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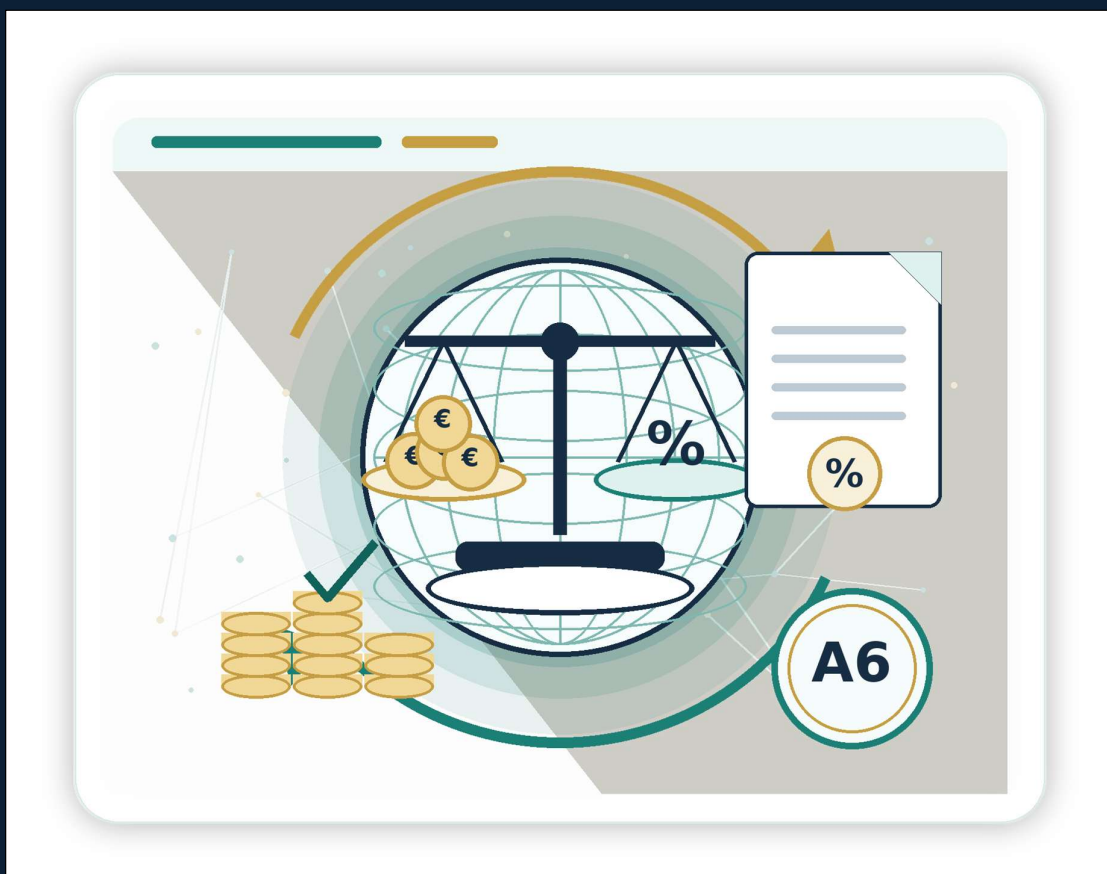


RCC Latin America
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RCC Caribbean
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Fees and Levies under Article 6



2026



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Abbreviations

A6.4ER	Article 6.4 emission reduction
BTR	Biennial Transparency Report
CMA	Conference of the Parties serving as the meeting of the Parties to the Paris Agreement [at its sixth session]
DNA	Designated national authority
ETF	Enhanced transparency framework (under the Paris Agreement)
ICP	Independent crediting programme
IR/UIR	Initial report/Updated initial report
ITMO	Internationally transferred mitigation outcome
Lao PDR	Lao People's Democratic Republic
LoA	Letter of authorization
MADD	Mitigation activity design document
MAIN	Mitigation activity idea note
MCU	Mitigation contribution unit
MRV	Monitoring, reporting and verification
NDC	Nationally determined contribution
OIMP	Other international mitigation Purpose
OMGE	Overall mitigation in global emissions
PACM	Paris Agreement Crediting Mechanism
PDD	Project design document
PIN	Project idea note
SOP	Share of proceeds
UNFCCC	United Nations Framework Convention on Climate Change
VCM	Voluntary carbon market
VCS	Verified carbon standard
VPA	Voluntary project activity

Definitions

Adaptation levy (domestic)	A national-level charge on mitigation outcomes or revenues that channels resources toward domestic adaptation priorities.
Administrative fee	A charge applied by a host Party to recover the administrative costs of managing cooperative approaches, including authorization, registry operation, monitoring, reporting and verification (MRV) oversight, and reporting.
Authorization fee	A fee charged by a host Party to process a request for authorization of mitigation outcomes.
Benefit-sharing levy	A mechanism that allocates a share of revenues generated from carbon market activities to beneficiaries, such as local communities and subnational governments, as well as to national environmental funds and other financing vehicles.
Corresponding adjustment fee	A policy-based fee that internalizes the domestic opportunity cost of transferring mitigation outcomes internationally rather than applying them toward the host Party's nationally determined contribution (NDC).
Share of proceeds (SOP) for adaptation	A 5 per cent deduction from issued Article 6.4 emission reductions (A6.4ERs) (or an equivalent monetary amount, depending on the stage) used to assist developing country Parties that are particularly vulnerable to the adverse effects of climate change by providing resources to the Adaptation Fund.

Consult the [Article 6.4 glossary](#) for additional definitions.¹

¹ <https://unfccc.int/sites/default/files/resource/A6.4-Glossary.pdf>

Introduction

Article 6 of the Paris Agreement establishes a framework for international carbon market participation, encompassing cooperative approaches under Article 6.2 and the centralized Paris Agreement Crediting Mechanism (PACM) under Article 6.4. Article 6.2 provides the tracking, accounting and transparency framework that enables unilateral, bilateral/plurilateral and multilateral arrangements for the generation and international transfer of mitigation outcomes, subject to agreed accounting, reporting and transparency requirements (figure 1). Mitigation outcomes authorized for use toward another Party's nationally determined contribution (NDC), and/or other international mitigation purposes (OIMP) become internationally transferred mitigation outcomes (ITMOs). Article 6.2 cooperative approaches can be linked to independent crediting programmes (ICPs), including the PACM. These programmes facilitate the issuance and tracking of ITMOs and may include programme-specific fees, levies and procedural requirements. Article 6.4 establishes the PACM as a centralized international crediting mechanism operating under the authority of the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), with standardized rules, methodologies and oversight. Emission reductions and removals issued under the PACM fall within the scope of Article 6.2 when they are authorized by the host Party for use towards achievement of NDCs and/or OIMP as ITMOs.

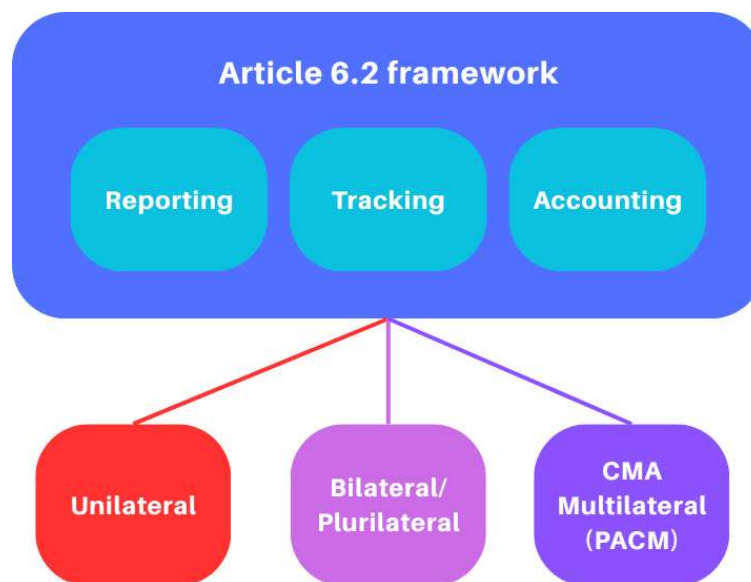


Figure 1: Article 6.2 tracking, accounting and transparency framework

In public finance, fees are payments for specific services or privileges, typically linked to the cost of providing those services. Levies are broader charges that may include policy-driven contributions, earmarked revenues, or instruments used to influence behaviour and finance public goods. In the context of Article 6, fees primarily refer to administrative charges



associated with service provision or cost recovery. These charges may include processing applications, issuing authorizations, operating registries or overseeing monitoring and reporting. In contrast, levies are redistributive or policy-oriented instruments that channel a share of carbon market value toward adaptation, community benefit-sharing, or enhanced ambition. Each instrument serves a distinct policy function and is embedded in different parts of national fiscal and climate governance systems. For consistency, this information note uses the term “charges” when referring generically to costs imposed by host Parties participating in Article 6.

Within Article 6 implementation, these instruments reveal a broader spectrum of potential benefits beyond cost recovery. Administrative fees sustain governance functions, enabling host Parties to maintain reliable oversight, robust monitoring, reporting and verification (MRV), and efficient registry operations. Levies can mobilize resources for adaptation, institutional strengthening, innovation, or local development, contributing to a pathway towards low greenhouse gas emissions and climate-resilient development in line with Article 2.1(c) of the Paris Agreement. They also generate non-monetary gains, including stronger domestic ownership, enhanced stakeholder participation, and improved data and reporting systems. Fees and levies may act as strategic levers through which governments reinforce long-term mitigation ambition and sustainable development pathways, while ensuring that participation in cooperative approaches remains institutionally sustainable and socially legitimate.

As illustrated in figure 2, mitigation outcomes can be issued through different mechanisms, including the PACM and other ICPs, and may or may not be authorized for international transfer. This distinction is central to understanding how fees and levies apply. When authorized, units become ITMOs and are subject to corresponding adjustments, which trigger a distinct set of charges, such as authorization fees, which recover administrative costs, and corresponding adjustment fees, which internalize the opportunity cost of exporting mitigation outcomes abroad. Units that are not authorized for use towards the achievement of NDCs of Parties and/or for OIMP, including mitigation contribution Article 6.4 emission reductions (A6.4ERs) or mitigation contribution units (MCUs) under the PACM, or ICP units, remain within the host Party’s NDC accounting framework. While these units do not trigger international accounting obligations, they may still be subject to domestic regulatory oversight and associated charges, such as administrative fees or benefit-sharing levies. The fees and levies examined in this information note therefore apply across both categories, although their

rationale, trigger points and governance implications differ depending on whether a corresponding adjustment is applied.

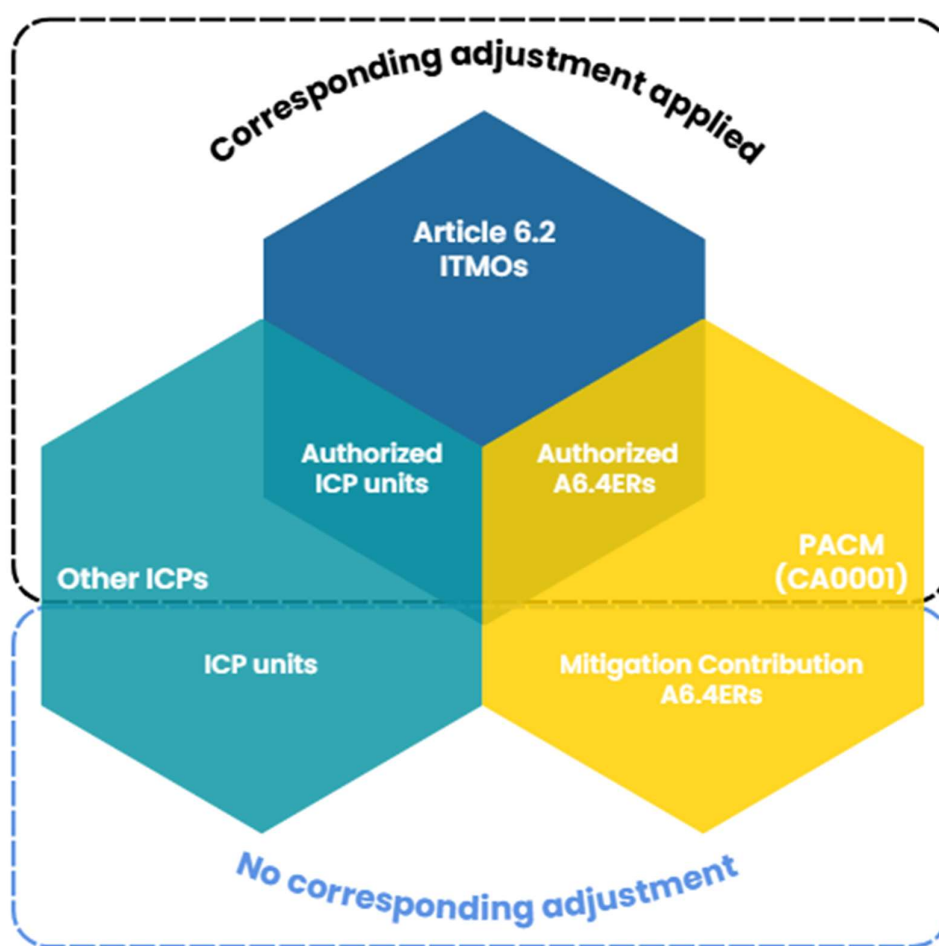


Figure 2: Mitigation outcome units by authorization status and issuing mechanism

It is also important to account for the different reporting and review costs associated with Article 6.2 cooperative approaches compared to the centralized multilateral processes under the PACM. Article 6.2 requires Parties to maintain their own arrangements for reporting, review and tracking, which can create higher recurrent administrative costs. Where host Parties authorize mitigation outcomes across multiple ICPs, each project may constitute a separate cooperative approach and require distinct reporting and tracking processes. This results in multiple Part IV sections in the Initial Report or Updated Initial Report (IR/UIR) and multiple Part VI entries under Annex IV of the Biennial Transparency Report (BTR). In contrast, participation in the PACM benefits from a centralized framework, including standardized reporting formats, pre-filled Agreed Electronic Format tables, consolidated review processes, and a single cooperative approach identifier (CA0001). As a result, host Parties authorizing



PACM units report under one cooperative approach, requiring only one Part IV IR/UIR and one Part VI BTR entry, which reduces reporting complexity and administrative burden. These differences influence how host Parties calibrate domestic fees and levies to reflect their administrative costs.

This information note aims to clarify the range of fees and levies that may arise in the context of cooperative approaches under Article 6.2, including how domestic instruments interact with charges imposed by ICPs and related administrative arrangements. It documents emerging country practices and observed design choices. It does not provide guidance or recommendations, nor does it prescribe specific fee or levy levels. References to design features or outcomes are descriptive and analytical and should not be interpreted as prescriptive guidance. By describing existing international requirements, emerging national practices, and observed design options, the note supports Parties and stakeholders in understanding possible approaches to national fee and levy systems and their implications for revenue needs, market competitiveness and environmental integrity.

To structure the analysis, the information note first examines strategic considerations for host Parties, including the legal nature of carbon credits and the balance between revenue generation and market competitiveness. It then examines how fees and levies apply across the full range of mitigation outcomes, distinguishing between charges on non-adjusted units, grounded in domestic regulatory oversight, and charges on adjusted units linked to authorization and international transfer. The note also examines charges applied by ICPs, which form an exogenous cost layer that domestic fee design must account for. It concludes by identifying emerging trends and practical options observed in early implementation experience, rather than recommending specific policy choices.

1. Strategic considerations for host Parties

Participation in international carbon markets under Article 6.2 involves deliberate design choices determining how revenues are generated, allocated and governed. Rather than functioning solely as administrative tools, fees and levies play a structuring role in shaping incentives and aligning international cooperation with national climate priorities.

Engaging with carbon markets inherently entails exposure to fees and levies at different stages of the activity cycle. These cost structures shape domestic decisions on whether and how to introduce national charges to recover administrative costs, support adaptation or development objectives, or govern the authorization and transfer of mitigation outcomes. Poorly calibrated charges can weaken competitiveness and deter investment, while well-designed mechanisms can reinforce national ownership, transparency, and climate ambition. Pricing choices therefore require careful calibration, flexibility over time, and consideration of opportunity costs to preserve market viability and safeguard NDC achievement.

Participation in Article 6.2 cooperative approaches entails substantive and ongoing administrative and reporting obligations for host Parties, as set out in decision 2/CMA.3. These include the establishment and operation of authorization procedures for ITMOs, the application and tracking the progress towards achievement of NDCs, the maintenance of national records or access to registries for tracking purposes and reporting through BTRs. These obligations are systemic rather than project-specific in nature, generating recurrent administrative costs that persist regardless of project scale and may increase as transaction volumes and the number of participating activities expand. In practice, Parties must establish and maintain institutional arrangements, data management systems, and inter-ministerial coordination processes to ensure consistency between authorization decisions, national greenhouse gas inventories, and international reporting under the Enhanced Transparency Framework under the Paris Agreement (ETF).

An increasing number of host Parties are therefore setting fees and levies for three main reasons: (i) to recover fixed, recurrent governance costs arising from Article 6.2 participation (authorization workflows, registry/records access, corresponding adjustment accounting, and reporting under Article 6 and Article 13); (ii) to internalize the opportunity cost of exporting mitigation outcomes and fund ambition-raising measures through clearly earmarked instruments; and (iii) to establish predictable, transparent rules that reinforce national



ownership, complement programme-level charges from ICPs, and reduce reliance on ad hoc negotiation, thereby strengthening market confidence.

In contrast, the PACM incorporates centralized and standardized design features to reduce administrative burdens at the national level, as established in decision 3/CMA.3 and decision 7/CMA.4 and further elaborated through Supervisory Body standards governing the PACM activity cycle. These include: mechanism-level methodologies and standardized baselines; harmonized procedures for registration, monitoring, verification, and issuance; a UNFCCC-hosted mechanism registry for issuance, tracking and cancellation, first transfer of A6.4ERs with ETF-aligned reporting, and centralized grievance, appeals and safeguard frameworks. As a result, host Parties are not required to establish parallel national systems for project-level credit issuance and tracking. While Parties retain responsibilities related to authorization, corresponding adjustments, and reporting under the transparency framework, the PACM architecture reduces project-level administrative and accounting requirements at the national level. From a domestic fee design perspective, these structural features reduce the level of national administrative effort required for PACM participation compared to decentralized Article 6.2 cooperative approaches. As a result, they influence both the level and justification of domestic administrative fees.

This section examines two interrelated dimensions that shape how host Parties design and implement fees and levies. First, it addresses the legal nature of carbon credits, explaining how their classification determines who pays fees, who receives revenues, and how charges are structured. Second, it explores how host Parties balance revenue generation with competitiveness.

1.1. Legal nature of carbon credits

The legal nature of carbon credits refers to whether they are treated as intangible property, contractual rights, or regulatory permits under domestic law. In many jurisdictions, this legal status remains unclear, creating legal uncertainty that increases transaction costs, deters investment, and complicates cross-border transfers (Alves et al., 2025).

Carbon credits can generally be classified under three legal models, summarized in table 1. These legal models shape the design of fees and levies, as they determine the fiscal implications and administrative approaches applicable in different contexts.

Table 1: *Legal models of carbon credits and their fiscal implications*

Model	Description	Fiscal Implication
Property	Treated as intangible property, fully transferable and enforceable	Royalties or benefit-sharing possible
Contractual rights	Defined by agreement between parties, limited enforceability	Charges usually cover administrative costs
Regulatory permits	Defined under compliance frameworks, tradable only within regulations	Fees tied to issuance, registration or authorization

These models shape ownership, transferability and enforceability, which in turn influence who pays fees, who receives revenues, and which institutions manage allocation. As a result, the design and incidence of domestic charges are contingent on the legal ownership of the underlying carbon assets. For example, when the state owns credits, as in Benin, Malawi and Suriname, levies function as sovereign charges rather than regulatory cost-recovery instruments (Ministry of Natural Resources and Climate Change of Malawi, 2025; République du Bénin; Suriname, 2024). In contexts of shared ownership between governments and private actors, as in Cambodia, authorities structure authorization fees and benefit-sharing arrangements to include communities and private entities (Cambodia, 2024). Establishing clear domestic legal frameworks is therefore a priority in order to reduce uncertainty and support market confidence.

When designing fees and levies, it is important to provide both qualitative and quantitative definitions to ensure clarity, predictability and competitiveness. Quantitative definitions establish the numerical structure of charges, such as fixed amounts, percentages, or formulas applied to specific transactions. For example, Malawi sets a share of revenues from the activity at 25 per cent for nature-based projects on public protected land and 15 per cent for projects on customary land (Ministry of Natural Resources and Climate Change of Malawi, 2025). These numerical parameters enable market participants to internalize costs ex-ante and assess project viability.

Qualitative definitions describe the scope and conditions under which fees and levies apply, specifying what is charged, when, where, and by whom, and distinguishing between domestic and international transactions. Malawi's framework illustrates this by differentiating fees based on land classification (public protected versus customary land) and technology type, thereby signaling policy priorities and guiding investor expectations (Ministry of Natural Resources and Climate Change of Malawi, 2025). Regulations may also clarify the types of fees



applicable at different stages of the carbon market cycle, such as registration, authorization, issuance and transfer, and outline how charges vary by project type and scale.

Together, these definitions offer clarity and predictability, enabling activity participants to evaluate costs and minimizing uncertainty that could hinder engagement. Complementary design features, such as periodic review or indexation to inflation, linking fee structures to benefit-sharing or earmarking rules, and ensuring public disclosure of revenue use, strengthen accountability, reinforce equity and maintain fiscal realism. Without these elements, carbon market participation risks becoming fragmented, inefficient or disproportionately benefiting activity participants at the expense of national climate objectives.

Regulatory instruments such as decrees, budget laws and other frameworks are essential for the formalization of revenue collection, allocation and reporting. These instruments must align with existing fiscal and environmental regulations to ensure enforceability and coherence, and they reflect national governance arrangements and the balance of legal authority. Country practice shows that these fees are established through a combination of legislative and executive measures, reflecting national governance arrangements and the balance of legal authority. In some jurisdictions, fees are incorporated into primary legislation, as in Uganda's National Climate Change Act (2021). More frequently, they are established through subsidiary legislation or regulations, as in Tanzania (2022), Kenya (2024), and Zimbabwe (2025), where enabling Acts establish overarching frameworks that delineate fee structures, applications, and enforcement mechanisms.

In other countries, executive instruments such as decrees, manuals or policy frameworks are used. Benin and Congo have issued presidential decrees to define registration fees and carbon rights; Cambodia has formalized fees through an Article 6 Operations Manual; and Ghana and Rwanda have used Cabinet-approved frameworks integrated with existing laws. In some jurisdictions, such as Nigeria, policy blueprints are being developed as precursors to future legislation. Across these approaches, the choice of instrument reflects a balance between legal certainty, operational detail, and administrative flexibility, influencing enforceability, transparency, and predictability of fee collection while allowing for adaptation to evolving carbon market requirements.

1.2. Balancing revenue generation with competitiveness

Defining the appropriate level of fees and levies requires reconciling revenue generation with market competitiveness. Host Parties must balance the recovery of administrative and



regulatory costs against pricing signals that discourage participation or suppress demand for credits. Pricing decisions are best informed by broader market and ambition strategies, recognizing that the way credits are authorized and priced influences both authorization behaviour and the mitigation of overselling risk (World Bank, 2025). These prices not only affect competitiveness but also influence authorization behaviour, transfer volumes, and the integrity of the NDC. Consequently, fees that are moderate, transparent and predictable enhance credibility and attract buyers, whereas inflexible or excessive charges can deter investment and reduce competitiveness.

Conceptually, balancing revenue with competitiveness requires a pricing framework that links revenue collection and governance objectives to the host Party's positioning in international carbon markets. This entails differentiating administrative fees aimed at cost recovery and institutional sustainability from policy-driven levies designed to internalize opportunity cost or mobilize resources for adaptation and development, while maintaining flexibility to revise these instruments as market conditions evolve. The optimal balance is dynamic and context-specific: underpricing undermines fiscal and environmental goals, while overpricing risks marginalizing the host Party or diverting demand toward competing jurisdictions with lower transaction costs.

Countries have adopted different approaches to balance revenue generation with competitiveness, reflecting a deliberate effort to avoid undermining the attractiveness of ITMOs. Ghana applies a corresponding adjustment fee of USD 3 to USD 5 per ITMO, designed to reinforce national climate ambition without discouraging buyers. The allocation of proceeds is explicitly structured, with 90 per cent reinvested in additional mitigation efforts and the remaining 10 per cent covering administrative costs, signaling an intent to maintain market viability (Ghana, 2022). In Malawi, projects face administrative fees and a corresponding adjustment fee of USD 4 per unit, calibrated to preserve economic viability for communities and the region (Ministry of Natural Resources and Climate Change of Malawi). Additionally, projects using public assets, such as forests, lakes and national parks, are subject to upfront and annual valuation-based fees. These fees provide a stable revenue stream while keeping projects attractive to private developers (Ministry of Natural Resources and Climate Change of Malawi, 2025). Côte d'Ivoire allows for bilateral fee arrangements under Article 6.2 cooperation agreements, giving authorities flexibility to tailor financial terms, complemented by penalties, sanctions and an appeal mechanism administered by the Conseil de Supervision (Ministère de l'Environnement, 2024). This combination of differentiated, predictable and accountable



mechanisms helps generate revenue while maintaining market credibility and investor confidence.

By combining transparency, flexibility and legal or institutional clarity, such as valuation-based fees or tailored bilateral arrangements, Parties can mobilize resources while sustaining competitiveness and aligning revenue collection with national climate and development objectives.

2. Use of fees and levies imposed by host Parties

As host Parties advance cooperative approaches under Article 6.2, many fee and levy structures and revenue mechanisms go beyond the charges established by ICPs. These additional charges reflect a broader strategic intent: they are not only about compliance, but also about aligning carbon market participation with national climate priorities, development goals, and institutional settings. Notably, these instruments are applied across a wider set of mitigation outcomes, including both authorized and non-authorized units, underscoring the expanding role of domestic governance in shaping carbon market participation.

These revenues serve multiple, interrelated purposes. From an economic perspective, Article 6.2 fees and levies contribute to the financial sustainability of domestic carbon market governance by covering administrative costs, including registry operations, validation and oversight. From an environmental standpoint, revenues can be allocated to initiatives that ensure the integrity of the NDC, provide support for adaptation financing, or fund increased emission reduction efforts, thereby reinforcing environmental ambition and public legitimacy. From political and social standpoints, the equitable distribution of revenues, whether for the purpose of compensating vulnerable groups or reinforcing institutional capacity, has been demonstrated to enhance acceptability and cultivate trust in governance frameworks (Klenert et al., 2018).

Table 2 summarizes the distinct roles of Article 6.2 fees and levies discussed in this section.

Table 2: Typology of instruments in Article 6.2 governance.

Instrument	Purpose
Administrative fees	Cost recovery for services such as project registration, issuance, authorization and registry operations
Corresponding adjustment fees	Monetary charges applied to the authorization and transfer of ITMOs to internalize the opportunity cost of exporting mitigation outcomes and safeguard NDC integrity
Levies for adaptation and benefit-sharing	Policy-driven contributions that channel a portion of carbon market value to adaptation finance, local development or institutional strengthening

This section examines two levels through which host Parties are shaping the revenue and distributive architecture of their carbon market frameworks. It begins with Section 3.1, which clarifies how fees and levies can apply to non-adjusted mitigation outcomes that are not authorized for international transfer, including voluntary units and MCUs under the PACM. The section then turns to the core design choices associated with authorization and transfers under Article 6.2, covering administrative fees, corresponding adjustment fees, adaptation

levies and benefit-sharing arrangements. Annex I summarizes fees and levies established by various host Parties.

Figure 3 illustrates the main points at which host Parties can introduce fees and levies within their carbon market frameworks, distinguishing between units subject to corresponding adjustments and units issued without corresponding adjustments. Most charges, covering proposal screening, registration, issuance, and benefit-sharing, can apply to both adjusted and non-adjusted units, reflecting the expanding role of domestic oversight across the full range of mitigation activities. The key distinction lies in the corresponding adjustment fee, which applies exclusively to authorized units and internalizes the opportunity cost of exporting mitigation outcomes, and the authorization fee, which finances the issuance of the Letter of Authorization (LoA) and related tracking obligations under Article 6.2.

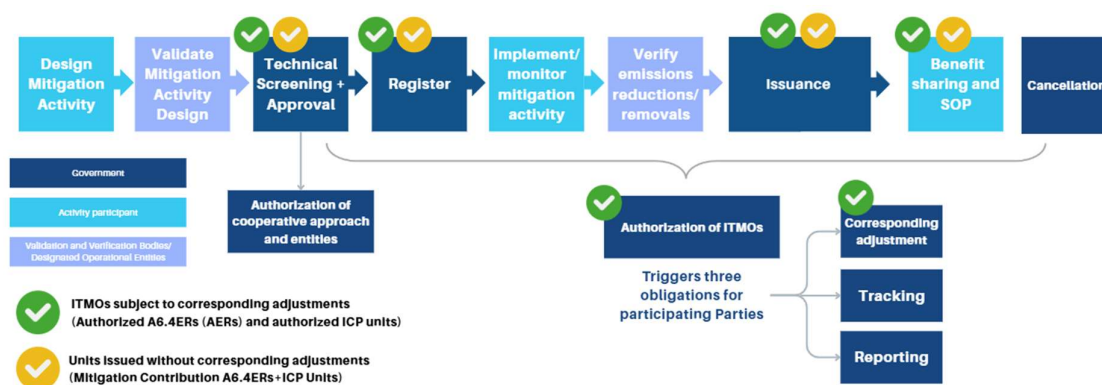


Figure 3: Illustrative Article 6.2 activity cycle and possible fee charging points

2.1. Fees and levies for adjusted units

This section examines the three main fiscal instruments that host Parties apply when authorizing mitigation outcomes for use towards another Party's NDC and/or for OIMP: (i) administrative fees, which ensure the financial sustainability of the institutional infrastructure required to authorize, track and report ITMOs; (ii) corresponding adjustment fees, which internalize the domestic value of exported units and help safeguard NDC integrity against overselling risks; and (iii) adaptation levies and benefit-sharing arrangements, which translate market participation into dedicated resilience finance and tangible gains for affected communities, respectively, embedding distributive considerations within authorization and transfer processes.

2.1.1 Administrative fees

Administrative fees help sustain the continued operation of domestic carbon markets. While the PACM and ICPs apply charges for registration, validation, issuance and related services, host Parties may introduce complementary domestic administrative charges to recover the institutional costs of operationalizing carbon markets. Such revenues support the operation of designated national authorities (DNAs), carbon market offices, and registry systems, ensuring that national oversight functions remain financially self-sufficient rather than dependent on external funding. Conceptually, administrative fees serve both cost-recovery and governance purposes: they finance the institutional architecture and reinforce national ownership over the governance of mitigation outcomes. Their design should be proportionate to the administrative workload and consistent with national fiscal and legal frameworks, so that cost recovery does not undermine market participation or investment attractiveness.

For analytical clarity, administrative fees can be grouped into three main categories based on observed trends: (i) proposal screening and technical review charges; (ii) host-Party authorization and registration charges; and (iii) issuance and/or transfer fees. Each category reflects a distinct stage in the activity cycle and responds to different policy objectives.

Proposal screening and technical review charges are typically applied during the design phase of the mitigation activity and aim to recover the costs associated with screening mitigation activity proposals and reviewing technical documentation. These charges finance the expert and administrative capacity required to assess baselines, additionality, sustainable development contributions, and alignment with national priorities. Kenya and Zambia charge fixed or project-size-dependent fees for reviewing project applications and design documents (Kenya, 2024; Ministry of Green Economy and Environment of Zambia, 2025). Meanwhile, Cambodia and Lao People's Democratic Republic (Lao PDR) apply fixed early-stage technical review charges to maintain accessibility for proponents (Cambodia, 2024; UNFCCC CiACA, 2025a).

Host Party authorization fees are linked to the formal statement by which a host Party determines whether mitigation outcomes issued or to be issued for a mitigation activity are authorized for use toward NDC achievement and/or OIMP. Their rationale extends beyond cost recovery to encompass regulatory oversight, NDC alignment, and the sovereign determination of whether mitigation outcomes may be used toward NDC achievement or OIMP. These fees finance the process of issuing LoAs. Belize's proposed bill requires project proponents intending to sell or transfer credits to apply for a carbon credit authorization permit and pay a



prescribed application and processing fee, while a paper to inform Senegal's levy structure includes an ITMO authorization fee designed to cover the administrative costs associated with ITMO transactions and international reporting (Kovács, Della Maggiore & Pardo, 2024; Belize, 2025).

Authorization fees are distinct from corresponding adjustment fees, which are policy instruments that internalize the opportunity cost of exporting mitigation outcomes by charging for the domestic mitigation value forgone when units are transferred abroad rather than applied toward the host Party's NDC. In practice, the boundary between these two fee types is not always clear. Kenya's regulations link the payment of corresponding adjustment fees to the authorization stage, effectively making the act of authorization and the application of corresponding adjustments functionally intertwined (Kenya, 2024). Paraguay illustrates this approach, establishing a canon of 300 minimum daily wages per project for LoAs alongside a separate canon of 0.08 minimum daily wages applicable to the first transfer of each ITMO unit (Paraguay, 2025). Others go further, consolidating authorization with registration, issuance or transfer charges into a single bundled fee. Malawi's regulatory framework establishes a combined "mitigation activity authorization and registration issuance and transfer fee" of USD 4,000 (Ministry of Natural Resources and Climate Change of Malawi, 2025).

Registry access charges are linked to the enrolment and tracking of mitigation activities within carbon registries, reflecting the infrastructure and operational costs of maintaining systems that record, track and account for ITMOs. These charges support the host Party's obligation to identify and operate a registry consistent with Article 6 accounting frameworks, underpinning tracking, reporting and corresponding adjustment obligations. Some jurisdictions apply charges at the point of entry into the registry system, covering account creation and onboarding, as in Ghana, Malawi, and Zimbabwe (Ghana, 2022; Ministry of Natural Resources and Climate Change of Malawi, 2025; Zimbabwe, 2025). Others impose ongoing annual maintenance fees reflecting the recurring costs of system operation, as in Zimbabwe (Zimbabwe, 2025). Project inscription and listing fees are applied when activities are formally recorded within the registry, an approach adopted by Ghana, Malawi, Paraguay, Tanzania, and Zimbabwe (Ghana, 2022; Ministry of Natural Resources and Climate Change of Malawi, 2025; Paraguay, 2025; Tanzania Environmental Management, 2023; Zimbabwe, 2025). Finally, some jurisdictions require entity identification and auditor fees for service providers, brokers and verification bodies seeking registry access, as in Ghana, Malawi, and Zimbabwe (Ghana, 2022; Ministry of Natural Resources and Climate Change of Malawi, 2025; Zimbabwe, 2025).



Issuance and/or transfer-related charges are tied to outputs, such as credit issuance or transfer volumes. They align administrative revenue with actual market performance, creating a funding stream that scales with activity levels. Paraguay, Zambia and Zimbabwe have adopted transfer-based charges, with Zimbabwe also applying issuance fees (Ministry of Green Economy and Environment of Zambia, 2025; Zimbabwe).

Across these categories, Parties introduce fee design features to enhance fairness, predictability and institutional sustainability. Some link fees to project stages or credit volumes to ensure proportionate cost recovery throughout the activity lifecycle, as seen in Kenya and Tanzania (Kenya, 2024; Tanzania Environmental Management, 2023). Others apply tiered or differentiated structures based on project size, proponent type or domestic status, promoting inclusivity while maintaining revenue adequacy, as in Malawi, Kenya, and Zimbabwe (Ministry of Natural Resources and Climate Change of Malawi, 2025; Kenya, 2024; Zimbabwe, 2025). Periodic indexation mechanisms in Malawi and Zambia preserve fiscal realism under inflationary pressures without introducing regulatory uncertainty (Ministry of Green Economy and Environment of Zambia, 2025; Ministry of Natural Resources and Climate Change of Malawi, 2025).

Ultimately, domestic administrative charges associated with Article 6 participation operate as structured governance instruments that link institutional cost recovery with regulatory oversight. Their differentiation by activity stage and scope allows host Parties to align administrative workload with revenue generation while safeguarding NDC accounting integrity. As national frameworks evolve, fee systems increasingly reflect broader strategic choices regarding the regulation of ITMOs, the treatment of voluntary market activities, and the institutional positioning of Article 6 within domestic carbon market governance.

2.1.2 Corresponding adjustment fees

Unlike authorization fees, which cover administrative processing and oversight costs, corresponding adjustment fees are policy instruments that account for the opportunity cost of exporting mitigation outcomes. This opportunity cost is the domestic climate value that is lost when a unit is transferred abroad instead of being counted toward the host country's NDC.

Host Parties operating under Article 6 face the risk of authorizing or transferring more mitigation outcomes than can be domestically compensated, commonly referred to as the risk of overselling. This risk may undermine national contributions and long-term mitigation goals by constraining future mitigation options or increasing the cost of achieving NDC targets. To



address this risk, host Parties are introducing corresponding adjustment fees to balance international carbon market participation with the protection of domestic climate objectives (UNFCCC CiACA, 2025b; World Bank, 2025). These fees internalize the domestic value of exported mitigation outcomes by charging for the additional cost of achieving equivalent mitigation domestically, thereby monetizing the opportunity cost of units that could have contributed to national targets. In doing so, host Parties turn authorization from a procedural step into a strategic climate governance instrument, while also generating revenue for domestic reinvestment. Accurately setting fees requires marginal abatement cost data, which many host Parties may lack. In the absence of this data, fee levels risk being arbitrary or serving as unintended market benchmarks. Fees are applied at issuance or transfer, integrating overselling safeguards into fiscal design while requiring legal authority and robust data (UNFCCC CiACA, 2025b, pp. 26-27; World Bank, 2025, pp. 132-133).

Corresponding adjustment fees vary in design. Some host Parties apply a specific amount per mitigation outcome and define allocation rules with different levels of detail. Ghana applies a corresponding adjustment fee of USD 3–5 per ITMO, charged at issuance. Revenues cover administrative costs and support a Mitigation Ambition Fund that finances additional mitigation activities beyond the current NDC, particularly for emissions not yet addressed or conditional targets (Ghana, 2022). Kenya charges USD 4 per ITMO, with 50 per cent of the proceeds allocated to the national Climate Change Fund to support resilience, sustainable development, and community-based climate initiatives (Kenya, 2024, p. 12; 20). Malawi charges USD 4 per mitigation outcome to cover accounting and reporting obligations under Article 6.2 (Ministry of Natural Resources and Climate Change of Malawi, 2025, pp. 66, 72–73).

Other host Parties outline the intention to charge a corresponding adjustment fee without specifying an amount. Cambodia’s forthcoming framework requires fees for each authorized emission reduction unit to support national climate ambition (Cambodia, 2024). Suriname introduces an adjustment fee for each authorized mitigation outcome under Article 6.2. This fee must be paid before issuance of the LoA and is earmarked for mitigation and adaptation activities aligned with the host Party’s NDC. This measure aims to recover governance costs and reinvest revenues to strengthen climate ambition, while functioning as a safeguard against overselling (Suriname, 2024). Zambia applies a levy on Article 6.2 and ICP projects requesting a corresponding adjustment, collected at ITMO issuance and scaled by annual mitigation



outcomes to ease the burden on small projects. The revenues are directed towards adaptation and mitigation initiatives (Ministry of Green Economy and Environment of Zambia, 2025).

These instruments are often complemented by buffer and outcome-sharing arrangements, a non-monetary mechanism that addresses integrity and ambition objectives, and whose design is closely intertwined with fee and levy structures. Rather than collecting payments, buffers retain a portion of mitigation outcomes as a safeguard against integrity risks, with country practice ranging from fixed-rate national buffer accounts in Ghana, Malawi, and Zimbabwe (Ghana, 2022; Ministry of Natural Resources and Climate Change of Malawi, 2025; Zimbabwe, 2025), to tiered NDC-linked retention systems in Indonesia and Thailand (Indonesia, 2022; ; Paraguay, 2023; Ministry of Natural Resources and Environment of Thailand 2024; UNFCCC CiACA, 2025b).

Collectively, these fiscal and non-fiscal instruments establish an integrated governance framework that balances participation and environmental ambition, ensures predictable and equitable market functioning, and strengthens confidence in Article 6 implementation. They also reflect a growing recognition that domestic oversight and revenue frameworks extend beyond the instance of international transfer and apply across the full lifecycle of mitigation activities within a national jurisdiction.

2.1.3. Adaptation levies and benefit-sharing arrangements

Under decision 2/CMA.3, participating Parties in cooperative approaches are strongly encouraged to contribute resources for adaptation, including through the Adaptation Fund, and to report on such contributions as part of their regular transparency obligations (annex to decision 2/CMA.3, paras. 37–38). They are also required to promote OMGE, which several domestic frameworks are beginning to operationalize alongside adaptation-oriented levies and benefit-sharing measures (annex to decision 2/CMA.3, paras. 39–40). In response, national frameworks are beginning to translate this guidance into domestic policy instruments that shape how carbon market participation generates public value. These instruments generally operate along three complementary dimensions: supporting adaptation efforts; ensuring net global mitigation outcomes; and distributing benefits among affected stakeholders. The sections that follow examine how these approaches are reflected in national frameworks through adaptation levies, OMGE provisions, and benefit-sharing mechanisms.

Adaptation efforts. Several host Parties embed adaptation financing into their Article 6 frameworks. Malawi has established a differentiated SOP system applying to Article 6.2 and



ICP transactions requesting a corresponding adjustment, calculated as a percentage of gross revenue and differentiated by technology type and land classification: nature-based projects on public protected land are charged 25 per cent and those on customary non-protected land 15 per cent, with cookstoves similarly differentiated by efficiency, and revenues directed to NDC mitigation, climate adaptation, and resilience initiatives (Ministry of Natural Resources and Climate Change of Malawi, 2025). In Panama, Executive Decree No. 135 requires all mitigation activities under the Paris Agreement to contribute financially to the National Climate Change Adaptation Fund (Panama, 2021), while Rwanda's carbon market framework mandates that cooperative approaches under Article 6.2 support its domestic adaptation fund (Rwanda, 2023).

The effectiveness of these approaches hinges on their integration within existing national financial structures, such as environmental funds or climate investment facilities, as well as on ensuring transparency in allocation and traceability of results. Authorization volumes and access to Article 6 resources may be too limited or cyclical to generate large-scale or predictable funding for structural adaptation programmes. While these revenues should not be expected to finance full adaptation projects, they can play a catalytic role by serving as the grant component of blended finance operations or by helping to crowd in additional concessional resources, but overly complex or high-rate designs risk undermining competitiveness, particularly in early market contexts.

OMGE provisions. Participating Parties are also required to promote OMGE, which ensures that a portion of carbon credits is cancelled to deliver a net atmospheric benefit rather than simply offsetting emissions elsewhere. Under the PACM, this requirement is mandatory, set at a minimum of 2 per cent of issued credits. Under Article 6.2, OMGE is strongly encouraged but not mandated at the international level, leaving Parties with discretion over whether and how to operationalize it domestically. The effectiveness of OMGE provisions depends on registry infrastructure to track cancellations, clear authorization procedures, and coordination with acquiring Parties to ensure that domestically negotiated rates translate into verifiable atmospheric outcomes.

National frameworks increasingly reflect this distinction. Several Parties have incorporated explicit OMGE provisions into their domestic regulations, often mirroring the international 2 per cent benchmark. Ghana takes a partially distinct approach, reserving 1 per cent of each mitigation outcome issued on its registry in a national buffer account, which can serve either to manage the risk of overselling against the national target or to contribute to OMGE (Ghana,



2024). Kenya requires the government to apply best practices on cancellation rates and includes a dedicated field in its formal LoA for proponents to commit a percentage of credits toward global emission reductions (Kenya, 2024). Zambia's 2025 framework mandates a default 2 per cent withholding of mitigation outcomes, held in a dedicated registry account and transferred to the UNFCCC International Registry for cancellation, with higher rates available by agreement between Zambia and its partners (Zambia, 2025). Zimbabwe lists OMGE delivery as a primary objective of its 2025 Carbon Trading Regulations (Zimbabwe, 2025).

Benefit-sharing mechanisms. These mechanisms address a related but distinct objective: translating carbon market revenues into tangible gains for communities most directly affected by mitigation activities. Their design is shaped by domestic frameworks for carbon credit ownership. In these frameworks, the state holds ownership and levies function as sovereign charges that capture public value. In mixed-ownership systems, however, the government's role shifts toward regulation, and revenues are distributed across communities and private participants (The Nature Conservancy, 2024).

National regulations reflect three broad approaches: (i) distributions to subnational authorities, as in Malawi, Indonesia, and Tanzania,, where shares of project revenues flow to local councils, regional governments and district structures (Ministry of Natural Resources and Climate Change of Malawi, 2025; Indonesia, 2022; Tanzania Environmental Management, 2023); (ii) community development agreements, as in Kenya, Nigeria, and Zambia, where binding arrangements require project developers to remit defined shares of earnings to affected communities consistent with the principles of free, prior and informed consent (Kenya, 2024; Ministry of Green Economy and Environment of Zambia, 2025; Nigeria, 2025); and (iii) distributions to national funds, as in Suriname, whose phased model allocates proceeds across the national budget, a sovereign wealth fund, rural communities and project developers (Suriname, 2024).

These cases reveal a growing interest in using domestic levies to align carbon market participation with both resilience-building and equitable distribution of benefits. Their effectiveness depends on transparency in fund management, legal clarity, and integration with national finance instruments. While revenues from these mechanisms will seldom be large enough to fund full-scale adaptation programmes or comprehensive community development, they can play a catalytic role by serving as the domestic grant component that helps crowd in concessional and private finance for climate resilience and local ownership.

2.2 Fees and levies for non-adjusted units

This section clarifies how host Parties treat mitigation outcomes that are not authorized for use towards another Party's NDC and/or OIMP. This category includes non-adjusted units resulting from voluntary activities and MCUs issued under the PACM that are kept as mitigation contributions rather than transferred internationally. These units fall outside the corresponding adjustment framework and remain within the host Party's NDC accounting, yet they may still be subject to domestic regulatory oversight. Although these activities do not trigger the authorization and transfer procedures defined under Article 6.2 or the PACM activity cycle, they still follow a project lifecycle that involves entry, operational oversight, and credit monetization stages at the domestic level.

Unlike authorization-linked fees, which internalize the opportunity cost of exporting mitigation outcomes or safeguard NDC integrity through corresponding adjustments, fees applied to non-adjusted units are grounded in domestic regulatory oversight. Even when authorization is not requested, host governments may still incur costs related to no-objection or notification procedures, optional domestic registration of activities, oversight of monitoring and reporting arrangements, transparency and data management requirements, and, in some cases, the administration of benefit-sharing frameworks. These costs stem from the exercise of domestic regulatory oversight over mitigation activities taking place within a national jurisdiction and are independent of whether mitigation outcomes are authorized for international transfer (UNFCCC CiACA, 2025b). Accordingly, such charges are best understood as cost-recovery instruments linked to regulatory functions, rather than as measures associated with international transfer or accounting obligations.

While ICPs historically operated with limited government involvement and oversight, recent developments highlight two converging trends. First, voluntary buyers are increasingly seeking alignment with Article 6 concepts, including clarity on authorization status and host Party oversight. Second, host governments are asserting a stronger regulatory role over mitigation activities occurring within their jurisdiction, particularly where projects interact with land use, natural resources, or community rights (UNFCCC CiACA, 2025b). As a result, several Parties have introduced or are considering administrative fees or levies that apply irrespective of authorization, provided that activities fall within a regulated domestic carbon market framework.



Country-level practice reveals four categories of charging points applied to non-adjusted units, grouped as follows: (i) proposal screening and technical review charges, which cover fees for the submission and assessment of project documentation, such as project design documents and supporting materials; (ii) registry access and project registration charges, covering fees for account creation, project registration, and access to national registry infrastructure; (iii) operational and transaction-linked charges, including annual administrative fees and per-unit levies tied to the issuance, listing, or transfer of credits; and (iv) benefit-sharing contributions, which redistribute a share of gross revenues or transaction value to governments, local communities or public funds. Each category reflects a distinct point in the domestic oversight framework governing mitigation activities, ranging from project entry and administrative processing to ongoing registry operations and revenue realization. Benefit-sharing contributions often represent the most financially significant obligation.

Across these categories, emerging country practice reveals nuanced approaches. Some jurisdictions apply these charges broadly across all carbon market activities, encompassing both voluntary and compliance-oriented transactions, while others explicitly target voluntary carbon market (VCM) activities. In most cases, however, limited differentiation is made between mitigation outcomes generated under different mechanisms, including Mitigation Contribution A6.4ERs. Regarding proposal screening and technical review, Zimbabwe imposes fixed project design document submission fees, regardless of authorization status (Zimbabwe, 2025). On registry access and project registration, Ghana charges a tiered entity application fee at account creation and a per-unit listing fee of USD 0.01 per credit for recording credits on the national registry (Ghana, 2022). On operational and transaction-linked charges, Tanzania requires annual administrative and project charges calculated as a percentage of income from sold credits, applying these explicitly to voluntary carbon credit trading (Tanzania Environmental Management, 2023). On benefit-sharing, Kenya requires land-based projects to remit at least 40 per cent of aggregate earnings to the community and non-land-based projects at least 25 per cent, while Malawi mandates a share of proceeds equivalent to 25 per cent of gross revenue for all VCM projects subject to domestic oversight, including those requesting only a Letter of No Objection (Kenya, 2024; Ministry of Natural Resources and Climate Change of Malawi, 2025).

These cases reflect a trend toward institutionalizing domestic oversight of non-adjusted units, with emerging obligations constituting an additional cost that project developers must consider when assessing project viability and expected returns.



2.3 Fees and levies applied by independent crediting programmes

While previous sections focus on domestic charges for adjusted and non-adjusted units, project developers also face programme-level fees applied by the PACM² and ICPs. These typically cover project registration, validation, verification, issuance, and post-registration changes, and in some cases include levies to support programme-specific objectives such as adaptation or quality assurance.

As these fees form part of the overall cost burden on mitigation activities, host Parties often take them into account when calibrating national fees and levies, so as to avoid excessive cumulative costs for project developers or unintended disincentives to participate. A comparative overview of programme-level charges is provided in Annex II.

² For the PACM, both administrative fees and SOP contributions are waived for activities hosted in least developed countries and Small Island Developing States, in recognition of their special circumstances, unless they choose to participate. This exemption removes financial barriers and creates space for these Parties to define their own domestic levies if they wish, aligning carbon market participation with national priorities (decision 7/CMA.4, 2022; Annex I, Chapter V, Section A).



Conclusion

Emerging country experience with Article 6 demonstrates that fees and levies are more than technical components of carbon market regulation. They operate as governance levers that influence authorization decisions, transfer volumes, market participation, and the distribution of risks and benefits across actors. Across host Parties, implementation is evolving from ad hoc project procedures into structured national systems that regulate, price and manage mitigation outcomes. As regulatory frameworks mature, more host Parties are introducing fees and levies to recover governance costs, mobilize public revenue, and ensure that carbon market participation contributes to national mitigation and development priorities.

Across emerging regulatory frameworks, clarity on institutional roles and legal authority has proven central to effective implementation. Public authorities must determine which entity is responsible for collecting, managing and reporting revenues, and embed these functions within domestic Article 6 governance systems. Without this foundation, revenue management risks becoming fragmented, reporting inconsistent, and market confidence undermined. Regulatory choices related to authorization and market access interact directly with fee and levy design, influencing not only market participation but also the feasibility and continuity of mitigation activities and their associated sustainable development benefits.

Balancing revenue generation with market competitiveness remains a central design challenge, particularly given the cumulative transaction cost that arises when domestic charges are layered on top of ICP fees. Excessive or unpredictable charges may deter investment, while low pricing may undermine fiscal sustainability. In practice, credit revenues often constitute a central component of project viability, underpinning upfront investment decisions and ongoing operational costs. Where market access is constrained or delayed through authorization decisions or regulatory uncertainty, projects may face material financing gaps even when mitigation outcomes have already been achieved. Transparent and proportionate fee structures are therefore essential for sustaining governance while preserving the conditions under which mitigation activities can be delivered and scaled.

Safeguards against overselling and equity in benefit distribution are equally central to the legitimacy and environmental integrity of cooperative approaches. Parties are increasingly applying fees and levies and other measures to manage the pricing and volume of ITMOs, illustrating how fiscal instruments can reinforce environmental integrity when paired with sound MRV and national accounting systems. At the same time, revenue allocation



mechanisms, whether through earmarking, community payments, or dedicated climate funds, help ensure that carbon market engagement delivers tangible benefits to affected communities and vulnerable groups. Clear and legally grounded rules on the legal status of carbon credit, ownership, carbon rights and revenue distribution are essential to securing local support and reinforcing the social legitimacy of cooperative approaches.

Looking ahead, the continued evolution of Article 6 underscores the need for increased capacity, improved data systems, and advanced analytical tools. This evolution increasingly reflects a move toward system-level carbon market governance, where fees and levies play a central role in aligning market participation with national climate strategies. Parties need better information on marginal abatement costs, projected mitigation potential, and domestic oversight capabilities to effectively calibrate fees and levies. Continued investment in institutional capacity and technical expertise will be essential as Article 6 markets grow and more Parties move toward full implementation and regulatory maturity. The integration of adaptation finance, OMGE, and benefit-sharing considerations into these systems will be critical for ensuring that carbon market participation delivers environmental integrity, supports national priorities, and maintains political and social legitimacy. Transparent, equitable and well-calibrated fee and levy frameworks will remain important for ensuring that carbon market participation supports national ambition, contributes to global mitigation, and aligns with the principles of fairness, integrity and sustainable development embedded in the Paris Agreement.

For units that are authorized for use toward another Party's NDC or for OIMP, fees and levies serve as core policy instruments influencing a host Party's authorization decisions and international engagement. Administrative charges associated with such units support the institutional and reporting systems required for authorization, tracking and transparency under Article 6.2. At the same time, corresponding adjustment fees can internalize the opportunity cost of authorizing mitigation outcomes for use outside the host Party's NDC rather than retaining them for domestic achievement.

In this context, charges applied to these units may also function as safeguards against overselling, ensuring that authorizations are aligned with national mitigation priorities and the domestic value of exported mitigation outcomes. Adaptation levies, OMGE provisions, and benefit-sharing mechanisms can further embed national development, environmental integrity, and resilience priorities within cooperative approaches, reinforcing national ownership of authorization processes while mobilizing resources for mitigation and adaptation and ensuring net global emission reductions.



For **non-adjusted units**, fees and levies play a different but equally important role. As these mitigation outcomes remain within the host Party's NDC accounting and do not require corresponding adjustments, associated charges primarily reflect domestic regulatory oversight rather than international accounting requirements. Host Parties are increasingly regulating voluntary market activities and MCUs through domestic project registration fees, registry access charges, monitoring and reporting fees, and benefit-sharing requirements.

These instruments help recover the costs of national oversight systems, strengthen transparency, and ensure that mitigation activities contribute to national priorities even when no international use occurs. As voluntary market activity expands and more jurisdictions formalize domestic carbon market frameworks, charges on non-adjusted units are expected to play an increasingly important role in aligning private mitigation activities with national climate and development priorities.

Annex I

Administrative charges for adjusted units

Party	Rate / Amount	Unit of application	Collection point	Revenue use
Proposal screening and technical review charges				
Kenya	KES 10,000/USD 77 (citizen) / KES 100,000 / USD 771 (non-citizen) ³	Per project concept note	Project submission	Administrative costs
	KES 100,000 /USD 771 (citizen) / KES 200,000 / USD 1,543 (non-citizen)	Per project design document	Document submission	Administrative costs
Malawi	USD 2,000	Per mitigation activity idea note (MAIN)	MAIN submission	Carbon market office costs
	USD 4,000	Per mitigation activity design document (MADD)	MADD submission	
Zambia	Fixed amount (to be determined via statutory instrument)	Per mitigation activity identification note	Initial design phase	A6 secretariat and committee costs
	Fixed amount (to be determined via statutory instrument)	Per mitigation activity design document	Validation phase	
Zimbabwe	USD 3,000	Per project idea note (PIN)	PIN submission	Administrative costs
	USD 5,000	Per project design document (PDD)	PDD submission	
Host-Party authorization and registration charges				
Belize	Prescribed fee (to be determined by regulations)	Per authorization permit	Request for permit	Consolidated Revenue Fund

³ 1 Kenyan Shilling = 0.0077 United States Dollars (as of March 2026).

Malawi	USD 4,000	Per mitigation activity	Authorization and registration	Administrative costs and international reporting
Paraguay	300 minimum daily wages	Per project	Issuance of LoA	Carbon market directorate
Registry access and maintenance charges				
Ghana	USD 300 / 500 / 1,000 (tiered by project scale)	Per entity account	Onboarding submission	Registry operations and administrative costs
	USD 0.20	Per ITMO unit	Registration or issuance	
	USD 400	Per entity	Identification request	Administrative expenses
Paraguay	150 minimum daily wages	Per project	Registry inscription	Registry operations
Tanzania	1% of expected credits	Per project	Final approval/registration	Carbon trading development
Zimbabwe	USD 500 (local general account) / 1,000 (foreign general account); USD 2,500 (local developers) / 5,000 (foreign developers)	Per account	Registry account creation	Registry operations
	USD 250–2,500 (tiered by entity type/nationality)	Per account per year	Annual operation	Registry operations
	USD 2,000	Per auditor	Account creation	Administrative costs
Issuance and/or transfer-related charges				
Kenya	Kenya Shilling equivalent (KES) of USD 0.10 (first 15k units) / USD 0.20 (in excess of 15k)	Per credit unit per year	Within 30 days of sale	Administrative costs
Malawi	USD 0.20	Per mitigation outcome	Request for issuance	Administration, reporting and review
Paraguay	0.08 minimum daily wages	Per ITMO unit	First international transfer	Carbon market directorate
Zambia	Tiered: First 50k units / 50k–100k / >100k	Per ITMO unit	Issuance request	Adaptation and A6 operation
Zimbabwe	USD 0.20	Per carbon credit	Issuance	Administrative costs
		Per authorized mitigation outcome	Issuance/registration	
	2% of transaction value	Per transaction	External transfer	Treasury/earmarked funds

Corresponding adjustment charges for adjusted units

Party	Rate / Amount	Unit of application	Collection point	Revenue use
Cambodia Ghana	USD 3 (grant-based) / USD 5 (small & large scale)	Per ITMO unit	At issuance	90% Mitigation Ambition Fund; 10% administrative costs
Cambodia	To be determined (TBD)	Per authorized unit	Prior to letter of positive examination	Mitigation and adaptation ambition
Kenya	KES equivalent to USD 4	Per ITMO unit	At issuance	50% National Climate Change Fund; 50% DNA
Malawi	USD 4	Per issued mitigation outcome	Soon after issuance (post-pre-approval)	Accounting, transfer reporting, and international reporting
Suriname	TBD / Specify per mitigation outcome	Per authorized mitigation outcome	Before issuance of LoA	Mitigation and adaptation aligned with NDC
Zambia	Stratified rates in Zambian Kwacha (ZMW) amount TBD	Per ITMO unit (tiered by volume)	At ITMO issuance	Adaptation and mitigation initiatives

Adaptation and benefit-sharing charges for adjusted units

Party	Rate / Amount	Unit of application	Collection point	Revenue use
Belize	Not defined in the draft regulation	Proceeds from carbon trading and the sale of carbon credits generated by projects or programmes	Triggered when the government participates in a transaction involving the sale of carbon credits related to emission reduction or removal activities	Deposited into the Consolidated Revenue Fund; the government may provide compensation to landholders whose forest carbon was included in the transaction
Côte d'Ivoire	50% (communities) 25% (institutional) 25% (indirect)	Emission reductions payment, defined as the net monetary revenues from the sale of verified emission reductions	Credit sale	Local communities (including women/youth), Forest management (OIPR/SODEFOR) ⁴ , and governance

⁴ OIPR – Ivorian Office of Parks and Reserves / SODEFOR – Forestry Development Corporation

Kenya	At least 40% (land-based); at least 25% (non-land)	Aggregate earnings of the previous year	Annual operation	Community development via community development agreements
Malawi	SOP ranges from 15% to 40% depending on project type	Gross revenue	Issuance of ITMOs	Climate adaptation, resilience, NDC mitigation, and district councils
Paraguay	3% to 10%	Generated ITMOs	Transfer	Safeguarding NDC targets; Buffer for national compliance
Suriname	Phased revenue-sharing model	Phased allocations	Implementation stages	National budget, Sovereign Wealth Fund, rural communities, and developers
Tanzania	N/A	Gross revenue accrued from the sale of certified emission reductions (CERs) from land-based projects	Credit sale	61% to the managing authority (property owner), 30% retained by the project proponent, and 9% transferred to the DNA for national funds and carbon market administration
Zambia	2% (OMGE); SOP is collected via stratified monetary rates based on the annual volume of units	Mitigation outcomes / ITMO units	Issuance	Adaptation initiatives and OMGE cancellation

Charges for non-adjusted units

Party	Rate / Amount	Unit of application	Collection point	Revenue use
Proposal screening and technical review charges				
Benin	Fixed by decree	Per project	Submission of application	Costs of studying the request
Kenya	KES 10,000/USD 77 (citizen) / KES 100,000 / USD 771 (non-citizen)	Per project	Project application	Administrative costs
	KES 100,000 /USD 771 (citizen) / KES 200,000 / USD 1543 (non-citizen)	Per PDD	PDD submission	
Zambia	TBD	Per MAIN/MADD	Upfront at submission	Administrative costs of A6 secretariat/ Technical Sub-Committee on Climate Change
Zimbabwe	USD 3,000	Per PIN	PIN submission	Administrative costs
	USD 5,000	Per PDD	PDD submission	

Registry access and project registration charges				
Ghana	USD 300 / 500 / 1,000 (tiered by scale)	Per entity	Account creation on registry	Administrative and management expenses
	USD 200 / 300 / 500 (tiered by scale)	Per additional project	Mitigation activity identification request	Registry and administrative costs
Malawi	USD 1,000	Per entity	Mitigation activity participant application for registry onboarding	Registry registration and account maintenance
Paraguay	150 minimum daily wages	Per project	Project inscription in registry	Registry operations
Tanzania	1% of expected credits	Per project	Project registration	Management and development of carbon projects
Zimbabwe	USD 500–5,000 (tiered by entity/nationality)	Per account	Registry account creation	Registry operations
Operational and transaction-linked charges				
Ghana	USD 0.01	Per credit unit	Listing on national registry	Maintenance and running of registry system
Tanzania	3% of income from sold credits	Per credit unit	Annual administrative charge	DNA management and market control
	5% of income from sold credits	Per credit unit	Annual project charge	Carbon trading development
Zimbabwe	USD 250–2,500 (tiered by entity)	Per account	Annual registry maintenance	Registry operations
	USD 0.10	Per credit unit	Credit recognition (VCM).	Administrative costs
Benefit-sharing contributions				
Kenya	At least 40% (land) / 25% (non-land)	Aggregate earnings from the previous year refer to the total income from a carbon project, without any adjustments for inflation, taxation or types of double counting	Annual social contribution	Managed/disbursed for community benefit via community development agreements
Malawi	A 25% rate applies specifically to VCM projects not requiring a corresponding adjustment	Gross revenue from CERs	Sale of VCM credits at the point of issuance	NDC unconditional targets, adaptation, and resilience
Tanzania	The managing authority is entitled to 61% of gross revenue (land-based)	Gross revenue	Sale of credits	51% to village government for community development and conservation

				activities; 10% to local council for conservation and carbon-trading activities (applicable when the managing authority is under the council)
Zimbabwe	30% of transaction value of VCM activities	Gross revenue	Applied at the time of issuance on, or transfer to, the Zimbabwe Carbon Registry	Government's 30% SOP is held in the National Transaction Account, a dedicated account on the Zimbabwe Carbon Registry used to manage and sell credits held by the state

Annex II

Illustrative comparison of programme-level charges across major independent crediting programmes

Fees	Gold Standard	Verra / Verified CarbonStandard (VCM)	PACM
Account fees			
Account opening fee	N/A	USD 750	USD 500 for the first account opened by an account holder; USD 800 for the second and each subsequent account opened by an account holder
Annual account maintenance fee	USD 1,000	USD 750	USD 400 for each account
Account reactivation fee	USD 1,500	USD 2,000	N/A
Project registration & review fees			
Project listing fee	USD 1,000 (40% discount for microscale + regular voluntary project activity (VPA))	USD 1,500	N/A
Registration fee	USD 2,500 (40% discount for micro-scale + regular VPA)	USD 3,750	< 15,000 t CO ₂ e ⁵ per annum = USD 1,500 15,000 to 50,000 t CO ₂ e per annum = USD 5,000 > 50,000 t CO ₂ e per annum = USD 10,000
Performance review fee	USD 2,000 (40% discount for microscale + regular VPA)	N/A	N/A
Verification review fee	N/A	USD 5,000 comprising the following: • USD 2,500 verification review request fee • USD 2,500 prepayment fee which is credited against future issuances	N/A
Requantification review fee	N/A	USD 10,000 per request	N/A
Issuance fees			

⁵ t CO₂e – tonnes of carbon dioxide equivalent

Credit issuance fee	Two options: • Cash: USD 0.25/credit; or • SOP: USD 0.15/credit plus 2% of issuance For projects in least developed countries: • Cash: USD 0.20/credit; or • SOP: USD 0.10/credit plus 2% of issuance	USD 0.23 per claimed t CO2e of reductions or removals	USD 0.15 per A6.4ERs
Transfer, retirement and cancellation fees			
Transfer, retirement and cancellation fee	USD 0.02 each	USD 0.02 each	N/A
Other fees			
Adaptation fee (% of t CO2e)	N/A	N/A	5%
SOP for OMGE (% of t CO2e)	N/A	N/A	2%
Renewal fee of projects	N/A	N/A	Same as registration fee
Renewal fee of programmes of activities	N/A	N/A	10,000
Renewal fee of component projects under programmes of activities	N/A	N/A	800
Design certification renewal	USD 2,000	N/A	N/A
Design change review	USD 1,000	N/A	N/A
Deviation reconsideration request	USD 1,000	N/A	N/A
Certified Emission Reductions to Verified Emission Reductions conversion fee	USD 0.15	N/A	N/A
Article 6 label	USD 0.0506	USD 0.050	N/A
Post-registration change fee	N/A	N/A	USD 1,500
Other Verra labels ⁷	N/A	\$0.070	N/A
Other Gold Standard labels ⁸	USD 0.10	N/A	N/A

⁶ Including Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)

⁷ ABACUS [<https://verra.org/verra-launches-abacus-label-for-ecosystem-restoration-and-reforestation-credits/>] label; Climate, Community & Biodiversity (CCB) label; greenhouse gas emission reduction label and carbon dioxide removal label; and Sustainable Development Verified Impact Standard (SD VISTA).

⁸ Renewable Energy labels (RELs), and certified emission reduction (CER) labels.

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