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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

0	1	2	3	4	5	6
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)
M	3	6(d)	G	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) “ A6.4 PoA participant” is a public or private entity that participates in an A6.4 PoA.	
M	3	6(e)	G	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 ACP-PoA (A6.4-SB011-A04) 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 of the interrelated documents.	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 A6.4 projects and PoAs), to demonstrate the additionality of A6.4 projects and PoAs , to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by A6.4 projects and PoAs .	
M	5	14(e), footnote 6	G	It needs additional justification that “credibility” of the information may be confirmed by the fact that it “is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence”.	6 Information is credible if it is authentic and is proved by the facts, established practice, or documented evidences —able to inspire belief or trust, and the willingness of persons to accept the quality of evidence.	

Call for public input			Draft Standard: Article 6.4 validation and verification standard for programme of activities (ver. 02.0)			
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				The proposed characteristics may not be considered as objective and need to be revised.	Information is reliable if the quality of evidence is accurate and credible and able to yield the same results on a repeated basis.	
M	5	14(j)	G	It is not clear how a DOE would comply with a general requirement to “Safeguard the confidentiality of all information obtained or created during the validation or verification”. Especially given that certain information contained in DOE’s reports (including the validation and verification reports) and public documentation must be made public. This provision is recommended to be revised accordingly.		
M	6 et al	6.2, et al	G	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> ”. 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.		
M	6, 7	31(b), 122(a)	G	Since the DOE is supposed to consider the “Compliance with the host Party’s indication of activity types that it would approve”, justification of why the DOE is not obliged to consider compliance with other rules of the host Party applicable to the proposed A6.4 PoA is required, or the proposed regulation be amended accordingly.		
M	6,	35(g),	G	Given the importance of the total number of A6.4ERs	<u>By way of an example (a non-exhaustive list):</u>	

Call for public input [Draft Standard: Article 6.4 validation and verification standard for programme of activities \(ver. 02.0\)](#)

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	8	110(c), 188(d), 192, 198		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>35(g) Whether the A6.4 PoA stipulates the indicative maximum annual amount of GHG emission reductions or net GHG removals, as well as the indicative maximum total amount of GHG emission reductions or net GHG removals, expected to be achieved by CPs that may be included in the PoA for each host Party of the PoA.</p> <p>110(c) A confirmation of the maximum annual amount of GHG emission reductions or net GHG removals and the maximum total amount of GHG emission reductions or net GHG removals that may be achieved by the proposed A6.4 PoA;</p> <p>188(d) To change the design of the PoA such that it may result in an increase in the maximum annual amount of GHG emission reductions or net GHG removals or in the maximum total amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA in each of the host Parties through the inclusion and implementation of CPs, subject to the approval of the host Party;</p> <p>192. If the registered A6.4 PoA has been amended to change the design of the PoA such that it may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals or the maximum total amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA through the inclusion and implementation of CPs, the DOE shall assess and confirm that:</p>	
M	6	77, 78	G	To ensure the PoAs and CPs follow the best practices and consider the most recent developments, the proposed approach is recommended to apply also to the situations when the PoA-related activities are to be implemented after the new methodologies or baselines enter into force.	77. If the generic CP applies a previous versions of a methodology or a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted, or the activities under the proposed A6.4 PoA or CP are likely to occur , after the grace period for applying the previous version in accordance with the validity section of the "Procedure: Development, revision and clarification of methodologies and methodological tools", the DOE shall request the activity participants to provide a revised PoA-DD, applying the latest version of the mechanism methodology or other applicable and valid mechanism methodology, or the standardized	

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					<p>baseline in accordance with the activity standard.</p> <p>78. If the generic CP does not apply a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted, or the activities under the proposed A6.4 PoA or CP are likely to occur, after an applicable approved standardized baseline whose selection is mandatory has become valid and after the grace period for not applying the standardized baseline in accordance with the validity section of the “Procedure: Development, revision, clarification and update of standardized baselines”, the DOE shall request the activity participants to provide a revised PoA-DD, applying the standardized baseline in accordance with the activity standard.</p>	
M	7	156	G	It is recommended to introduce a clear distinction between the “local stakeholders” and “subnational stakeholders” should there is a justified need in distinguishing those two groups of stakeholders.		
M	9, et al	260, 261, et al	G	<p>Since these days encumbrance of mitigation outcomes is possible not only through programmes, or international, national and subnational GHG mitigation crediting schemes, but through private instruments also (e.g., through the use of blockchain solutions not requiring participation of any independent standards/programme operators or authorities of any level), the possibility of double registration of related activities and double counting of resulting mitigation outcomes through such private instruments is recommended to be considered.</p> <p>To avoid potential double counting, issuance and other negative results of any A6.4 activity, an A6.4 PoA / CP is recommended to have no other registrations, not pursue for registration under, nor be included in a programme under any other international, regional, national, or subnational GHG mitigation crediting scheme.</p>	<p><u>By way of an example (a non-exhaustive list):</u></p> <p>260. The DOE shall determine whether the registered A6.4 PoA or any of the included CPs are also registered, or covered by a programme, under any other international, regional, national or subnational or sector-wide GHG mitigation crediting scheme, or other similar initiatives prior to the request for issuance based on the confirmation from such other crediting scheme, if applicable, public information and any other information obtained from the activity participants.</p> <p>261. If the DOE determines that the registered A6.4 PoA or any of the included CPs are registered, or covered by a programme, under another crediting scheme or other similar initiatives, the DOE shall consider it as non-compliance with the requirements set forth in Paragraph 258 above. additionally determine whether the activity participants have obtained a confirmation from the other crediting scheme that the same GHG emission reductions or net GHG removals being requested for issuance of A6.4ERs have not been or will not be credited under the other crediting scheme.</p>	