

From: [REDACTED]
Sent: Thursday, January 15, 2026 3:34 PM
To: A6.4mechanism-info <A6.4mechanism-info@unfccc.int>
Cc: [REDACTED]
[REDACTED]

Subject: Request for clarification and consideration of amendments to certain PACM documents

Dear Supervisory Body,

The Government of Ukraine is currently in the process of developing a national framework for the operationalization of the Article 6 of the Paris Agreement.

In this context, we would like to draw your attention to certain provisions contained in the documents adopted by the Supervisory Body and developed by the Secretariat, namely the Article 6.4 activity cycle procedure for projects (Version 03.0) and the Article 6.4 mechanism registry procedure (Version 02.1), in relation to their consistency with the relevant decisions adopted by the CMA at its sixth session.

In particular, paragraph 163 of the Article 6.4 activity cycle procedure for projects (Version 03.0) provides that the host Party shall communicate its statement of authorization on the use of A6.4ERs for the project by completing the form. The host Party authorization of the use of Article 6.4 emission reductions form for Article 6.4 projects currently constitutes the sole means by which a host Party may indicate whether it authorizes, does not authorize, or allows the issuance of mitigation contribution A6.4ERs for a project, while noting that authorization may be provided at a later stage.

However, paragraph 11 of Decision 6/CMA.6 specifies that the statement of authorization may be included as part of the approval of the Article 6, paragraph 4, activity by the host Party. The host Party approval and authorization of activity participants form for Article 6.4 projects, as currently published on the UNFCCC website, does not include a section to provide such information on authorization.

In light of this, we consider that it would be appropriate to amend the host Party approval and authorization of activity participants form for Article 6.4 projects in order to ensure its full alignment with the provisions of Decision 6/CMA.6 and thereby provide Parties with the possibility to include the statement of authorization directly within the host Party approval.

Furthermore, we wish to draw attention to the Article 6.4 mechanism registry procedure (Version 02.1), which may not fully reflect the flexibility provided by the CMA decisions regarding the timing of authorization by Parties. Specifically, paragraph 52 of the procedure appears to be written under the presumption that the host Party will always submit a statement of authorization prior to the issuance of A6.4ERs. This creates a potential inconsistency in cases where a Party defines the first transfer as authorization that occurs after the issuance of mitigation contribution A6.4ERs, in accordance with its national framework. In such circumstances, the procedure could lead to misalignment between the date of issuance and the date of first transfer.

In this regard, we would appreciate clarification on how the mechanism registry administrator would

act in cases where the host Party provides authorization after issuance and defines the first transfer as authorization, particularly with respect to determining the date when A6.4ERs are considered first transferred, and/or whether the relevant provisions of the Article 6.4 mechanism registry procedure would require revision to accommodate such cases.

Best regards,

A black rectangular redaction box covering the signature of the sender.