

From: Veda Climate Change Solutions Ltd. <[REDACTED]>

Sent: Tuesday, 22 September, 2026 19:00

To: A6.4mechanism-info <A6.4mechanism-info@unfccc.int>

Cc: [REDACTED]
[REDACTED]

Subject: Public Input Sought Ahead of Supervisory Body Meeting in Bonn- Submission by VEDA Climate Change Solutions Ltd, Project developer of UNFCCC registered CDM Project Id.4531.

To

The Subsidiary Body for the mechanism established by the Article 6.4 of the Paris Agreement

UNFCCC

Dear Sir / Ma'am,

With reference to UNFCCC's email dated 22 September, 2026 seeking public inputs, herewith I provide my inputs on the agenda item "Revised procedure for the transition of Clean Development Mechanism activities to the PACM' for the SBM023.

It is not appropriate for the UNFCCC to make Host Country Approval (HCA) mandatory for transition to Article 6 of the Paris Agreement(PA) even for the CDM projects which have earlier received the HCA on the basis of which UNFCCC registered the projects with a project period of 2030 and beyond. Since the earlier UNFCCC registered CDM projects are to be transitioned to A6 of the PA, the transition should be seamless and seeking the HCA once again seems superfluous.

The UNFCCC can not go back on its own commitments made through registration of projects earlier under Kyoto protocol particularly in those countries which are signatories to both Kyoto Protocol and Paris Agreement.

The insistence on HCA once again for transition to A6 of the PA amounts to social and climate injustice as the farmers and other stakeholders who are participants of earlier

UNFCCC registered CDM projects will be denied carbon revenues for no fault of theirs for the remaining period of the CDM projects registered by UNFCCC itself.

To cite an example, I would inform you that the Ministry of Environment, Forests and Climate Change, Government of India which is the Designated National Authority (DNA) for India has accorded the Host Country approval to the UNFCCC registered A/R CDM project (<https://cdm.unfccc.int/Projects/DB/TUEV-SUED1298895593.56/view>) which has delivered carbon revenue twice to the participating farmers after two successful verifications and is being successfully implemented. The above CDM Project was accorded HCA vide its F.No.4/2/2006-CCC dated 15 July 2009 (copy enclosed) on the basis of which the UNFCCC has registered the A/R CDM project for the project period upto 2034.

Consequent to the registration of the project by the UNFCCC based on the HCA given by the MoEF&CC, more than 1590 farmers have been onboarded to the CDM Project with the promise that they would receive the carbon revenue till 2034 and the participating smallholders joined the project with the same expectation.

Further, under the UNFCCC registered project, an Emission Reduction Purchase Agreement (ERPA) with The World Bank has been entered and the 1590 participating farmers of this innovative project received carbon revenue from the sale of tCERs for the first time in India after first verification in 2012 (<https://documents1.worldbank.org/curated/en/635021468283451706/pdf/4346700PID1AP1ORissa1agro1forestry1final.pdf>).

Subsequently, the UNFCCC CDM Board had issued 62,756 CERs on 18 March, 2020 after second verification and the carbon revenue was distributed once again to the participating farmers of this unique project in an event held on 22 March, 2022 at Visakhapatnam. Placed below are the links to the press coverage and a copy of the news item published in the Times of India on 24th March, 2022 along with a few pictures of the event. A couple brochures on the project are also enclosed herewith for your information.

<https://epaper.bizzbuzz.news/Home/MShareArticle?OrgId=243a3b32048>

<https://timesofindia.indiatimes.com/city/visakhapatnam/ap-farmers-reap-carbon-credits-from-agriculture/articleshow/90407365.cms>.

In this regard, the UNFCCC's CDM Team informed vide its email that "the transition request for CDM PA 4531 has completed the global stakeholder consultation and is now publicly available on the UNFCCC

website: https://cdm.unfccc.int/transition/finalized_gsc with excel sheet containing the list of approved projects globally which include the project from India with No.

4531 and the transition is pending approval by the Host Party".

In this regard, you will be interested to know that the Agriculture, Forestry and Other Land Use (AFOLU) sectors have been excluded vide OM dated 7th June 2024 of MoEF, Govt. of India (copy attached) which is not in conformity with the statement made by the Hon'ble Prime Minister in his keynote address at UN "High-Level Dialogue on Desertification, Land Degradation & Drought" on 14 June, 2021, committing India's NDC to creating an additional carbon sink of 2.5–3 billion tonnes of CO₂-equivalent by 2030 through enhancing climate resilience by adoption of restoration of degraded lands and sustainable land-use practices. You will appreciate that the same can not be achieved by excluding AFOLU sectors which play a crucial role in meeting these targets by sequestering carbon through afforestation, reforestation and sustainable forest management to enhance carbon storage potential.

Impressing upon the importance of AFOLU sectors in India's development process, I have already brought this surprised omission to the notice of the Hon'ble Prime Minister of India, Hon'ble Union Minister of Environment, Forests and Climate Change(MoEF&CC) and other senior officials of the Government of India to include the AFOLU sectors in the list of activities finalised under Article 6.4 Mechanism of the Paris Agreement to help achieve India's NDCs while contributing to achieve UNSDGs in view of the critical role played by AFOLU sectors in the mitigation and adaptation of climate change in the Indian context.

In this context, if the UNFCCC insists on the HCA again to the ongoing UNFCCC registered CDM Project which is being successfully implemented, the project may have to be discontinued which may send wrong signals to the international community as well as to the millions of smallholders who join such projects with the anticipation of the promised carbon revenues for the entire project period.

Hence, I would request the UNFCCC to look into this issue from the point of view of the smallholder farmers who are hit the hardest by climate change and request it to not

to make HCA mandatory for the CDM projects which have already received the HCA to allow them to continue for the remaining period of the crediting period. It may not be appropriate to seek the HCA again for transition to Article 6.4 when the project was registered under the CDM based on the HCA only.

The transition from the CDM to Article 6 of the Paris Agreement should be smooth and should not put the expectations of the small farmers at risk. You will appreciate that the policies framed by the international organisations and national governments should aim at benefitting the smallholder farmers and other vulnerable sections but should not adversely affect them and discourage them from participating in international initiatives such as the Paris Agreement aimed to address the twin challenges of climate change mitigation and enhancing livelihoods.

If necessary, you may like to refer the matter to the legal cell of the UNFCCC secretariat, UN Global Compact, UN Human Rights Commission etc for an opinion on the matter and may like to establish a grievance redressal mechanism within UNFCCC to the smallholder farmers who would be denied carbon revenues though they have been onboarded in conformity with the project period of the Project registered by the UNFCCC.

Further, I have already requested the Ministry of Environment, Forests and Climate Change, Government of India to reconsider the issue of exclusion of AFOLU sectors from the implementation of Article 6.4 of the Paris Agreement by the Indian DNA/ NDA putting at risk the commitments made to smallholder farmers and also the UN SDGs.

In this regard, herewith I share my article **published in The Indian Express: "*India's Climate Policy Must Not Leave Farmers Behind*"**
<<https://indianexpress.com/article/opinion/columns/indias-climate-policy-must-not-leave-farmers-behind-10338538/>> for your information (copy attached).

Hence, I would request the Article 6.4 Supervisory Body to consider this contentious issue in its SBM023 and its guidance and support will be very much appreciated to ensure climate and social justice.

I am happy to provide any further information/clarification and request an opportunity of being heard representing the voice of the poor smallholder farmers who are the most affected due to the decisions taken by the UNFCCC and the national governments for transition of the CDM projects to PACM.

Many thanks for your kind consideration.

Look forward to hearing from you.

Best regards

Satyanarayana

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