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**Legend for Columns**

**0** = Main document or Appendix (provide Appendix number)  
**1** = Section Number in the document or Annexes  
**2**= Paragraph, table or figure number  
**3** = Nature of input is general, technical or editorial  
**4** = Comment – the actual feedback or observation, including justification for what needs changing  
**5** = Proposed change – suggest the text if possible  
**6** = Assessment of comment – secretariat to document response/action taken to comment

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M or A#	Section no.	Para., table or figure no.	Type of input G = general T = technical E = editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
<b>M</b>	<b>3</b>	<b>6(d)</b>	<b>G, E</b>	According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.	6(d) “ <b>A6.4 PoA</b> participant” is a public or private entity that participates in an <b>A6.4 PoA</b> .	
<b>M</b>	<b>3</b>	<b>6(e)</b>	<b>G, E</b>	According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs).  Therefore it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4 mechanism projects and PoAs” not be introduced or be replaced with another term (e.g., “A6.4 projects and PoAs”) to avoid an unjustified limitation of the term “activity”. This is even more important since Para 8(e) of the draft document uses the term “Article 6, paragraph 4, activity (A6.4 activity),” creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one document.	6(e) “Methodology” is, unless otherwise specified, a mechanism methodology referred to in the RMPs, as approved by the Supervisory Body, to set a baseline for the calculation of emission reductions to be achieved by Article 6.4 mechanism projects and PoAs (hereinafter collectively referred to as <b>A6.4 projects and PoAs</b> ), to demonstrate the additionality of <b>A6.4 projects and PoAs</b> , to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by <b>A6.4 projects and PoAs</b> .	
<b>M</b>	<b>4</b>	<b>4.4-4.5</b>	<b>G</b>	1) The Parties to the Paris Agreement undertake certain endeavours and implement activities related to the Parties’ commitments under the Paris Agreement in order to reach its goals. The implementation of such activities, whether directly or through authorized		

<b>Call for public input</b>	<b>Draft Procedure: Article 6.4 activity cycle procedure for programme of activities (ver. 02.0)</b>
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				<p>entities, may directly affect the level of endeavours a Party must undertake, the ability of the host Party to reach its NDC, and other significant aspects of the Party's state of affairs. Each and every aspect of a proposed A6.4 activity is of importance to a Party (and not only to the Supervisory Body).</p> <p>A Party should have access to the maximum available information about the proposed A6.4 PoA and the PoA participants before the Parties make any decision to approve the A6.4 PoA and/or authorize PoA participants. Consequently, it seems reasonable that a Party (especially a host Party) should be able to establish and enforce its national rules and procedure leading to the approval of an A6.4 PoA and the authorization of the entities involved in such an activity. The Parties should be able to collect and examine documents and information about the proposed activity and the involved entities as they consider appropriate and reasonable.</p> <p>The draft documents may be considered as lacking a focus on that important role of a Party. In particular, the proposed regulation may be interpreted as depriving the Parties, and in particular, the host Party, of the right to establish their national rules and procedures required for approving the proposed A6.4 PoAs and authorizing PoA participants. It is recommended that the proposed regulation of the said Section consider the right of a Party to establish and apply its national rules and procedures to be followed by the potential activity participants, as well as establish the Party's specific requirements to be met by the potential activity participants in order for the Party to decide on approving the A6.4 PoAs and authorizing the PoA participants.</p> <p>Exercising such rights by a Party might facilitate the Party's improved selection of A6.4 PoAs and the fulfilment of its reporting obligations (including, inter alia, those set forth in Section IV of Decision 2/CMA.2).</p> <p>2) Given the crucial role of the host Party and the potential impact on its NDC resulting from the implementation of the A6.4 PoA, it is recommended that the proposed regulation considers the host Party's right to exercise the "final say." In particular, the host</p>		

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				<p>Party should have the option to consider another Party's approval/authorization before making its own decision on the approval of the A6.4 PoA and/or the authorization of PoA participants.</p> <p>3) The right of a Party to request and examine additional documents and information, at the Party's discretion, from potential A6.4 PoA participants is recommended to be clearly established</p>		
M	4	4.4, et al	G	<p>According to Para 42 of the RMP, "the host Party shall provide a statement to the Supervisory Body specifying whether it authorizes A6.4ERs issued for the activity for use towards achievement of NDCs and/or for other international mitigation purposes as defined in decision 2/CMA.3. <u>If the host Party authorizes any such uses, the Party may provide relevant information on the authorization, such as any applicable terms and provisions.</u>"</p> <p>The draft documents do not establish any procedure that could be followed by a Party to exercise that right. Therefore, it is recommended that the draft regulation be amended to avoid a possible misinterpretation of the proposed regulation set forth in the draft document with the mentioned rule of the RMP, as well as to avoid a possible limitation of the corresponding rights of a Party. Also, it is important to ensure (by amending the draft document accordingly) that if any such terms and provisions have been provided by a Party, the approved PoAs and CPs comply with those terms and provisions, and that such compliance is confirmed throughout the lifecycle of the PoA/CP.</p>		
M	4, 6, 7	13(h), 22(d), 23, 94, 96, 116, 134(c), 174	G	<p>Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.</p>	<p><u>By way of an example (a non-exhaustive list):</u></p> <p>13(h) The indicative maximum annual amount of GHG emission reductions or net GHG removals, <b>as well as the indicative maximum total amount of GHG emission reductions or net GHG removals</b>, expected to be achieved by CPs that may be included in the PoA during its lifetime as an A6.4 PoA under the Article 6.4 mechanism.</p> <p>22(d) The maximum annual amount of GHG emission</p>	

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					<p>reductions or net GHG removals <b>and the maximum total amount of GHG emission reductions or net GHG removals</b> approved to be achieved by CPs that may be included in the PoA during its lifetime as an A6.4 PoA under the Article 6.4 mechanism;</p> <p>23. If the PoA covers more than one host Party, the approval referred to in paragraph 22 above shall be provided by each of the host Parties, including by indicating the maximum annual amount of GHG emission reductions or net GHG removals, <b>as well as the maximum total amount of GHG emission reductions or net GHG removals</b> expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA.</p> <p>94. If the DOE or activity participants identify that the sum of the estimated annual amount of GHG emission reductions or net GHG removals expected to be achieved by the CP proposed for inclusion and the cumulative annual amount of GHG emission reductions or net GHG removals expected to be achieved by all CPs that have been already included in the PoA is higher than the maximum annual amount of GHG emission reductions or net GHG removals <b>or of the maximum total amount of GHG emission reductions or net GHG removals</b> approved by the host Party under paragraph 22(d) above, the CP shall not be included in the PoA unless a post-registration change to the PoA, as per paragraph 114(a)(iii) below, to increase the annual amount of GHG emission reductions or net GHG removals <b>and the maximum total amount of GHG emission reductions or net GHG removals</b> expected to be achieved by the CPs to be included, is approved by the Supervisory Body.</p>	
M	6	6.4, 6.5, 6.6.4	G	<p>Given the fact that any aspect of the authorized A6.4 PoAs and their participants may be of importance to a Party (and in particular, a host Party), no change relating to PoAs or CPs as described in the draft document be made without a preliminary approval from the Party (and in particular, the host Party).</p> <p>It is recommended that the draft document be amended accordingly.</p>		

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M	6	6.6.2	T	It is recommended that not only “insolvency” and “disputes”-related issues be considered in the context of the proposed regulation, but also any other events (such as, e.g., the liquidation of an activity participant for any reason, etc.) which may lead to the same consequences.		
M	8	181	G	When it comes to the submission of a request for issuance of A6.4ERs, the processing of the uploaded documents should also be automatically stopped if the total number of A6.4ERs requested for issuance under that PoA/CP exceeds the maximum total amount approved by the host Party.	181. Once the documents referred to in paragraph 176 above are uploaded, the secretariat shall through the dedicated interface on the UNFCCC website, automatically check whether the amount of ERs included in the request for issuance will result in the total amount of GHG emission reductions or net removals for the registered PoA being within the maximum annual amount that have been approved by the host Party under paragraph 22(d) above. If the total annual amount exceeds the maximum annual amount, <b>or the total amount exceeds the maximum total amount exceeds the maximum total amount</b> , approved by the host Party, the dedicated interface shall automatically block the processing of the uploaded documents, otherwise, the secretariat shall issue a statement of the issuance fee due (or confirmation that no issuance fee is due), determined in accordance with the	
M	8	8.2.2-8.2.3	G	<p>The proposed regulation is ambiguous regarding the possibility of changing the number of A6.4.ERs to be issued (compared to the number of A6.4ERs requested for issuance in the corresponding request for issuance) as a result of the review process. For example, Paras 210(a) and 215(a) may be interpreted as only allowing either the issuance of the originally requested number of A6.4ERs or the rejection of the request for issuance. The rest of the related regulation is also unclear on that point and only covers the procedure for changing the fees (see Para 219). Overall, there is a lack of regulation in this regard.</p> <p>It is recommended that the proposed regulation be amended to expressly set forth the possibility of changing (e.g., reducing) the number of A6.4ERs as a result of the review process, and to outline the procedure related to such a change.</p>		