



Call for input 2024 - Issues included in the annotated agenda and related annexes of the tenth meeting of the Article 6.4 Supervisory Body

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Here are indicated some inputs from Osservatorio Parigi under the [Call for input 2024 - Issues included in the annotated agenda and related annexes of the tenth meeting of the Article 6.4 Supervisory Body](#)

1. Feedback on the Proposed Agenda

[Roles and Responsibilities of Parties \(A6.4-SB010-AA-A02\)](#)

Pg 11-12 It is concerning that given how central the information pertaining to NDC alignment and reporting is for participation in the mechanism is that there will only be explicitly a non-substantive review or light touch guidance, there needs to be a review mechanism for non-compliance with reporting otherwise the reporting has no useful function outside of public disclosure and review.

Pg 38- The approval is meant to outline “how the expected GHG emission reductions or net GHG removals contribute to the host Party’s NDC” unless this is designed to pertain to MCUs not A6.4ER it could lead to double attribution of NDC progress between purchasing and host country.

[Inputs on the appeal and grievance mechanism \(A6.4-SB010-AA-A04\)](#)

Accessible and Inclusive Appeal and Grievance Mechanism:

As independent observers committed to the principles of justice, transparency, and inclusivity in environmental and climate governance, we present our recommendations for the appeal and grievance mechanism under consideration. Our suggestions are grounded in the fundamental belief that the mechanism must be accessible and user-friendly, not limiting participation in any form, particularly for vulnerable communities and the youth who often may lack formal entities to initiate a grievance process.

1. **Principles of Accessibility and User-Friendliness:** The mechanism should be designed with minimal barriers to entry, ensuring that language, literacy, or technical understanding does not inhibit any stakeholder's ability to engage. This includes making information available in multiple languages and formats that are easily understandable to non-specialists.
2. **Emphasis on Vulnerable Communities:** Special attention must be given to ensure that the mechanism is accessible to those most affected by environmental and climate issues, including indigenous communities, persons with disabilities, and economically disadvantaged groups. Mechanisms for submitting grievances

should accommodate various forms of communication, acknowledging the digital divide that may affect access.

3. **Intergenerational Equity and Youth Participation:** Recognizing the disproportionate impact of environmental and climate issues on future generations, the mechanism must incorporate avenues for meaningful participation by youth. This includes simplifying procedural requirements and considering non-traditional forms of evidence and submission to accommodate younger stakeholders who may not have access to formal representation.
4. **Transparency and Accountability:** Ensuring that the process for appeals and grievances is transparent and that outcomes are communicated clearly to all stakeholders. This includes the publication of guidelines, processes, and the rationale behind decisions in an accessible manner.
5. **Independence and Fairness:** The mechanism should operate independently of entities that may have a vested interest in the outcomes of environmental and climate projects. This ensures that grievances are adjudicated fairly and without bias.
6. **Effective Remediation:** The appeal and grievance mechanism should not only address grievances but also facilitate effective remediation that is timely, fair, and appropriate to the harm suffered. This includes considering the social, environmental, and cultural impacts of projects and activities.
7. **Continuous Improvement and Learning:** The mechanism should incorporate feedback loops to continuously improve its accessibility, efficiency, and effectiveness. This includes engaging with stakeholders to gather feedback on the mechanism's performance and implementing lessons learned in a timely manner.
8. **Establish independent grievance mechanism by CMA 6,** including considerations of human rights such as the human right to health and the human right to a clean, healthy and sustainable environment, as well as the rights of Indigenous Peoples.

Sustainable Development Tool (A6.4-SB010-AA-A05)

- Having an in depth guide for REDD+ activities which are already housed within Article 5, adding this annex into Sustainable Development Tool prejudices their inclusion, especially given there was no consensus to add avoided emissions and conservation enhancement activities alongside tangible reduction and removal activities at COP28 deliberations.
- This finding again prejudices novel removals determining the sweeping conclusion that the **environmental and social risks of removals are different and additional to those posed by emission reduction activities** (p116). This sentiment, and its expression throughout the annex, ignores that novel removals also have environmental and social benefits, and that the former can significantly exceed emissions reductions projects. Indeed, as the Oxford Offsetting Principles recognise achieving Net-Zero emissions is only possible to a transition to 100% durable removal based offsetting claims. Targeting novel removals in this way, adding additional complexity, makes net zero alignment of Article 6.4 even more difficult.
- CCS is also frequently conflated with CDR (pg 107-122) which is actually an emissions reduction mechanism (reinforcing the point that the risks of removals are not necessarily greater). Guidance is referenced to injection for EOR, which has many more risks than deep storage.

Under 5.3.3. Principle 6: Health and safety

Rules for removal activities must take into account the many associated risks, including undermining the human right to health and to a clean, healthy and sustainable environment.

Consider also the health co-benefits, beside safety and risk of mitigation outcomes and A6.4 ER under a One-Health vision and [Health in all Policies approach](#)

References

- <https://www.lancetcountdown.org/data-platform/mitigation-actions-and-health-co-benefits>
- [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(23\)01859-7/abstract](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(23)01859-7/abstract)

Operation of the mechanism registry (A6.4-SB010-AA-A06)

Overall: the structure really reflect classical structure of relational databases, but currently DB technologies can provide even different alternatives like NoSQL database, XML or better blockchain that can be put into consideration to be more flexible real-time and fit more with the dynamic exchanges

On par. 5.2. Whether secondary transfers between accounts in the mechanism registry (“trading”) are allowed

Option 1 is more protectionist for environmental integrity if we are considering accounts only relate to parties .

But eventually to foster the engagement of the private sector , it should be possible that secondary transfer can be allowed to non-party accounts and connects also A6.4ER under VCM.

Further work on the methodological products for the Article 6.4 mechanism (A6.4-SB010-AA-A08)

It is unclear why only emission reduction activity methodologies are being prioritised for transfer, not any removal categories.

Table 3. List of clean development mechanism methodologies that may be prioritized for transitioning to the Article 6.4 mechanism