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Sent: Monday, 7 July, 2025 14:35

To: A6.4 Mechanism - Activity Cycle <A6.4mechanism-activitycycle@unfccc.int>

Subject: Re: Request for review outcome for case 10576 requesting transition

Dear A6.4 Assessment Team,

1. Warm greetings from Accra. I wish to express Ghana's DNA's appreciation for the continued efforts of the Supervisory Body in operationalising the Article 6.4 Mechanism under the Paris Agreement. We also acknowledge the conditional approval of the Programme Activities titled "*Ghana Improved Cookstove Project by EWP in the Republic of Korea*" (Programme Activity Number: 10576) and thank the Body for its engagement in this matter.
2. That said, we write to share our observations following the 16th meeting of the Supervisory Body, particularly concerning the recent changes related to the recalculation of the fraction of non-renewable biomass (fNRB) under the revised procedure "*Transition of CDM Activities to the Article 6.4 Mechanism*" (v.05.0, A6.4-PROC-AC-001), issued on 20 May 2025.
3. **Earlier documentation**—including previous versions of the same procedure—presented the recalculation of fNRB during the transition of CDM activities as an encouraged practice. As such, many host countries and project developers, including Ghana, undertook transition planning based on the understanding that existing approved values could continue to apply or be updated progressively. The recent shift to making recalculation a mandatory condition for issuance under the Article 6.4 Mechanism, while well-intended, has raised some concerns due to the timing and limited opportunity for prior consultation.
6. Specifically, we note that our project had already developed an fNRB value using the best available data at the time of Component Project Activity (CPA) inclusion. This value was approved by the UNFCCC Secretariat and applied for the crediting period from 3 November 2020 to 2 November 2027. The project's structure, including financing and implementation arrangements, was based on the regulatory guidance and procedures in effect at the time.
7. The recent procedural revision introduces a degree of uncertainty for projects that are mid-cycle and already operating under established agreements. While we fully understand and support the importance of methodological robustness and environmental integrity, we respectfully highlight that abrupt changes—particularly

those with retroactive implications—may affect the confidence of host countries and investors in the long-term stability of the mechanism.

8. We kindly recall the principle of legal certainty and non-retroactivity, as reflected in Article 28 of the Vienna Convention on the Law of Treaties. In this context, we respectfully suggest that further reflection be given to how new requirements might be phased in, particularly for projects that have made good-faith efforts to comply with earlier standards.
9. In this regard, we humbly submit the following requests for the Body's kind consideration:
 - a. That the Supervisory Body explore options to mitigate unintended impacts of the new fNRB requirement on already-registered CDM activities, with recognition of efforts made under previous procedural guidance;
 - b. That, given the time-bound operational life of cookstoves installed since 2021, the issuance of associated emission reductions should not be delayed as a result of transitioning fNRB requirements, where credible data and approvals are already in place.
10. We wish to emphasise that this issue is not limited to our national context but may have wider implications for the viability of cookstove-based mitigation activities globally. These projects often deliver significant climate and development co-benefits and depend on a predictable and enabling regulatory environment to attract continued participation and investment.
11. As the Supervisory Body continues to guide the development of the Article 6.4 Mechanism, we encourage the inclusion of transitional arrangements and stakeholder engagement in the design of future policy updates. In particular, we propose:
 - a. That major procedural revisions be accompanied by advance notice and structured dialogue with host countries and project stakeholders;
 - b. That additional clarity and technical guidance be provided to assist project developers in interpreting and applying new requirements, especially in relation to cookstove methodologies.
12. The Government of Ghana remains fully committed to the principles and objectives of the Paris Agreement and the Article 6.4 Mechanism. We appreciate the Body's continued leadership and trust that these reflections will contribute constructively to ongoing deliberations. We also remain available to support any efforts that may help strike a balance between ambition, integrity, and practical implementation in developing countries.
13. Please accept the assurances of our highest consideration.