



Comment on A6.4-SBM021-AA-A05:

Repurposing the Voluntary Cancellation Platform

Overall position. The proposal is directionally valuable and should be endorsed, subject to a tighter implementation design and explicit market communication plan. A UNFCCC-operated, neutral, no-commission voluntary cancellation channel can preserve the public-interest role created under the CDM, provide a trusted destination for mitigation contribution units (MCUs) and eligible CP2 CERs, and avoid a service gap after discontinuation of CDM registry transactions at end-2026.

The concept note correctly avoids overextending the platform to authorized A6.4ERs/AERs at this stage, as that would introduce additional authorization, transfer and accounting complexity that may delay a practical launch.

Value added. The platform can deliver three distinct benefits:

- (i) continuity for existing project participants and buyers familiar with the CDM voluntary cancellation model;
- (ii) a UN-backed integrity signal in a fragmented voluntary market; and
- (iii) a simple retail-facing route for users seeking contribution claims rather than NDC-use claims. T

he reported historical use of the CDM platform demonstrates proof of concept, but Article 6.4 demand will depend on clarity of claims, visibility of project attributes, and ease of buyer onboarding.

Key challenges. The main risks are not only technical; they are interpretive and reputational.

Users may confuse MCUs, CP2 CERs, A6.4ERs and authorized units unless the platform uses strict labelling, claim language and certificate templates.

Legacy CER quality concerns, vintage sensitivity, host-country positions, corresponding adjustment misconceptions, cybersecurity vulnerabilities, payment migration, data privacy and low early supply all require active mitigation.

The platform should not be perceived as a route to “revalidate” old CERs; it should be positioned as a transparent cancellation service for clearly defined eligible units and permitted voluntary purposes.

Implementation design recommendations. The Supervisory Body should approve a minimum viable repurposing focused on MCUs and eligible CP2 CERs, with modular architecture allowing later expansion only after registry rules and unit-type governance mature.

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The design should include: registry-native unit checks; automated prevention of double listing and duplicate cancellation; public cancellation records; clear distinction between contribution claims and offset/compensation claims; standardized certificates; multilingual buyer guidance; emissions calculator update; seller KYC; transparent fee/no-commission policy; API hooks for approved partners; and a public dashboard showing cancellations by unit type, host Party, activity type and vintage.

A small technical advisory group including project developers, DNAs, VVB/DOE representatives, corporate buyers and registry experts should test user journeys before launch.

Timeline and decision point. A decision no later than SBM 022 is essential. If the decision slips beyond July 2026, the risk of decommissioning, contractual uncertainty and market confusion will increase materially.

Awareness creation and developer engagement. The secretariat should run a targeted outreach campaign for CDM project participants, Article 6.4 activity participants, DNAs, corporate sustainability teams, airlines/travel platforms, exchanges and market intermediaries.

Communications should explain: what units can be listed; what claims buyers may and may not make; how CP2 CER migration works; cancellation timing; evidence/certificate issuance; and how developers can prepare portfolios before CDM registry cut-off. Webinars for major CER host countries, a one-page developer checklist and sample buyer claim language should be issued at least three months before closure.

Specifically UNFCCC should communicate that CERs could be transferred to 6.4 Mechanism Registry without Host Country Approval.

Conclusion. The platform is worth repurposing as a pragmatic, low-friction bridge from CDM-era voluntary cancellation to Article 6.4 contribution-based use.

Approval should be conditional on tight scope control, robust cyber/payment readiness, transparent public records, legally cautious claims guidance and an accelerated outreach programme.

These conditions will protect the Article 6.4 mechanism's credibility while preserving a useful, accessible channel for voluntary climate action.