

ReNew's Input to the Article 6.4 Supervisory Body

Structured Public Consultation on Modalities for Operation of the Article 6.4 Mechanism Registry

September 2023

INTRODUCTION

ReNew acknowledges and appreciates the diligent efforts of the Article 6.4 Supervisory Body (SB) and the Secretariat in advancing the work to operationalize the Article 6.4 mechanism registry. We recognize the significant progress achieved thus far through extensive deliberations. These deliberations will play a pivotal role in shaping a robust and effective registry system for Article 6.4.

We embrace this opportunity to contribute our insights to this process. In response to the issues and options for the Article 6.4 registry that were presented by the Secretariat during the 6th meeting of the SB, we wish to offer the following comments and recommendations for improvement

FUNCTIONAL SCOPE OF MECHANISM REGISTRY

Creating and maintaining separate account for CERs

With the transition of CDM projects into the new Article 6.4 registry, it is expected that there would be a high volume of CER credits might be used for fulfilment of NDCs, at least the ongoing NDC after Article 6.4 registry is in action. Hence, there should be a separate account for CERs on par with the accounts of A6.4 ERs and MCUs instead of identifying CERs through A6.4 ERs through their vintage for ease of operation.

ROLE OF MECHANISM ADMINISTRATOR

Cooperation with International Registry

We endorse the view that Mechanism Registry is to be connected to the International Registry to allow automated pulling and viewing of information on holdings and action authorisation of A6.4 ERs for use by Paris Agreement Parties who are Activity Participants. However, nature and extent of its interoperable features and its connections to (i) the International Registry and (ii) other registries, for adoption has to be discussed by all stakeholders/CMA before COP28.

REGISTRY FUNCTIONS

Methodology Approval Process

Among other things, new methodology approval process guidelines must be established. Efficient and timely approval of new methodologies and related processes is paramount, necessitating the establishment of clear and streamlined guidelines. These guidelines should adhere to predetermined

timelines set forth by the methodology expert panel or a similar governing body as defined in Article 6.4. This urgency is particularly critical when it comes to the development of novel methodologies, including those associated with carbon removals, the selection of verification and validation bodies, the submission of methodology deviations, and the ongoing maintenance of the retirement registry. Establishing a framework that guarantees adherence to these stipulated timelines will enhance the overall effectiveness and responsiveness of the approval process, ensuring that climate action initiatives remain agile and adaptive to evolving needs.

CONNECTION BETWEEN REGISTRIES

Standard ER reporting format across registries

As discussed in previous Secretariat meetings, connection of the Article 6.4 registry with the international registry is indeed important and shall help to simplify operations, ensure proper reporting from all parties, and enable interoperability between the two registries. ReNew supports the idea of connecting these registries and commends the Secretariat to attempt to bring these registries together. But for this model to work, there must be a standard reporting mechanism under Article 6.4 registry, while the parties must have an account in both the Article 6.4 registry and the international registry. The reporting units and formats in both the registries must be common to ensure interoperability. The current reporting of emissions data on the international stage through the Biennial Transparency Report (BTR) is inconsistent, as countries report in the format that they find suitable. The reporting formats must be aligned between the countries in the international registry, and the same formats must be applicable under the Article 6.4 registry.

Connection with Article 6.2 Mechanism

While the Article 6.4 mechanism and registry takes shape, Article 6.2 has been the international transfer mechanism which has been operationalized by a bunch of countries. Currently the transactions under Article 6.2 are separately reported by different buyer and seller countries. Once there is a registry which takes stock of the ERs traded under the bilateral arrangements under Article 6.2, there shall be a need for a connection between this registry and the Article 6.4 registry. The SB and the Secretariat should consider an interlinkage between these registries.

ADDITIONAL REGISTRY SERVICES

ReNew appreciates the efforts of the Secretariat and the SB of delving into registry enhancements that can amplify the effectiveness and resilience of the Article 6.4 mechanism. We stress the need to streamline the architecture of the mechanism registry, a move that would not only reduce expenses but also foster greater participation. In this regard, we would like to registry to focus on formulating processes which ensure methodology and project registration in a defined timeline, and includes all the necessary checks and balances required to ensure a comprehensive cost-benefit assessment of various alternatives and considerations for interoperability features.

About ReNew

ReNew is India's leading decarbonization solutions provider and the holders of the largest Renewable energy portfolio in India. ReNew has sold a total of 15 million credits in Renewable energy sector till

date and have an extensive pipeline of approximately 70 projects covering diverse sectors such as nature-based removals, tech-based removals, and green fuels. These projects span various geographical locations across Asia and Africa, underscoring the company's global reach and ambition to address environmental challenges on a broader scale. ReNew strives to produce high quality carbon credits, with increased focus on monitoring, community engagement and ground impact.

ReNew looks forward to further engaging with the Article 6.4 Supervisory Body. Please feel free to contact Mr. Bishwaranjan Roy (bishwa.roy@renew.com) and Mr. Indradeep Das (indradeep.das@renew.com) for any further questions and deliberations on any of the points mentioned.