspection through information and communication technology (ICT) tools.
2. There are risks posed by remote inspections, including in the use of ICT tools. In order to ensure a level of assurance of the validation or verification that is comparable to the level of an on-site inspection, there needs to be measures in place to reduce these risks.
3. The DOE should identify risks pertaining to the remote inspection for each validation or verification activity and establish and implement measures to eliminate or reduce those risks. A DOE should also integrate this risk assessment process into its quality management systems.
4. The DOE should implement the following actions at different stages of a validation or verification activity:
  - (a) Risk assessment stage: The feasibility of conducting a remote inspection depends on the risk level and whether measures to eliminate or reduce the risks are adequate for the validation or verification. Therefore, a risk assessment to be conducted by the DOE should cover the following aspects:
    - (i) Identifying and assessing the risks inherent in a remote inspection. The risks may be at different levels and could cover different aspects; hence the risk identification and assessment should cover:
      - a. Risks related to organizational and procedural aspects, which include generic risks. These risks could relate to the following: the quality of the Internet connection; the quality of ICT tools such as good camerawork to ensure a reasonably good view for the validation or verification team; the amount of documentation to be reviewed remotely; whether relevant data flows can be accessed remotely; the record-keeping system established; the maintaining of confidentiality and personnel data protection; and the required competence and resources of the validation or verification team;
      - b. Risks related to the project and its configuration, which present project-specific risks. The risks could relate to the following: whether the boundary and features of the project can be evaluated remotely; whether the remote inspection would enable the DOE to observe any sources of emissions that are not included in the project; how control activities are carried out; and how calculations are tracked and cross-checked;
      - c. Risks related to monitoring aspects. The risks could relate to the following: the complexity of the monitoring parameters and the monitoring plan; data processing and reporting; whether a fiscal metering method is applied; the sampling or surveys conducted at household level; the status of the monitoring period being verified;

and whether data and information have been thoroughly checked during previous verifications or whether such data and information can be checked subsequently without an on-site inspection;

- (ii) Establishing measures to eliminate or reduce the identified risks. The DOE should establish measures to eliminate or reduce each identified risk at the different levels described in subparagraph (i) above;
  - (iii) The risk assessment pertaining to the remote inspection may be undertaken in the context of the application of materiality following the relevant provisions in this standard;
- (b) Planning stage: Based on risk assessment outcomes, the DOE should plan the validation or verification activity as follows:
  - (i) Composing a validation or verification team with sufficient members that have the knowledge, skill and solid professional judgment required in an on-site inspection in conjunction with additional competence in applying ICT tools;
  - (ii) Conducting a desk review to gain a prior understanding of records and documentation control processes of the activity participants;
  - (iii) Establishing a validation or verification plan to clearly define the tasks to be performed during the remote inspection, taking into account the established measures to eliminate or reduce the identified risks. This includes a detailed allocation of responsibilities by different validation or verification team members with the required knowledge and specific time zones to ensure the team members audit separately and make the best use of time;
  - (iv) Determining ICT tools to be used with the activity participants and conducting a test on the agreed ICT tools before the remote inspection to ensure that there is a stable connection and understanding of how to use such ICT tools. The DOE should also ensure that there is a backup plan in case there is a connection issue;
- (c) Implementation stage: During the remote inspection, the DOE should implement measures it has established to mitigate the identified risks, while conducting the validation or verification following the relevant requirements of this standard. At this stage, the DOE may decide to extend or terminate the remote inspection if it finds during the remote inspection that the actual risks are higher than initially assessed.
- (d) Post-remote inspection stage: The DOE should:
  - (i) Assess whether another round of remote inspection is needed while reviewing the activity participants' response to clarification requests, corrective action requests and/or forward action requests;
  - (ii) Ensure that its technical review process is able to identify any risks that were not identified during the risk assessment stage.



## Appendix 2. Calibration

1. This Appendix provides an illustrative example for applying the provisions in paragraph 301(a) and (b) of this standard.
2. An electricity energy meter with a maximum permissible error ( $\pm 5$  per cent), which may be used for measuring the electricity export for baseline emissions and electricity import for project emission calculations, is required to be calibrated every year. If the calibration is delayed and instead of after one year it is conducted after one and a half years, and the result of the delayed calibration is available at the time of verification, to account for the delayed calibration the measured values shall be corrected as demonstrated in Table 1 and Table 2 below for situations stipulated in paragraph 301(a) and (b) of this standard.

**Table 1. Sample calculation for the cases where the error identified in the delayed calibration is smaller than the maximum permissible error**

Measured value	Parameter	Error identified during delayed calibration	Corrected values
100 MWh	Electricity export	$\pm 2\%$	$100 (1 - \text{max. permissible error}\%/100) = 95 \text{ MWh}$
100 MWh	Electricity import	$\pm 2\%$	$100 (1 + \text{max. permissible error}\%/100) = 105 \text{ MWh}$

**Table 2. Sample calculation for the cases where the error identified in the delayed calibration is larger than the maximum permissible error**

Measured value	Parameter	Error identified during delayed calibration	Corrected values
100 MWh	Electricity export	$\pm 7\%$	$100 (1 - \text{error}\%/100) = 93 \text{ MWh}$
100 MWh	Electricity import	$\pm 7\%$	$100 (1 + \text{error}\%/100) = 107 \text{ MWh}$

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