

## Call for input 2024: Programme of Activities (PoA) regulatory documents

30 May 2024

Dear Article 6.4 Mechanism team,

Korea Impact Carbon Corporation (KICC) would like to offer our inputs as below for the Supervisory Body's kind consideration, after our careful review of the annotated agenda and related annexes for the eleventh meeting.

**1) Referring to: A6.4-SB011-A05 - Draft standard: Article 6.4 activity standard for programmes of activities (version 02.0)**

**6.9. Authorization of activity participants**

29. Each activity participant shall be authorized by the host Party of the proposed A6.4 PoA or other participating Party through a dedicated interface on the UNFCCC website. If the PoA is hosted by multiple Parties, the authorization by the host Party may be provided by any of the host Parties. At least one activity participant shall be authorized by each of the host Parties.

**A. Design of Programme of Activities Clause 6.9 paragraph 29**

- KICC would like to seek clarification on the applicability of this clause to CDM PoAs that are transitioned to A6.4M.
- For existing CDM PoAs, authorization has already been granted for activity participants. If a CDM PoA transitions to A6.4M, do the existing authorized activity participants need to seek new authorization under A6.4M?
- If new authorization is required under A6.4M, will the requirements outlined in this draft standard for A6.4 mechanism apply? Or will there be separate guidance or procedures specifically for transitioned PoAs?
- If the requirements outlined in this draft are to be followed by the transitioned PoAs, KICC strongly believes that activity participants should obtain authorization solely from the host parties of the transitioned CPs. Requiring authorization from all the host parties under the original CDM PoA would be unreasonable and impractical.

**2) Referring to: a64-sb008-a08\_Procedure\_Transition of CDM activities to the Article 6.4**

## **mechanism**

- In addition to point 1, KICC seeks to provide input on the approval for transitioning CDM projects. While we acknowledge that this topic might not be the focus in this round of input, given the practical challenges experienced by the project participants on the ground at this current moment, we would like to draw SBM's attention to this matter again
- We understand that CPAs of CDM PoA may transition to the Article 6.4 mechanism only in conjunction with the transition of the PoA. And to transit a PoA, according to section 5.3. clause 15 of the transition procedure (a64-sb008-a08\_Procedure\_Transition of CDM activities to the Article 6.4 mechanism), all host parties of the PoA are required to submit approval if there is more than one host Party for a transitioning CDM PoA.
- We would like to suggest that the Supervisory Body make an exception to allow the transition of a PoA by obtaining approval only from the parties with the CPAs that are requested to transit, and not from the host parties with CPAs that are not being requested to transit.
- This is hypothetical but another challenge could happen when a PoA has a large number of host parties. For example, if a PoA has 100 CPAs with 100 host parties, it would be very impractical for a project participant intending to transition only one CPA out of the 100 CPAs to have to obtain approval from all 100 host parties.
- KICC respectfully requests the Supervisory Body's support in making exceptions to this requirement and providing clear condition for exceptions.

### **3) Referring to: A6.4-SB011-A04 - Draft procedure: Article 6.4 activity cycle procedure for programmes of activities (version 02.0)**

24. *[Placeholder for possible provisions on the submission of the statement of authorization on the use of A6.4ERs that will be issued for the proposed A6.4 PoAs towards achievement of NDCs and/or other international mitigation purposes as defined in decision 2/CMA.3]<sup>8</sup>*

#### **A. Host Party approval Clause 4.4 paragraph 24**

- KICC understands that Supervisory Body has placed a placeholder for possible provisions on the submission of the statement of authorization on the use of A6.4ERs. In this section, we propose including a detailed guideline that clarifies the timeline for authorization, the possibility of changing the authorization of use, and the implications or practical steps to follow upon such a change including providing a form to approve/effect changing the authorization of use.

## **11. Withdrawal of approval of a programme of activities or authorization of activity participant**

### **11.1. Submission of withdrawal notification**

274. A host Party of a proposed or registered A6.4 PoA may, through its DNA, submit a notification to the secretariat to withdraw the approval of the PoA or the authorization of any of the activity participants made in accordance with paragraphs 21–22 above at any time through a dedicated interface on the UNFCCC website, providing the following information:
- (a) The PoA title and its unique UNFCCC reference number;
  - (b) The type of withdrawal (withdrawal of the approval of the PoA or withdrawal of the authorization of activity participants);
  - (c) The names of the activity participants to whom the withdrawal of authorization applies (applicable if the withdrawal only relates to the authorization of activity participants);
  - (d) The effective date of the withdrawal, which shall be at least 60 days after the date of notification of the withdrawal unless the host Party specifies an earlier date with justification;
  - (e) The reason(s) for the withdrawal.
275. Other participating Parties may, through their DNAs, withdraw the authorization of the activity participants made in accordance with paragraph 26 above any time through the dedicated interface on the UNFCCC website, providing the information listed in paragraph 274(a)-(e) above.
276. Upon receipt of the withdrawal notification, the secretariat shall promptly inform the affected activity participants of the notification and check whether the information provided is complete. If found incomplete, the secretariat shall request the DNAs of the Parties submitting the withdrawal to provide the missing information.

### **B. Submission of withdrawal notification clause 11.1 paragraph 274-276**

- KICC believes that the secretariat should carefully review the appropriateness of withdrawal notifications by host parties based on stringent rules and conditions. To prevent unreasonable revocation of authorization and approval, KICC strongly support that the secretariat has the authority to deny the withdrawal of authorization/approval by the host parties.