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Sent: Tuesday, 29 September, 2026 8:05
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Subject: SBM023 – Agenda Item 4.3 (Issuance): Implementation Challenges Related to A6.4-FORM-AC-007

Dear Members of the Supervisory Body,

We would like to thank the Supervisory Body and the Secretariat for their continued efforts in supporting the implementation of the Article 6.4 mechanism and the successful transition of activities from the Clean Development Mechanism (CDM).

We acknowledge that this input is being submitted after the formal deadline for comments on the annotated agenda. However, given the ongoing nature of the issue and its impact on the timely issuance of Article 6.4 units, we respectfully submit this input for the Supervisory Body's consideration. We believe the matter affects multiple stakeholders and would benefit from clarification to facilitate the efficient implementation of the mechanism.

We would like to draw the Supervisory Body's attention to a practical implementation challenge relating to the avoidance of double issuance requirements for transitioned activities under the Article 6.4 mechanism.

As part of the issuance process for transitioned activities, the current requirements call for confirmation from any other crediting scheme under which the activity is also registered that the same emission reductions have not been issued, or requested for issuance, under that scheme. This confirmation is to be provided through A6.4-FORM-AC-007.

While the intent of this requirement is fully understood and supported, stakeholders have encountered difficulties obtaining such confirmations from other crediting standards. In some cases, the relevant standards do not currently have an established process for issuing these declarations, or there are differing interpretations regarding how the confirmation should be provided.

As a result, issuance requests that are otherwise ready for processing may remain incomplete despite project participants making reasonable efforts to comply with the

requirement. This is leading to delays in issuance and creating uncertainty for project developers, credit off-takers, and other stakeholders awaiting the delivery of Article 6.4 units.

Given that the status of issuances and issuance requests may often be independently verified through publicly available registry records and supporting documentation, we respectfully request the Supervisory Body to consider providing clarification on how project participants may demonstrate compliance with the avoidance of double issuance requirements in circumstances where the required confirmation cannot reasonably be obtained from another crediting scheme.

Possible approaches for consideration could include:

- Acceptance of a project participant declaration supported by publicly available registry evidence;
- Alternative forms of evidence demonstrating the avoidance of double issuance that can be independently assessed and verified by the DOE;
- Transitional guidance or interim arrangements until a consistent process is established across crediting mechanisms.

We respectfully request the Supervisory Body's guidance on this matter, as greater clarity would help facilitate the timely processing of issuances while maintaining the environmental integrity objectives of the Article 6.4 mechanism.

Thank you for considering this input. We remain available to provide any additional information that may assist the Supervisory Body in its deliberations.

Best Regards

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