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Draft Standard

Article 6.4 mechanism validation and verification standard for projects

Version 02.0

DRAFT



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1. Introduction

1.1. Background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), at its third session, adopted rules, modalities and procedures (RMPs) for the mechanism established by Article 6, paragraph 4, of the Paris Agreement (the Article 6.4 mechanism)¹ and requested the Supervisory Body, among others, to develop provisions for the development and approval of methodologies, validation, registration, monitoring, verification and certification, issuance, renewal, first transfer from the mechanism registry, voluntary cancellation and other processes pursuant to chapters V.B–L and VIII of the RMPs.²
2. The CMA, at its fourth session, elaborated some elements of the RMPs relating to the operation of the activity cycle of the Article 6.4 mechanism.³

1.2. Objectives

3. The objective of the “Article 6.4 mechanism validation and verification standard for projects” (hereinafter referred to as the standard) is to set out requirements relating to validation and verification for Article 6.4 mechanism projects (A6.4 projects).

2. Scope and entry into force

2.1. Scope

4. This standard provides designated operational entities (DOEs) with minimum requirements for validation of a proposed or registered A6.4 project of its compliance with the relevant design requirements and other attributes for registration, post-registration change and renewal, as well as for verification of greenhouse gas (GHG) emission reductions or net GHG removals achieved by a registered A6.4 project.

2.2. Entry into force

5. Version 01.0 of this standard enters into force on [1 January 2024].

3. Terms and definitions

6. The following terms apply in this standard:
 - (a) “Shall” is used to indicate requirements to be followed;
 - (b) “Should” is used to indicate that among several possibilities, one course of action is recommended as particularly suitable;

¹ Decision 3/CMA.3, annex, available at:

https://unfccc.int/sites/default/files/resource/cma2021_10_add1_adv.pdf#page=25

² Decision 3/CMA.3, paragraph 5(a).

³ Decision 7/CMA.4, annex I, chapters III–VI, available at:

https://unfccc.int/sites/default/files/resource/cma2022_10a02_adv.pdf#page=33

- (c) “May” is used to indicate what is permitted;
- (d) “Activity participant” is a public or private entity that participates in an A6.4 project.

4. Principles

4.1. General

- 7. The following principles⁴ guide the preparation, execution, and reporting of validation and verification activities.

4.2. Impartiality

- 8. Design and execute the validation or verification activity so that it is objective and does not introduce bias.

4.3. Evidence-based approach

- 9. Ensure that the validation or verification activity employs a rational method for reaching reliable and reproducible validation or verification conclusions and is based on sufficient and appropriate evidence.

4.4. Fair presentation

- 10. Ensure that the validation or verification activity, findings, conclusions and reports are truthfully and fairly presented. Report significant obstacles encountered during the validation or verification, as well as unresolved, diverging opinions among validators or verifiers, to the responsible party (e.g. the secretariat/the Supervisory Body) and the client (e.g. the activity participants).

4.5. Documentation

- 11. Document the validation or verification and ensure it establishes the basis for the conclusion and conformity with the criteria.

4.6. Conservativeness

- 12. When assessing comparable alternatives, use a selection that is cautiously moderate.

5. General validation and verification requirements

5.1. Validation and verification approach

- 13. The DOE shall select a competent team to perform the validation or verification for the A6.4 project in accordance with the “Standard: Article 6.4 mechanism accreditation”.

⁴ This text is taken from ISO 14064-3:2019 - Greenhouse gases - Part 3: Specification with guidance for the validation and verification of greenhouse gas assertions and is reproduced with the permission of the International Organization for Standardization, ISO. This standard can be obtained from any ISO member from the website of the ISO Central Secretariat at the following address: <www.iso.org>. Copyright remains with ISO.

14. In carrying out its validation or verification work, the DOE shall:
- (a) Follow this standard and integrate its provisions into the DOE's own quality management systems;
 - (b) Apply the most recent applicable decisions and guidance provided by the Supervisory Body;
 - (c) Determine whether each proposed or registered A6.4 project meets all applicable Article 6.4 mechanism rules and requirements, including those specified in the "Article 6.4 mechanism activity standard for projects", the selected methodologies, the selected standardized baselines and any other standards, methodologies, methodological tools and guidelines applied in accordance with the selected methodologies (hereinafter "any other standards, methodologies, methodological tools and guidelines (to be) applied in accordance with the selected (applied) methodologies" are collectively referred to as the other (applied) methodological regulatory documents);
 - (d) Assess the accuracy, conservativeness, relevance, completeness, consistency and transparency of the information provided by the activity participants;⁵
 - (e) Determine whether information provided by the activity participants is reliable and credible;⁶
 - (f) Apply consistent validation/verification criteria:
 - (i) To the requirements of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents throughout the crediting period(s);
 - (ii) To A6.4 projects with similar characteristics such as a similar application of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents, use of technology, time period or region;
 - (iii) To expert judgements, over time and among A6.4 projects;
 - (g) Base its findings and conclusions on objective evidence and conduct all validation or verification activities in accordance with Article 6.4 mechanism rules and procedures;
 - (h) Not omit evidence that is likely to alter the validation or verification opinion;
 - (i) Present information in the validation report or verification and certification report in a factual, neutral and coherent manner and document all assumptions, provide references to background material, and identify changes made to the documentation;
 - (j) Safeguard the confidentiality of all information obtained or created during the validation or verification;

⁵ Principles for each can be found in the "Article 6.4 mechanism activity standard for projects".

⁶ Information is credible if it is authentic and is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence. Information is reliable if the quality of evidence is accurate and credible and able to yield the same results on a repeated basis.

- (k) Conduct a thorough and independent assessment against the applicable Article 6.4 mechanism rules and requirements.

5.2. Use of and compliance with applicable standards

- 15. In carrying out its validation and verification work, the DOE shall use and determine the compliance with the valid version of applicable standards, methodologies, standardized baselines, methodological tools, guidelines and other regulatory documents adopted by the CMA or the Supervisory Body.

5.3. Use of applicable forms

- 16. The DOE shall determine whether the activity participants completed the valid version of the relevant forms by following the instructions therein.
- 17. The DOE contracted to conduct validation for registration of a proposed A6.4 project, post-registration changes or renewal of the crediting period of a registered A6.4 project shall prepare a validation report using the valid version of the relevant validation report form⁷ and following the instructions therein.
- 18. The DOE contracted to conduct verification and certification of the implementation of the registered A6.4 project and monitored GHG emission reductions or net GHG removals shall prepare a verification and certification report using the valid version of the relevant verification and certification report form⁸ and following the instructions therein.

5.4. Use of applicable global warming potentials

- 19. The DOE shall determine whether the global warming potentials (GWPs) were correctly applied in the project design document (PDD) and in the monitoring report in accordance with relevant requirements in the “Article 6.4 mechanism standard for projects”.

6. Validation for registration of projects

6.1. General requirements

6.1.1. Overarching requirement

- 20. The DOE shall determine whether the proposed A6.4 project complies with all relevant requirements in the “Article 6.4 mechanism activity standard for projects” for registration of the project under the Article 6.4 mechanism.

6.1.2. Standard auditing techniques

- 21. The DOE shall assess the information provided by the activity participants.
- 22. In assessing the information, the DOE shall apply the means of validation specified throughout this standard and, where appropriate, standard auditing techniques, including, but not limited to:
 - (a) Document review, involving:

⁷ All types of validation report forms are available on the UNFCCC website.

⁸ All types of verification and certification report forms are available on the UNFCCC website.

- (i) A review of data and information;
 - (ii) Cross checks between the information provided in the PDD and information from sources other than those used; if available, the DOE's sectoral or local expertise; and, if necessary, independent background investigations;
 - (b) Follow-up actions (e.g. on-site inspection and telephone or e-mail interviews), including:
 - (i) Interviews with relevant stakeholders in the host country, such as personnel with knowledge of the project design and implementation;
 - (ii) Cross checks between information provided by interviewed personnel (i.e. by checking sources or other interviews) to ensure that no relevant information has been omitted;
 - (c) Reference to available information relating to projects or technologies similar to the proposed A6.4 project under validation;
 - (d) Review, based on the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents, of the appropriateness of formulae and accuracy of calculations;
 - (e) Sampling approach in accordance with the "Standard for sampling and surveys for Article 6.4 mechanism activities".
23. It is mandatory for the DOE to conduct an on-site inspection at validation for the proposed A6.4 project if:
- (a) Its estimated annual average of GHG emission reductions or net GHG removals is more than [50,000] [100,000] t CO₂ eq; or
 - (b) There is pre-project information that is relevant to the requirements for registration of the project and may not be traceable after the implementation of the project;
 - (c) The project is deemed to have high risk of uncertainty in terms of the achievement of GHG emission reductions or net GHG removals as estimated in the PDD, to be determined in accordance with the relevant guidance to be provided by the Supervisory Body.
24. For cases that are not referred to in paragraph 23 above, it is optional for the DOE to conduct an on-site inspection at validation. If the DOE does not conduct an on-site inspection as a means of validation, it shall describe the alternative means used and justify that they are sufficient for the purpose of validation. If the DOE conducts a remote inspection as an alternative means to an on-site inspection, the DOE should follow the guidance contained in appendix 1.
25. Where no specific means of validation is specified, the DOE shall apply the standard auditing techniques described in paragraph 22 above.

6.1.3. Corrective action requests, clarification requests and forward action requests

26. If the DOE identifies issues that require further elaboration, research or expansion in order to determine whether the proposed A6.4 project meets the relevant Article 6.4 mechanism rules and requirements, the DOE shall ensure that these issues are accurately identified, formulated, discussed and concluded in the validation report.

27. The DOE shall raise a corrective action request (CAR) if one of the following situations occurs:
- (a) Mistakes have been made by the activity participants that will influence the ability of the proposed A6.4 project to achieve real, measurable, verifiable and additional GHG emission reductions or net GHG removals;
 - (b) The applicable Article 6.4 mechanism rules and requirements have not been met;
 - (c) There is a risk that GHG emission reductions or net GHG removals cannot be monitored or calculated.
28. The DOE shall raise a clarification request (CL) if the information provided by the activity participants is insufficient or not clear enough to determine whether the applicable Article 6.4 mechanism rules and requirements have been met.
29. The DOE shall raise a forward action request (FAR) if issues related to project implementation that require review during the first verification after the validation of the proposed A6.4 project are identified. The DOE shall not raise a FAR that relates to the Article 6.4 mechanism rules and requirements for registration of the project.
30. The DOE shall resolve or “close out” CARs and CLs only if the activity participants rectify the project design and/or the PDD, or provide additional explanations or evidence that satisfy the DOE’s concerns. If this is not done, the DOE shall not submit a request for registration of the proposed A6.4 project.
31. The DOE shall report on all CARs, CLs and FARs in its validation report. This reporting shall explain the issues raised, the responses provided by the activity participants, the means of validation of such responses and references to any resulting changes in the PDD or its supporting documents.

6.2. Validation of compliance with specific requirements for registration

6.2.1. General

32. The DOE shall determine, by following the general validation requirements referred to in sections 5 and 6.1 above, whether the proposed A6.4 project complies with all relevant requirements for registration as contained in the “Article 6.4 mechanism activity standard for projects”, including the requirements on:
- (a) Notification of prior consideration of the Article 6.4 mechanism;
 - (b) Compliance with the host Party’s indication of activity types that it would approve;
 - (c) Description of the project;
 - (d) Avoidance of double or revived registration;
 - (e) Selection of methodologies and standardized baselines and their applicability to the project;
 - (f) Deviation from, or revision of, the selected methodology or methodological tool, if applicable;

- (g) Application of methodologies and standardized baselines, including in terms of:
 - (i) Definition of the project boundary, identification of sources, sinks and GHGs included in the project boundary, and identification of leakage;
 - (ii) Identification of baseline scenario;
 - (iii) Demonstration of additionality;
 - (iv) Assessment of the risk of non-permanence of GHG emission reductions or net GHG removals and measures to address reversals if they occur;
 - (v) Estimation of GHG emission reductions or net GHG removals;
 - (vi) Monitoring plan;
 - (h) Specification of start date, crediting period type and duration;
 - (i) Analysis of environmental impacts, social impacts and sustainable development of cobenefits;
 - (j) Undergoing local or subnational stakeholder consultation;
 - (k) Undergoing global stakeholder consultation;
 - (l) Approval of the project by the host Party;
 - (m) Authorization of activity participants by the host Party and other participating Parties;
 - (n) Preparation of modalities of communication statement.
33. When validating the compliance of the proposed A6.4 project with the requirements for registration referred to in paragraph 32 above, the DOE shall additionally follow the specific guidance on validation regarding some of these requirements provided in sections 6.2.2–6.2.11 below.

6.2.2. Avoidance of double or revived registration

34. The DOE shall determine the compliance with the requirement based on the publicly available information and/or the information provided by the activity participants upon its request.

6.2.3. Selection of methodologies and standardized baselines

35. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are compatible with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs, if applicable.
36. If the DOE, based on local and sectoral knowledge, is aware that comparable information is available from credible sources other than that used in the PDD, it shall cross-check the PDD against such other sources to confirm that the A6.4 project meets the applicability conditions of the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents.

37. [The DOE shall determine whether the proposed A6.4 project has selected the standardized baselines where their selection is mandatory.]
38. If the DOE cannot determine the applicability of a selected methodology, methodological tool and/or standardized baseline to the proposed A6.4 project, the DOE shall request a clarification on the applicability in accordance with the “Procedure: Development, revision and clarification of methodologies and methodological tools” and/or the “Procedure: Development, revision, clarification and update of standardized baselines”.

6.2.4. Deviation from methodology or methodological tool

39. The DOE may seek a clarification from the Supervisory Body on the acceptability of a deviation from the selected approved methodology or methodological tool in accordance with the “Procedure: Development, revision and clarification of baseline and monitoring methodologies and methodological tools” prior to the submission of a request for registration, if the DOE, when performing validation of the proposed A6.4 project, or upon request from the activity participants, finds that, due to a project-specific⁹ issue implying that a revision of the methodology and/or methodological tool would not be required to address the issue, the project deviated from:
- (a) The selected methodology or methodological tool; or
 - (b) Sections in the selected methodology or methodological tool that are not standardized by the selected standardized baselines, if the proposed A6.4 project applies standardized baselines.
40. The DOE shall submit an assessment of the case including demonstration that the deviation does not require revision of the selected methodology or methodological tool, and shall include a description of the impact of the deviation on GHG emission reductions or net GHG removals by the proposed A6.4 project.
41. Alternatively, if the DOE considers that a revision of the selected methodology or methodological tool would be required to address the project situation, then the DOE shall

⁹ Examples of project-specific issues include, but are not limited to, the following:

- (a) The methodology requires measurements using instrumentation of certain specifications or using a certain method. The activity participants of the proposed A6.4 project face a difficulty in acquiring the specified instrumentation or a difficulty in implementing the measurement method; however, they can achieve comparable accuracy of measured parameters using an alternative instrumentation or measurement method;
- (b) A proposed A6.4 project does not have an access to the data sources specified by the methodology for a certain parameter; a different source of data can be accessed by the project to estimate the parameter with equal reliability and accuracy;
- (c) A minor deviation is sought for a project-specific situation, which is well justified and conservative. For example: a methodology requires limiting production in the project scenario between +/- 5% of rated capacity, if the historical baseline is to be applied. Due to government restrictions, the plant has never been operated at its rated capacity but at a capacity which is much below its rated capacity (20% below the rated capacity). A deviation can be presented specifying conservative approaches to calculate the emission reduction in such a project-specific case;
- (d) A conservative estimation technique or default factor suggested addressing uncertainties related to project-specific situations, which are not addressed in the methodology. For example, a well-justified conservative uncertainty factor proposed to be used in equations of baseline emissions to address uncertainties in the real-life situation during the crediting period.

submit, or shall request the activity participants to submit, a request for revision of the selected methodology or methodological tool in accordance with the “Procedure: Development, revision and clarification of methodologies and methodological tools”.

6.2.5. Application of methodologies and standardized baselines

6.2.5.1. Host Party methodological requirements

42. The DOE shall determine whether the selected methodologies, the selected standardized baselines and the other applied methodological regulatory documents are applied in a way to comply with the methodological requirements that may be specified by the host Party in accordance with paragraph 27(a) of the RMPs, if applicable.

6.2.5.2. Project boundary, sources, leakage and greenhouse gases

43. If the applied methodologies and the applied standardized baselines allow the activity participants to choose whether a source or gas is to be included within the project boundary, the DOE shall determine whether the activity participants have justified that choice and whether the justification provided is reasonable.
44. If the DOE identifies emission sources that will be affected by the implementation of the proposed A6.4 project and which are expected to contribute more than 1 per cent of the overall expected average annual GHG emission reductions or net GHG removals, and are not addressed by the applied methodologies or the applied standardized baselines, the DOE shall request a clarification of, revision to, or deviation from, the methodologies or the standardized baselines, as appropriate, in accordance with the “Procedure: Development, revision and clarification of baseline and monitoring methodologies and methodological tools” or the “Procedure: Development, revision, clarification and update of standardized baselines”.

6.2.5.3. Baseline scenario

45. If the applied methodologies require several alternative scenarios to be considered in the identification of the most plausible baseline scenario, the DOE shall, based on its expertise and local and sectoral knowledge, determine whether all scenarios that are considered by the activity participants and any scenarios that are supplementary to those required by the methodologies, are realistic and credible in the context of the proposed A6.4 project and that no alternative scenario has been excluded.
46. The DOE shall determine whether the most plausible baseline scenario identified is reasonable by validating the assumptions, calculations and rationales used in the PDD.
47. [Notwithstanding of paragraphs 45–46 above, if the proposed A6.4 project applies an approved standardized baseline that standardizes the baseline scenario, the DOE shall determine whether the baseline scenario for the project is the scenario specified by the applied standardized baseline.]

6.2.5.4. Demonstration of additionality

48. The DOE shall determine whether the additionality of the proposed A6.4 project is demonstrated in accordance with the applied methodologies, the applied standardized baselines and the applied methodological tools for demonstration of additionality, if any, by verifying the reliability and credibility of all data used, and rationales, assumptions and

justifications provided by the activity participants, and critically assessing the evidence presented, using local knowledge and sectoral and financial expertise.

49. [Notwithstanding of paragraph 48 above, if the proposed A6.4 project applies an approved standardized baseline that standardizes additionality, the DOE shall determine whether the project meets the additionality criteria (e.g. positive lists of technologies) in the applied standardized baseline.]

6.2.5.5. Estimation of emission reductions or net removals

50. Where the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents allow for selection between options for equations or parameters, the DOE shall determine whether adequate justification has been provided (based on the choice of the baseline scenario, context of the proposed A6.4 project and other evidence provided) and that the correct equations and parameters have been used, in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.

51. The DOE shall verify the justification given in the PDD for the choice of data and parameters used in the equations as follows:

- (a) **Data and parameters fixed ex ante:** If data and parameters will not be monitored throughout the crediting period of the proposed A6.4 project but have already been determined and will remain fixed throughout the crediting period, the DOE shall determine whether all data sources and assumptions are appropriate and calculations are correct as applicable to the proposed A6.4 project, and will result in an accurate or otherwise conservative estimate of GHG emission reductions or net GHG removals. If the applied methodologies require that any of these data and parameters be determined in accordance with the “Standard for sampling and surveys for Article 6.4 activities”, the DOE shall determine whether the sampling efforts were undertaken in accordance with this standard;
- (b) **Data and parameters to be monitored:** If data and parameters will be monitored or estimated on implementation and hence become available only after validation of the proposed A6.4 project, the DOE shall determine whether the estimates provided in the PDD for these data and parameters are reasonable;
- (c) If the applied methodologies require that any of the data, parameters or estimates be determined based on sampling in accordance with the “Standard for sampling and surveys for Article 6.4 mechanism activities”, the DOE shall determine whether the sampling efforts were undertaken in accordance with such standard.

6.2.5.6. Monitoring plan

52. The DOE shall determine whether the monitoring plan is feasible to implement, including the feasibility of the monitoring arrangements, and whether the means of implementation of the monitoring plan, including the data management and quality assurance and quality control procedures, are sufficient to ensure that GHG emission reductions or net GHG removals can be reported ex post and verified.

53. If the activity participants chose to delay the submission of the monitoring plan for the proposed A6.4 project in accordance with the “Article 6.4 mechanism activity standard for projects”, the DOE shall confirm and document that the submission of the monitoring plan is delayed.

6.2.6. Crediting period type and duration

54. The DOE shall determine whether the type (i.e. renewable or fixed) and the length of the crediting period of the proposed A6.4 project are in line with those that may be specified by the host Party in accordance with paragraph 27(b) of the RMPs, if applicable.

6.2.7. Local and subnational stakeholder consultation

55. The DOE shall request the designated national authority (DNA) of the host Party of the proposed A6.4 project to forward to the DOE complaints received by the DNA from stakeholders on the handling of the outcome of the local or subnational stakeholder consultation (hereinafter collectively referred to as local stakeholder consultation), if any. In this case, the DOE shall promptly forward such complaints to the activity participants and subsequently determine whether the activity participants have taken due account of the complaints and modify the PDD as appropriate. If the DNA has not forwarded any such complaints to the DOE within 30 days of the request, the DOE shall conclude that there is no such complaint.

6.2.8. Global stakeholder consultation

56. The DOE shall determine whether authentic and relevant comments submitted in the global stakeholder consultation and published on the UNFCCC website in accordance with the “Article 6.4 mechanism activity cycle procedure for projects” have been taken into due account in the PDD of the proposed A6.4 project.

6.2.9. Integrity safeguards

57. The DOE shall determine whether the activity participants prepared a declaration on the development, implementation or operation of the proposed A6.4 activity does not involve any illegal activities as per the host and other participating Party rules, including money laundering, tax evasion, fraud, bribery and criminal activities.

6.2.10. Approval and authorization

58. The DOE shall determine whether the DNA of the host Party of the proposed A6.4 project has provided an approval of the project to the Supervisory Body through the dedicated interface on the UNFCCC website in accordance with the “Article 6.4 mechanism activity cycle procedure for projects”.
59. The DOE shall determine whether each activity participant of the proposed A6.4 project listed in the PDD has been authorized to participate in the project by the host Party or other participating Party through the dedicated interface on the UNFCCC website in accordance with the “Article 6.4 mechanism activity cycle procedure for projects”.

6.2.11. Modalities of communication

60. The DOE shall validate the corporate identity of all activity participants and focal points included in the Modalities of Communication (MoC) statement prepared in accordance with the “Article 6.4 mechanism activity cycle procedure for projects”, as well as the personal identities, including specimen signatures and employment status, of their authorized signatories through:

- (a) Directly checking evidence of corporate and personal identities and other relevant documentation;

- (b) Notarized documentation; or
 - (c) Written confirmation from the activity participant that submits the MoC statement that all corporate and personal details, including specimen signatures, are valid and accurate, ensuring that:
 - (i) The MoC statement is received from the activity participant with whom the DOE has a contractual relationship;
 - (ii) The official who submits the MoC statement to the DOE and the official who signed the written confirmation (if a different person) are duly authorized to do so on behalf of the respective activity participant.
61. If the DOE is unable to validate the requirements by applying subparagraphs 60(a)–(c), the DOE may perform further validation activities in order to confirm that the corporate and personal details, employment status and specimen signatures included in the MoC statement are valid and accurate, and comply with the requirements in this section.
62. The DOE shall confirm that the activity participants' authorized signatories signing the MoC statement correspond to the activity participants' authorized signatories included in its annex.

6.3. Validation report

63. The DOE shall report the results of its assessment in the validation report, including the following:
- (a) An executive summary of the validation process and its conclusions;
 - (b) Details of the validation team, technical experts and internal technical reviewers involved, together with their roles in the validation activity and, where conducted in accordance with paragraph 23 or 24 above, details of who conducted the on-site inspection;
 - (c) A list of interviewees, documents reviewed, sampling approaches used by the DOE and, where conducted in accordance with paragraph 23 or 24 above, outline of the on-site inspection. If the DOE applied a sampling approach to the on-site inspection, the DOE shall include a description of how the sample size was determined and how the field check was carried out;
 - (d) Results of the dialogue between the DOE and the activity participants, as well as any adjustments made to the project design following the local and global stakeholder consultations;
 - (e) The applied approach, finding and conclusion in the assessment of compliance with each requirement for registration conducted in accordance with sections 6.16.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them;
 - (f) Information on quality control within the team and in the validation process;
 - (g) A validation opinion, providing:
 - (i) A summary of the validation method and the process used and the validation criteria applied;

- (ii) A summary of the validation conclusions;
 - (iii) A statement on the validation of the estimated GHG emission reductions or net GHG removals;
 - (iv) A statement on whether the proposed A6.4 project meets all applicable Article 6.4 mechanism rules and requirements, including reasons.
64. The DOE shall notify the activity participants the validation outcome, containing:
- (a) A positive validation opinion and the date of submission of the validation report as part of the request for registration of the proposed A6.4 project to the secretariat; or
 - (b) A negative validation opinion, including the reasons for the proposed A6.4 project, as documented, having been determined as not complying with the relevant requirements for registration.

7. Validation of post-registration changes

7.1. General requirements

7.1.1. Overarching requirement

65. The DOE shall determine whether the proposed or actual post-registration change to the registered A6.4 project complies with the relevant requirements in the “Article 6.4 mechanism activity standard for projects” on post-registration changes.

7.1.2. Other requirement

66. If the revised PDD is prepared using a later valid version of the PDD form than the version used for the registered PDD, the DOE shall determine whether the information that is not affected by the post-registration change has been transferred to the later valid version of the form and is materially the same as that in the registered PDD.

7.2. Validation of compliance with specific requirements for post-registration changes

7.2.1. General

67. The DOE shall determine, by following the general validation requirements referred to in sections 5 and 6.1 above mutatis mutandis and section 7.1 above, whether the proposed or actual post-registration change to a registered A6.4 project falls within one of the following types of changes that may be allowed and complies with the respective requirements for post-registration changes contained in the “Article 6.4 mechanism activity standard for projects”:
- (a) Temporary deviations from the registered monitoring plan, applied methodologies, standardized baselines or other methodological regulatory documents;
 - (b) Permanent changes:
 - (i) Corrections;
 - (ii) Inclusion of monitoring plan;

- (iii) Permanent changes to the registered monitoring plan, or permanent deviation of monitoring from the applied methodologies, standardized baselines or other methodological regulatory documents;
- (iv) Changes to the project design.

68. When validating the compliance of the proposed or actual post-registration change with the relevant requirements for post-registration change, the DOE shall additionally follow the specific guidance on validation for some types of post-registration changes provided in sections 7.2.2–7.2.3 below.

7.2.2. Temporary deviations from the registered monitoring plan, applied methodologies, standardized baselines or other methodological regulatory documents

69. The DOE shall determine whether there is a temporary deviation from the monitoring plan in the registered PDD (hereinafter referred to as the registered monitoring plan), the applied methodologies, the applied standardized baselines, or the other applied methodological regulatory documents and, if there is, the DOE shall determine whether the temporary deviation complies with the relevant requirements in the “Article 6.4 mechanism activity standard for projects”.

70. If the deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines is applicable to the monitoring period under verification and part of the previous or subsequent monitoring period, the DOE shall determine the exact period to which the deviation applies.

7.2.3. Permanent changes

7.2.3.1. Corrections

71. If the activity participants have made corrections to project information or parameters fixed at registration of the A6.4 project as described in the registered PDD, the DOE shall determine whether:

- (a) The corrected information is an accurate reflection of actual project information; and/or
- (b) The corrected parameters are in accordance with the applied methodologies, the registered monitoring plan, the applied standardized baselines and the other applied methodological regulatory documents.

7.2.3.2. Inclusion of monitoring plan

72. If the activity participants chose to omit a monitoring plan at registration of the A6.4 project and wish to include it thereafter, the DOE shall determine whether the design of the monitoring plan and other sections of the PDD comply with the relevant requirements in the “Article 6.4 mechanism activity standard for projects” in accordance with the relevant requirements contained in section 6.2.5 above.

7.2.3.3. Permanent changes to the registered monitoring plan, or permanent deviation of monitoring from the applied methodologies, standardized baselines or other methodological regulatory documents

73. The DOE shall determine whether the permanent change to the registered monitoring plan described in the revised PDD are in compliance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
74. The DOE shall determine whether the permanent change to the registered monitoring plan or the permanent deviation of the monitoring from the applied methodologies, the applied standardized baselines, or the other applied methodological regulatory documents is likely to lead to a reduction in the accuracy of the calculation of GHG emission reductions or net GHG removals, and if so, the DOE shall request the activity participants to apply conservative assumptions or discount factors to the calculations to the extent required to ensure that GHG emission reductions or net GHG removals will not be over-estimated as a result of the permanent change or the permanent deviation.

7.2.3.4. Changes to the project design

75. In case of an actual change, the DOE shall, in its judgement, by means of an on-site inspection or remote inspection and review of the revised PDD submitted by the activity participants that describes the nature and extent of the actual change, determine whether this description accurately reflects the implementation, operation and monitoring of the modified A6.4 project.
76. The DOE shall, by means of an on-site inspection or remote inspection, assess the impacts of the actual change on the monitoring plan, the level of accuracy of the monitoring activity, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
77. The DOE shall, by means of reviewing the revised PDD against applicable methodological requirements, determine whether the proposed or actual change would adversely affect the conclusions of the validation report of the registered PDD with regard to:
- (a) The applicability and application of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents with which the A6.4 project has been registered;
 - (b) The project boundary and any implications on the inclusion or exclusion of emission sources or removal sinks and leakage emissions;
 - (c) The compliance of the monitoring plan with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
 - (d) The level of accuracy and completeness of the monitoring compared with the requirements contained in the registered monitoring plan, including the frequency of measurements, the quality of monitoring equipment (e.g. calibration requirements, the quality assurance and quality control procedures);
 - (e) The additionality of the project.

78. If the proposed or actual change affects the additionality of the registered A6.4 project, the DOE shall confirm that [*Placeholder to reflect additionality requirements under the Article 6.4 mechanism*].
79. [Notwithstanding of paragraph 78 above, if the registered A6.4 project applies an approved standardized baseline that standardizes additionality and if the proposed or actual changes affect the additionality of the project, the DOE shall determine whether the project with the changes meets the additionality criteria (e.g. positive list of technologies) in the applied standardized baseline.]
80. The DOE shall determine whether the revised PDD complies with all the requirements of the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents.
81. If the applied methodologies and/or standardized baselines have been updated to a later valid version of them, or changed to other methodologies or standardized baselines, the DOE shall confirm that the revised PDD meets all requirements of the updated/changed methodologies, including the standards, methodological tools and guidelines applied in accordance with the updated/changed methodologies, and/or the updated/changed standardized baselines.
82. The DOE shall confirm the date when the change occurred, the reasons for the change, whether the change would have been known prior to the registration of the A6.4 project, and determine how the change would impact on the overall operation/ability of the A6.4 project to deliver GHG emission reductions or net GHG removals as stated in the registered PDD, and whether the revised estimation of GHG emission reductions or net GHG removals due to the change takes into account the applicable limits in accordance with the “Article 6.4 mechanism standard for projects”.
83. In validating the revised PDD containing the proposed or actual change, and in preparing the validation report, the DOE shall include information on how the findings of previous verification and certification reports, if any, have been taken into account.

7.3. Validation report

84. In its validation report for the post-registration changes, the DOE shall:
- (a) Report on all items listed in paragraph 63 above except for paragraph 63(e) above;
 - (b) Provide all its applied approaches, findings and conclusion on the assessment of:
 - (i) Whether the revised PDD is prepared using the valid version of the applicable form and following the instructions therein, as applicable;
 - (ii) Whether the information transferred to the later valid version of the PDD is materially the same as that in the registered PDD, as applicable;
 - (iii) Whether the revised PDD is prepared in both track-change and clean versions;
 - (iv) The compliance of the proposed or actual post-registration change with the requirement for post-registration change conducted in accordance with sections 7.1–7.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them.

85. The DOE shall notify the activity participants the validation outcome, containing:
- (a) A positive validation opinion and the date of submission of the validation report as part of the request for approval of post-registration change to the secretariat; or
 - (b) A negative validation opinion, including the reasons for the post-registration change as documented having been determined as not complying with the relevant requirements for post-registration changes.

8. Verification of implementation and monitoring

8.1. General requirements

8.1.1. Overarching requirements

86. The DOE shall:
- (a) Determine whether the registered A6.4 project has been implemented and is operating in accordance with the registered PDD;
 - (b) Determine whether GHG emission reductions or net GHG removals have been monitored in accordance with the registered monitoring plan.

8.1.2. Other requirements

87. The DOE shall assess both quantitative and qualitative information on GHG emission reductions or net GHG removals provided in the monitoring report.¹⁰
88. In addition to the monitoring documentation, the DOE shall review:
- (a) The registered PDD, including the registered monitoring plan and/or the changes from the registered PDD, and the corresponding validation opinion;
 - (b) The validation report;
 - (c) Previous verification and certification reports, if any;
 - (d) The applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
 - (e) The monitoring results of environmental impacts, social impacts and sustainable development co-benefits of the registered A6.4 project;
 - (f) Any other information and references relevant to the GHG emission reductions or net GHG removals by the registered A6.4 project (e.g. IPCC reports, data on electricity generation in the national grid or laboratory analysis and national regulations).
89. In addition to reviewing the monitoring documentation, the DOE shall determine whether the activity participants have addressed the FARs identified during validation or previous verification(s).

¹⁰ Quantitative information comprises the reported numbers in the monitoring report. Qualitative information comprises information on internal management controls, calculation procedures, procedures for transfer of data, frequency of the monitoring reports, and review and internal audit of calculations.

8.1.3. Quality of evidence

90. When verifying the reported GHG emission reductions or net GHG removals, the DOE shall confirm that there is an audit trail that contains the evidence and records that validate or invalidate the stated figures. The audit trail shall include the source documents that form the basis for assumptions and other information underlying the GHG data.
91. When assessing the audit trail, the DOE shall:
- (a) Address whether there is sufficient evidence available, both in terms of frequency (time period between evidence) and coverage (in covering the full monitoring period);
 - (b) Address the source and nature of the evidence (external or internal, oral or documented);
 - (c) Cross-check the monitoring report against other sources such as comparable information, where available, from sources other than those used in the monitoring report to determine whether the stated figures are correct.
92. The DOE shall only certify GHG emission reductions or net GHG removals that are based on verifiable evidence.

8.1.4. Application of materiality

8.1.4.1. General

93. The concept of materiality is applicable to the verification of monitored GHG emission reductions or net GHG removals achieved by all types of registered A6.4 projects. It is not applicable to:
- (a) Uncertainties related to measurement;
 - (b) Addressing temporary deviations and permanent changes to the registered monitoring plan, the applied methodologies or the applied standardized baselines, regardless of whether corresponding GHG emission reductions or net GHG removals are above or below materiality thresholds.
94. A DOE that plans and conducts verification using the concept of materiality shall achieve a reasonable level of assurance that the reported GHG emission reductions or net GHG removals are free from material errors, omissions or misstatements in accordance with paragraphs 95–105 below.
95. An omission, misstatement, or erroneous reporting of information is material if it might lead, at an aggregated level, to an overestimation of the total GHG emission reductions or net GHG removals achieved by a registered A6.4 project equal to or higher than the following thresholds:
- (a) 0.5 per cent of the emission reductions or removals for projects achieving a total emission reduction or removal equal to or more than 500,000 t CO₂ eq per year;¹¹
 - (b) 1 per cent of the emission reductions or removals for projects achieving a total emission reduction or removal of between 300,000 and 500,000 t CO₂ eq per year;

¹¹ A year refers to a period of 12 consecutive months.

- (c) 2 per cent of the emission reductions or removals for projects achieving a total emission reduction or removal of 300,000 t CO₂ eq per year or less.
96. Recognizing that circumstances may exist that could cause the information reported by activity participants to be materially misstated, the DOE should plan and perform verifications with an attitude of professional scepticism and rely on its professional judgement when applying the concept of materiality.
97. The application of the concept of materiality and reasonable level of assurance implies that some data or information may not be checked. However, the DOE should design its verification and sampling plans to detect all material errors, omissions or misstatements, and any unchecked data or information should not contain any material errors, omissions or misstatements. A DOE's verification opinion applies to 100 per cent of the data and information, even if the DOE may not have checked the entire data set and information.
98. Applying the concept of materiality does not mean that identified errors are not corrected; if an error, omission or misstatement is identified by the DOE, regardless of whether it is material or not, the DOE shall request activity participants to address it.

8.1.4.2. Consideration of materiality in planning verification

99. The DOE should:
- (a) Identify the materiality threshold referred to in paragraph 95 above that corresponds to the amount of GHG emission reductions or net GHG removals that the specific registered A6.4 project will achieve;
 - (b) Understand the environment in which the registered A6.4 project operates, the sources of project emissions within the project boundary and the leakage, the monitoring activities, the equipment used to monitor or measure project data, the origin and application of data used to calculate or measure the emissions, the data flow, the internal quality control system, and the overall organization with respect to monitoring and reporting;¹²
 - (c) Conduct a risk assessment to identify and assess the risks of individual or aggregated material errors, omissions or misstatements that may occur within the threshold based on elements in subparagraphs (a) and (b) above;
 - (d) Design verification plans, audit procedures¹³ and sampling plans whose type, timing¹⁴ and extent are based on and are responsive to the assessed risks of material errors, omissions or misstatements.
100. The materiality thresholds apply to the total GHG emission reductions or net GHG removals actually achieved. When planning verification, the DOE should apply the applicable materiality threshold to the reported total emission reductions or removals. If, as a result of the verification, the initial reported total emission reductions or removals is revised, the DOE should reapply the materiality threshold to the revised total emission

¹² Adapted from European Union. 2007. *Commission Decision of 18 July 2007 establishing guidelines for the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council.*

¹³ In accordance with section 8.1.5.

¹⁴ For example, timing may refer to the specific time intervals for which the DOE may draw its samples.

reductions or removals and, if needed, make adjustments to its verification plans and sampling plans.

8.1.4.3. Consideration of materiality in conducting verification

101. The DOE should:

- (a) Apply verification plans, audit procedures and sampling plans;
- (b) Assess potential errors, omissions and misstatements against the materiality threshold to determine whether they are material individually or in aggregate and whether further audit procedures are needed.

102. If an error, omission or misstatement is detected, the DOE should be aware that it may not be an isolated occurrence and may be a systemic reoccurring error. For example, other errors may exist if the DOE identifies that the error, omission or misstatement arose from a breakdown in the activity participants' internal quality control and quality assurance system.

103. If an immaterial error, omission or misstatement is detected, the DOE shall request the activity participants to address it and should determine whether additional audit procedures should be conducted in order to reach a reasonable level of assurance that the claimed GHG emission reductions or net GHG removals are free from material error, omission or misstatement.

104. If a material error, omission or misstatement is detected, the DOE shall, depending on the circumstances of the error, immediately request the activity participants to address it, or conduct additional audit procedures to confirm or determine the context and magnitude of the error, omission or misstatement and then request the activity participants to address it.

105. If further audit procedures are necessary, the DOE may consider whether the overall verification plans and sampling plans need to be revised.

8.1.5. Standard auditing techniques

106. The DOE shall assess the information provided by the activity participants.

107. In assessing the information, the DOE shall apply the means of verification specified throughout this standard and, where appropriate, standard auditing techniques, including but not limited to:

- (a) Document review, involving:
 - (i) A review of data and information;
 - (ii) A review of the registered monitoring plan, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, paying particular attention to the frequency of measurements, the quality of metering equipment including calibration requirements, and the quality assurance and quality control procedures;
 - (iii) An evaluation of data management and the quality assurance and quality control system in the context of their influence on the generation and reporting of GHG emission reductions or net GHG removals;

- (b) Follow-up actions (e.g. on-site inspection and telephone or e-mail interviews), including:
 - (i) An assessment of the implementation and operation of the registered A6.4 project as per the registered PDD or latest approved revised PDD;
 - (ii) A review of information flows for generating, aggregating and reporting the monitoring parameters;
 - (iii) Interviews with relevant personnel to determine whether the operational and data collection procedures are implemented in accordance with the registered monitoring plan;
 - (iv) Cross checks between the information provided in the monitoring report and data from other sources such as plant logbooks, inventories, purchase records or similar data sources;
 - (v) A check of the monitoring equipment including calibration performance and observations of monitoring practices against the requirements of the registered monitoring plan, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
 - (vi) A review of calculations and assumptions made in determining the GHG data and GHG emission reductions or net GHG removals;
 - (vii) An identification of quality control and quality assurance procedures in place to prevent, or identify and correct, any errors or omissions in the reported monitoring parameters;
 - (c) Sampling approach in accordance with the “Standard for sampling and surveys for Article 6.4 mechanism activities”, including:
 - (i) A random sampling for cases where the activity participants did not apply a sampling approach for monitoring;
 - (ii) An acceptance sampling or another sampling approach for cases where the activity participants applied a sampling approach for monitoring.
108. It is mandatory for the DOE to conduct an on-site inspection at verification for the registered A6.4 project if:
- (a) It is the first verification for the DOE with regard to this project;
 - (b) More than three years have elapsed since the last on-site inspection conducted for verification for the project; or
 - (c) The project has achieved more than 300,000 t CO₂ eq of GHG emission reductions or net GHG removals since the last verification when an on-site inspection was conducted.
109. For cases that are not referred to in paragraph 108 above, it is optional for the DOE to conduct an on-site inspection at verification. If the DOE does not conduct an on-site inspection as a means of verification, it shall describe the alternative means used and justify that they are sufficient for the purpose of verification. If the DOE conducts a remote

inspection as an alternative means to an on-site inspection, the DOE should follow the guidance contained in appendix 1.

110. If any issue related to the project design, including those attributable to the lack of on-site inspection at previous verification, is identified at the verification, the DOE that detected the issue shall rectify it through the post-registration change process in accordance with the “Article 6.4 mechanism activity cycle procedure for projects”.
111. Where no specific means of verification is specified, the DOE should apply the standard auditing techniques described in paragraph 107 above.

8.1.6. Corrective action requests, clarification requests and forward action requests

112. If the DOE identifies issues that require further elaboration, research or expansion in order to determine whether the implementation or the operation of the registered A6.4 project, or the monitoring of GHG emission reductions or net GHG removals meets the relevant Article 6.4 mechanism rules and requirements, the DOE shall ensure that these issues are accurately identified, formulated, discussed and concluded in the verification and certification report.
113. The DOE shall raise a CAR if one of the following situations occurs:
- (a) Non-compliance with the registered monitoring plan, the applied methodologies, the applied standardized baselines or the other applied methodological regulatory documents is found in monitoring and reporting, and has not been sufficiently documented by the activity participants, or if the evidence provided to prove conformity is insufficient;
 - (b) Modifications to the implementation or operation of the registered A6.4 project, or the monitoring or GHG emission reductions or net GHG removals, has not been sufficiently documented by the activity participants;
 - (c) Mistakes have been made by the activity participants in applying assumptions, data or calculations of GHG emission reductions or net GHG removals that will impact the quantity of emission reductions or removals;
 - (d) Issues identified in a FAR during the validation or the previous verification(s) have not been resolved by the activity participants.
114. The DOE shall raise a CL if the information provided by the activity participants is insufficient or not clear enough to determine whether the applicable Article 6.4 mechanism rules and requirements have been met.
115. The DOE shall raise a FAR if issues related to monitoring and reporting that require attention and/or adjustment at the next verification are identified.
116. The DOE shall resolve or “close out” CARs and CLs only if the activity participants rectify the monitoring report, or provide additional explanations or evidence that satisfy the DOE’s concerns. If this is not done, the DOE shall not submit a request for issuance of A6.4ERs.
117. The DOE shall report on all CARs, CLs and FARs in its verification and certification report. This reporting shall explain the issues raised, the responses provided by the activity participants, the means of verification of such responses and references to any resulting changes in the monitoring report or its supporting documents.

8.2. Verification of compliance with specific requirements for issuance

8.2.1. General

118. The DOE shall determine, by following the general verification requirements referred to in sections 5 and 8.1 above, whether the monitoring complies with all relevant requirements for monitoring as contained in the “Article 6.4 mechanism activity standard for projects”, including the requirements on:

- (a) General requirements, including on:
 - (i) Implementation and operation of the project as per the description in the registered PDD;
 - (ii) Continuous monitoring;
 - (iii) Coverage of the monitoring period;
 - (iv) Presentation of monitoring results by year of occurrence of GHG emission reductions or net GHG removals;
 - (v) Preparation of monitoring reports in chronological order and separation by crediting periods;
 - (vi) Application of appropriate GWPs;
 - (vii) Maintenance of monitoring results;
- (b) Avoidance of double issuance;
- (c) Description of implemented registered project;
- (d) Description of monitoring system;
- (e) Provision of data and parameters used;
- (f) Calculation of GHG emission reductions or net GHG removals.

119. When verifying the compliance of the implementation and the operation of the registered A6.4 project and monitoring of GHG emission reductions or net GHG removals with the requirements for implementation, operation and monitoring referred to in paragraph 118 above, the DOE shall additionally follow the specific guidance on validation regarding some of these requirements provided in sections 8.2.2–8.2.9 below.

8.2.2. Avoidance of double issuance

120. The DOE shall determine whether the A6.4 project is also registered, or covered by a programme, under any other international, regional, national, or subnational GHG mitigation crediting scheme prior to the request for issuance based on the confirmation from any other crediting scheme, if applicable, public information and any other information obtained from the activity participants.

121. If the DOE determines that the A6.4 project is registered, or covered by a programme, under other crediting scheme, the DOE shall additionally determine whether the activity participants have obtained a confirmation from the other crediting scheme that the same

GHG emission reductions or net GHG removals being requested for issuance of A6.4ERs have not been or will not be credited under the other crediting scheme.

8.2.3. Project implementation and operation

122. The DOE shall identify any concerns related to the conformity of the implemented A6.4 project and its operation with the registered PDD and determine whether:

- (a) The project has been implemented and is operating in accordance with the description contained in the registered PDD; or
- (b) Any deviation or the proposed or actual changes in the implementation or operation of the project comply with the relevant requirements in the “Article 6.4 mechanism activity standard for projects”.

123. By means of an on-site inspection or other means of verification in accordance with – 108 or 109 above, the DOE shall assess that all physical features (technology, project equipment, and monitoring and metering equipment) of the registered A6.4 project specified in the registered PDD are in place and that the activity participants are operating the project as per the registered PDD or latest approved revised PDD.

124. For each monitoring period, the DOE shall report:

- (a) The implementation status of the registered A6.4 project. For a project that consists of more than one site, the DOE shall describe the status of implementation and the starting date of operation for each site. For a project with phased implementation, the DOE shall state the progress of the project achieved in each phase under verification. If the phased implementation is delayed, the DOE shall describe the reasons and present the expected implementation dates;
- (b) The actual operation of the registered A6.4 project;
- (c) The information (data and variables) provided in the monitoring report that is different from that stated in the registered PDD or any latest approved revised PDD, and has caused an increase in the estimates of GHG emission reductions or net GHG removals in the current monitoring period or is highly likely to increase the estimates in the future monitoring periods;¹⁵
- (d) An opinion on the cause of any increase in the actual GHG emission reductions or net GHG removals achieved by the registered A6.4 project in the current monitoring period that was reported in monitoring report.

8.2.4. Monitoring plan

125. The DOE shall determine whether the registered monitoring plan is in accordance with the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents based on the actual implementation of the project.

126. For monitoring aspects that are not specified in the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents, the

¹⁵ Discrepancies may include higher water availability than expected in the PDD, which may increase the electricity output from a hydropower plant, or a higher plant load factor owing to higher bagasse availability during the crushing season, which increases the production of steam and electricity.

DOE should highlight issues which may enhance the level of accuracy and completeness of the registered monitoring plan.

8.2.5. Monitoring activities

127. The DOE shall determine whether:

- (a) The registered monitoring plan has been properly implemented and followed by the activity participants;
- (b) All parameters stated in the registered monitoring plan have been monitored and updated as applicable;
- (c) The equipment used for monitoring is controlled and calibrated in accordance with the registered monitoring plan, the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents, local/national standards, or as per the manufacturer's specification;
- (d) Monitoring results are consistently recorded as per the approved frequency;
- (e) Quality assurance and quality control procedures have been applied in accordance with the registered monitoring plan.

128. If the activity participants applied a sampling approach to determining data and parameters monitored, the DOE shall assess the compliance of the sampling efforts and surveys with the validated sampling plan in accordance with the "Standard: Sampling and surveys for CDM project activities and programme of activities".

129. The DOE shall list each parameter required by the registered monitoring plan and state how it verified the information flow (from data generation, aggregation, to recording, calculation and reporting) for these parameters including the values in the monitoring report.

8.2.6. Calibration frequency for measuring instruments

130. The DOE shall determine whether the calibration of the measuring equipment that has an impact on the claimed GHG emission reductions or net GHG removals is conducted by the activity participants at the frequency specified in the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents or the registered monitoring plan.

131. If, during the verification for a certain monitoring period, the DOE identifies that the calibration has been delayed and the calibration has been implemented after the monitoring period in consideration (i.e. the results of delayed calibration are available), referring to the illustrative examples in appendix 2, the DOE may conclude its verification, provided the following conservative approach is adopted in the calculation of GHG emission reductions or net GHG removals:

- (a) Applying the maximum permissible error¹⁶ of the instrument to the measured values taken during the period between the scheduled date of calibration and the actual date of calibration, if the results of the delayed calibration do not show any

¹⁶ The maximum permissible errors of all the measuring instruments are specified by the respective manufacturers as part of their technical specifications.

- errors in the measuring equipment, or if the error is smaller than the maximum permissible error; or
- (b) Applying the error identified in the delayed calibration test, if the error is beyond the maximum permissible error of the measuring equipment.
132. The DOE shall confirm that the error has been applied:
- (a) In a conservative manner, such that the adjusted measured values of the delayed calibration shall result in fewer claimed GHG emission reductions or net GHG removals;
- (b) For all measured values taken during the period between the scheduled date of calibration and the actual date of calibration.
133. If the results of the delayed calibration are not available, or the calibration has not been conducted at the time of the verification, the DOE, prior to finalizing the verification, shall request the activity participants to conduct the required calibration and shall determine whether the activity participants have calculated GHG emission reductions or net GHG removals conservatively using the approach mentioned in paragraph 131 above.
134. If the DOE determines that it is not possible for the activity participants to conduct the calibration at the frequency specified in the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents, or the registered monitoring plan due to reasons beyond the control of the activity participants,¹⁷ the DOE shall follow the applicable requirements related to post-registration changes in section 7 above.
135. If neither the applied methodologies, the applied standardized baselines, the other applied methodological regulatory documents, nor the registered monitoring plan specify any requirements for calibration frequency for the measuring equipment, the DOE shall determine whether the equipment is calibrated either in accordance with the specifications of the local/national standards, or as per the manufacturer's specification. If neither local/national standards nor the manufacturer's specification are available, the DOE shall determine whether the equipment is calibrated in accordance with the specifications of the international standards.

8.2.7. Data and calculation of emission reductions or net removals

136. The DOE shall assess the data and calculations of GHG emission reductions or net GHG removals achieved by the registered A6.4 project and determine whether:
- (a) A complete set of data for the specified monitoring period is available. If only partial data are available because activity levels or non-activity parameters have not been monitored in accordance with the registered monitoring plan, the DOE shall assess whether:
- (i) The most conservative values approach is applied to the parameters for the entire non-monitoring period in accordance with the provisions relating to temporary deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines in the "Article 6.4 mechanism activity standard for projects"; or

¹⁷ For example, due to the contractual terms between the activity participant and purchasing/selling entities.

- (ii) Alternative monitoring arrangements for the non-monitoring period are described, whether they apply conservative assumptions or discount factors to the calculations, and whether the alternative monitoring arrangements have been approved by the Supervisory Body under the prior-approval track or to be approved by the Supervisory Body under the issuance track in accordance with the provisions relating to temporary deviation from the registered monitoring plan, the applied methodologies or the applied standardized baselines in the “Article 6.4 mechanism activity standard for projects” and the “Article 6.4 mechanism activity cycle procedure for projects”;
- (b) The information provided in the monitoring report has been cross-checked with other sources such as plant logbooks, inventories, purchase records and laboratory analysis;
- (c) The calculations of baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals, and leakage GHG emissions have been carried out in accordance with the formulae and methods described in the registered monitoring plan, the applied methodologies, the applied standardized baselines and the other applied methodological regulatory documents;
- (d) Any assumptions used in emission or removal calculations have been justified;
- (e) Appropriate emission factors, IPCC default values, GWPs and other reference values have been correctly applied;
- (f) [If the project applies an approved standardized baseline that standardizes baseline emissions, the standardized values of the parameters have been applied using the correct version of the applied standardized baseline in accordance with the “Article 6.4 mechanism activity standard for projects”.]

137. The DOE shall provide:

- (a) An indication of whether a complete set of data for the monitoring period was not available because activity levels or non-activity parameters were not monitored in accordance with the registered monitoring plan, and if so, whether the most conservative values approach was applied or alternative monitoring arrangements were proposed or have been approved by the Supervisory Body;
- (b) A description of how the DOE cross-checked reported data;
- (c) A confirmation that appropriate methods and formulae for calculating baseline GHG emissions or baseline net GHG removals, project GHG emissions or actual net GHG removals and leakage GHG emissions have been followed;
- (d) An opinion on whether assumptions, emission factors and default values that were applied in the calculations have been justified.

8.2.8. Environmental impacts, social impacts and sustainable development co-benefits

138. The DOE shall determine whether:

- (a) The monitoring of environmental impacts, social impacts and sustainable development co-benefits has been carried out in accordance with the monitoring

plan of these impacts and co-benefits of the A6.4 project prepared in accordance with the “Article 6.4 mechanism sustainable development tool”;

- (b) The reported monitoring results correspond to these impacts and co-benefits of the project as observed by the DOE.

8.2.9. Continuous stakeholder engagement

- 139. The DOE shall determine whether relevant comments on the A6.4 project have been submitted from Parties, stakeholders or UNFCCC-admitted observer organizations after its registration through the process of continuous engagement of stakeholders in accordance with the “Article 6.4 mechanism activity cycle procedure for projects”, and if so, determine whether the activity participants have taken into account the comments in their actions in the Article 6.4 mechanism activity cycle, as appropriate.

8.3. Verification and certification report

- 140. The DOE shall report the results of its assessment in the verification and certification report, including the following:
 - (a) An executive summary of the verification process and its conclusions;
 - (b) Details of the verification team, technical experts, internal reviewers involved, together with their roles in the verification activity and, where conducted in accordance with paragraph 108 or 109 above, details of who conducted the on-site inspection;
 - (c) A list of interviewees, documents reviewed, sampling approaches used by the DOE and, where conducted in accordance with paragraph 108 or 109 above, outline of the on-site inspection. If the DOE applied a sampling approach to the on-site inspection, the DOE shall include a description of how the sample size was determined and how the field check was carried out;
 - (d) Results of the dialogue between the DOE and the activity participants, as well as any adjustments made to the monitoring report following the continuous engagement of stakeholders;
 - (e) The applied approach, finding and conclusion in the assessment of compliance with each requirement for issuance conducted in accordance with sections 8.1–8.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them;
 - (f) A list of each parameter specified by the registered monitoring plan and a statement on how the values in the monitoring report have been verified;
 - (g) A statement on whether any post-registration changes to the registered PDD have been approved by the Supervisory Body or will be submitted together with the request for issuance of A6.4ERs;
 - (h) An assessment of remaining issues from the previous verification period, if appropriate;
 - (i) Information on quality control within the team and in the verification process;

- (j) A verification opinion, providing:
 - (i) A summary of the verification method and the process used and the verification criteria applied;
 - (ii) A conclusion on the verified amount of GHG emission reductions or net GHG removals achieved.
141. Where the DOE applied the concept of materiality in planning and conducting verification for the registered A6.4 project in accordance with section 8.1.4 above, it shall report:
- (a) The risks, the risk assessment undertaken and how the verification plans and sampling plans were designed to respond to these risks and ensure that all material errors, omissions or misstatements were detected;
 - (b) Whether and how the verification plans and sampling plans were revised to take into account the need for further audit procedures due to the nature/type of errors, omissions or misstatements detected;
 - (c) How the concept of materiality was applied in determining whether a detected error, omission or misstatement was material or immaterial either individually or in aggregate.
142. The DOE shall describe all documentation supporting the verification and make it available on request.
143. The DOE shall, based on its verification, certify in writing, that the registered A6.4 project achieved the verified amount of GHG emission reductions or net anthropogenic GHG removals during the specified monitoring period that would not have occurred in the absence of the project.¹⁸
144. The DOE shall notify the activity participants of the verification outcome, containing:
- (a) A positive verification opinion with verified amount of GHG emission reductions or net GHG removals, and the date of submission of the verification and certification report as part of the request for issuance of A6.4ERs to the secretariat; or
 - (b) A negative verification opinion, including the reasons for the monitoring results, as documented, having been determined as not complying with the relevant requirements for issuance.

9. Validation for renewal of crediting period

9.1. General requirements

9.1.1. Overarching requirement

145. The DOE shall determine whether the activity participants have updated the PDD in accordance with the relevant requirements for renewal of the crediting period in the “Article 6.4 mechanism activity standard for projects”.

¹⁸ The certification report constitutes a request to the Supervisory Body for issuance of A6.4ERs equal to the verified amount of GHG emission reductions or net GHG removals.

9.1.2. Other requirement

146. If the activity participants used a later valid version of the PDD form for the updated PDD than the version of the form of the registered PDD, the DOE shall determine whether the information transferred to the later valid version of the PDD form is materially the same as that in the registered PDD.

9.2. Validation of compliance with specific requirements for renewal

9.2.1. General

147. The DOE shall determine, by following the general validation requirements referred to in sections 5 and 6.1 above mutatis mutandis and section 9.1 above, whether the proposed renewal of the crediting period of a registered A6.4 project complies with all relevant requirements for renewal contained in the “Article 6.4 mechanism activity standard for projects”, including the requirements on:

- (a) Application of valid version of the methodologies and methodological tools;
- (b) [Application of an approved standardized baseline;]
- (c) Validity of the original baseline or its update;
- (d) Update of MoC statement;
- (e) Combination of post-registration change at renewal, if applicable.

9.2.2. Application of valid version of the methodologies and methodological tools

148. If the activity participants selected another methodology, methodological tool and/or standardized baseline for the purpose of renewal of the crediting period of the registered A6.4 project due to the inapplicability of the valid version of the methodology (including a consolidated methodology thereof), methodological tool and/or standardized baseline applied to the registered PDD, the DOE shall assess whether the updated PDD complies with all the requirements of the selected methodology, methodological tool and/or standardized baseline.

149. If the activity participants deviated from the valid version of the methodology (including a consolidated methodology thereof) and/or methodological tool applied in the registered PDD, or from any other selected methodology and/or methodological tool for the purpose of renewal of the crediting period of the registered A6.4 project, paragraphs 39–40 above shall apply mutatis mutandis.

9.2.3. Validity of original baseline or its update

150. The DOE shall assess the validity of the original baseline or its update through an assessment of the following issues:
- (a) [The impact of the latest nationally determined contribution of the host Party if available or different from the one taken into account when establishing the original baseline, new relevant national and/or sectoral policies, regulations and circumstances on the baseline, taking into account the “Article 6.4 mechanism activity standard for projects” and any other relevant guidance from the Supervisory Body with regard to renewal of the crediting period of a registered A6.4 project, at the time of requesting renewal of the crediting period of the project;]

- (b) The correctness of the application of the approved methodologies and, where applicable, the approved standardized baselines and the other methodological regulatory documents for the determination of the continued validity of the baseline or its update, and the estimation of GHG emission reductions or net GHG removals for the applicable crediting period of the registered A6.4 project.

151. [The requirement contained in paragraph 150(a) above shall not apply to a registered A6.4 project applying the valid version of an applicable approved standardized baseline that standardizes the baseline scenario.]

9.2.4. Update of modalities of communication statement

152. The DOE shall confirm that the names of the activity participants included in the updated PDD are consistent with the names of the activity participants in the latest version of the MoC statement.

9.2.5. Combination of post-registration change at renewal

153. If the activity participants requested approval of post-registration changes together with the request for renewal of the crediting period of the registered A6.4 project, the DOE shall also validate the post-registration changes in accordance with the relevant requirements in section 7 above and the “Article 6.4 mechanism activity cycle procedure for projects”, and shall submit a request for approval of post-registration changes together with the request for renewal of the crediting period of the project in accordance with the relevant requirements in the “Article 6.4 mechanism activity cycle procedure for projects”.

9.3. Validation report

154. In its validation report for renewal of the crediting period, the DOE shall:

- (a) Report on all items listed in paragraph 63 above except for paragraph 63(e) above;
- (b) Provide all its applied approaches, findings and conclusions on the assessment of:
 - (i) Whether the revised PDD is prepared using the valid version of the applicable form and following the instructions therein, as applicable;
 - (ii) The compliance of the updated project design with the requirements for renewal of the crediting period conducted in accordance with sections 9.1–9.2 above, including the CARs, CLs or FARs issued to the activity participants and how they have been addressed by them;
- (c) State whether there are any proposed post-registration changes effective from the start date of the next crediting period in the request for renewal of the crediting period of the project, if the validation is primary for the latter.

Appendix 1. Guidance on remote inspection as an alternative means to an on-site inspection

1. In this document, a remote inspection for the purpose of validation or verification refers to the activities where the validation or verification team of the designated operational entity (DOE) carries out the same activities as in a physical on-site inspection through information and communication technologies (ICT) tools.
2. There are risks posed by remote inspections, including in the use of ICT tools. In order to ensure a level of assurance of the validation or verification as comparable as in an on-site inspection, there needs to be measures in place to reduce these risks.
3. The DOE should identify risks pertaining to the remote inspection for each validation or verification activity and establish and implement measures to eliminate or reduce those risks. A DOE should also integrate this risk assessment process into its quality management systems.
4. The DOE should implement the following actions at different stages of a validation or verification activity:
 - (a) Risk assessment stage: The feasibility of conducting a remote inspection depends on the risk level and whether measures to eliminate or reduce the risks are adequate for the validation or verification. Therefore, a risk assessment to be conducted by the DOE should cover the aspects below:
 - (i) Identifying and assessing the risks inherent in a remote inspection. The risks may be at different levels and could cover different aspects; hence the risk identification and assessment should cover:
 - a. Risks related to organizational and procedural aspects, which include generic risks. These risks could relate to the following: the quality of the internet connection; the quality of ICT tools such as good camerawork to ensure a reasonably good view for the validation or verification team; the amount of documentation to be reviewed remotely; whether relevant data flows can be accessed remotely; what record-keeping system is established; the maintaining of confidentiality and personnel data protection; and the required competence and resources of the validation or verification team;
 - b. Risks related to the project and its configuration, which present project-specific risks: The risks could relate to the following: whether the boundary and features of the project can be evaluated remotely; whether the remote inspection would enable the DOE to observe any sources of emissions that are not included in the project; how control activities are carried out; and how calculations are tracked and cross-checked;
 - c. Risks related to monitoring aspects: The risks could relate to the following: the complexity of the monitoring parameters and the monitoring plan; data processing and reporting; whether a fiscal metering method is applied; the sampling or surveys conducted at

household level; what status of the monitoring period is being verified; and whether data and information have been thoroughly checked during previous verifications or whether such data and information can be checked subsequently without an on-site inspection;

- (ii) Establishing measures to eliminate or reduce the identified risks. The DOE should establish measures to eliminate or reduce each identified risk at different levels described in subparagraph (i) above;
 - (iii) The risk assessment pertaining to the remote inspection may be done in the context of the application of materiality following the relevant provisions in this standard;
- (b) Planning stage: Based on risk assessment outcomes, the DOE should plan the validation or verification activity as follows:
- (i) Composing a validation or verification team with sufficient members that have the knowledge, skill and solid professional judgement required in an on-site inspection in conjunction with additional competence in applying ICT tools;
 - (ii) Conducting a desk review to gain a prior understanding of records and documentation control processes of the project participants;
 - (iii) Establishing a validation or verification plan to clearly define the tasks to be done during the remote inspection, taking into account the established measures to eliminate or reduce the identified risks. This includes a detailed allocation of responsibilities by different validation or verification team members with the required knowledge and specific time zones to ensure the team members audit separately and make the best use of time;
 - (iv) Determining ICT tools to be used with the activity participants and conducting a test on the agreed ICT tools before the remote inspection to ensure that there is a stable connection and understanding of how to use such ICT tools. The DOE should also ensure that there is a backup plan in case there is a connection issue;
- (c) Implementation stage: During the remote inspection, the DOE should implement measures it has established to mitigate the identified risks, while conducting the validation or verification following the relevant requirements of this standard. At this stage, the DOE may decide to extend or terminate the remote inspection if it finds during the remote inspection that the actual risks are higher than initially assessed.
- (d) Post-remote inspection stage: the DOE should:
- (i) Assess whether another round of remote inspection is needed while reviewing the activity participants' response to clarification requests, corrective action requests and/or forward action requests;
 - (ii) Ensure that its technical review process is able to identify any risks that were not identified during risk assessment stage.

Appendix 2. Calibration

1. The following provides an illustrative example for applying the provisions in paragraph 131(a) and (b) of this standard.
2. An electricity energy meter with a maximum permissible error ($\pm 5\%$), which may be used for measuring the electricity export for baseline emissions and electricity import for project emission calculations, is required to be calibrated every year. If the calibration is delayed and instead of after one year it is conducted after one and a half years, and the result of the delayed calibration is available at the time of verification, to account for the delayed calibration the measured values shall be corrected as demonstrated in the following Table 1 and Table 2 for situations stipulated in paragraph 131(a) and (b) of this standard.

Table 1. Sample calculation for the cases where the error identified in the delayed calibration is smaller than the maximum permissible error

Measured value	Parameter	Error identified during delayed calibration	Corrected values
100 MWh	Electricity export	$\pm 2\%$	$100 (1 - \text{max. permissible error}/100) = 95 \text{ MWh}$
100 MWh	Electricity import	$\pm 2\%$	$100 (1 + \text{max. permissible error}/100) = 105 \text{ MWh}$

Table 2. Sample calculation for the cases where the error identified in the delayed calibration is larger than the maximum permissible error

Measured value	Parameter	Error identified during delayed calibration	Corrected values
100 MWh	Electricity export	$\pm 7\%$	$100 (1 - \text{error}/100) = 93 \text{ MWh}$
100 MWh	Electricity import	$\pm 7\%$	$100 (1 + \text{error}/100) = 107 \text{ MWh}$

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