

Submission on the Annotated Agenda for the 21st Meeting of the Article 6.4 Supervisory Body

Agenda item: Mandate to the Methodological Expert Panel on large-scale crediting and Programmes of Activities

This submission is provided in response to the annotated agenda for the 21st meeting of the Article 6.4 Supervisory Body (SB21), and in particular paragraph 22, which is the proposed action to provide a mandate to the Methodological Expert Panel (MEP) concerning the preparation of a concept note and revisions to methodological standards and tools for application to programmes of activities (PoAs).

1. Procedural clarity and sequencing of mandates

We wish to raise a procedural consideration regarding mandate clarity, sequencing, and stakeholder engagement.

The Supervisory Body previously requested the MEP to address methodological requirements for large-scale crediting programmes.¹ Consistent with this, the MEP's previously adopted 2026 workplan originally included a concept note on large-scale crediting programmes, with plans to open a call for input at MEP13, and the MEP presented initial considerations on this topic at the MEP12 opening plenary.

However, no call for input was subsequently issued on the draft concept note. More recently, the annotated agenda for SB21 introduces a proposed mandate to the MEP that appears narrower in scope, focusing primarily on the application of existing methodological standards and tools to PoAs, while only noting the earlier mandate on large-scale crediting. In parallel, the revised 2026 MEP workplan to be considered at SB21² indicates that the original body of work on large-scale crediting programmes has been struck-through.

Taken together, these developments risk creating uncertainty as to:

- When the Supervisory Body intends the original mandate on large-scale crediting programmes to be taken forward, and how it will interact with the concept note on PoAs and accompanying revisions to methodological standards and tools;
- Whether PoAs are intended as an initial application case within that broader mandate, or as a standalone and narrower workstream; and
- At what stage, and on what scope, stakeholders will have an opportunity to provide substantive input.

Clarifying these issues would strengthen transparency and help ensure that technical work proceeds on the basis of a shared understanding of objectives and scope.

2. Clarification on 22(b) of the mandate and its process

We further note that, as currently drafted, the proposed action in agenda item 22(b) could be interpreted as solely editing existing standards and tools to make them applicable to PoAs, rather than first assessing whether, and to what extent, those standards and tools are conceptually and technically applicable for at programme scale.

¹ Paragraph 16 of [A6.4-SB009-A01](#)

² [A6.4-SBM021-AA-A02](#)

While this may not reflect the intended interpretation, clarification on this point would be valuable. In particular, we request confirmation that:

- The MEP's work would include an evaluation of the applicability and limitations of existing standards and tools when applied to PoAs and other large-scale approaches, and not solely revision to the documents listed in 22(b) (i)-(vii); and
- Any revisions to standards or tools undertaken under this workstream will be subject to appropriate opportunities for stakeholder input and consideration by the Supervisory Body prior to finalisation.

Such clarification would help ensure that technical work proceeds on the basis of a shared understanding of objectives and scope.

3. Considerations for future work

In offering the above procedural observations, we wish to underline that substantive technical questions do justify careful consideration of how approved Article 6.4 methodological standards and tools function at programme or larger scales.

Experience with scaled approaches indicates that several existing standards and tools were designed around discrete, activity-level assumptions, which may not always translate smoothly to PoAs or other large-scale crediting approaches. Examples include:

- Baseline setting and additionality approaches that assume project-specific investment decisions or homogeneous implementation contexts;
- Common practice and investment analysis tools that rely on statistical independence or uniform benchmarks; and
- Provisions addressing non-permanence and reversals, particularly for removals, that may require reconsideration of risk pooling, buffering, and monitoring arrangements at scale.

Recognising such issues at the concept note stage can help ensure that subsequent revisions preserve environmental integrity while remaining workable for large-scale mitigation programmes.

4. Concluding Remarks

We appreciate the substantial workload facing both the Supervisory Body and the MEP and recognises the importance of timely progress on methodological matters. Clarification by the Supervisory Body at SB21 regarding the scope, timing, and process for work on PoAs and large-scale crediting programmes — including opportunities for stakeholder input — would provide a strong foundation for subsequent technical development and informed decision-making.