

**A6.4-SB008-AA-A13**

## Concept note

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# Availability of Article 6.4 mechanism designated operational entities

Version 02.0



**United Nations**  
Framework Convention on  
Climate Change

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## 1. Procedural background

1. Paragraph 5(e) of decision 3/CMA.3, adopted by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), at its third session, requested the Supervisory Body of the mechanism established by Article 6, paragraph 4, of the Paris Agreement (Article 6.4 mechanism) to expeditiously accredit operational entities as designated operational entities (DOEs).<sup>1</sup>
2. At its fifth meeting (SB 005), the Supervisory Body considered the concept note titled “Development of Article 6.4 mechanism accreditation standards and procedures” (version 02.0),<sup>2</sup> and requested that the secretariat develop a concept note on temporary solutions to address the lack of DOEs for the Article 6.4 mechanism for consideration by the Supervisory Body at SB 006, taking into account the following feedback:
  - (a) Further elaborate options to increase clarity on how to operationalize the proposed options in the concept note “Development of Article 6.4 mechanism accreditation standards and procedures” (version 02.0);
  - (b) Provide pros and cons of and justification for the proposed options.
3. The Supervisory Body at SB 006 considered the concept note titled “Availability of Article 6.4 mechanism designated operational entities (version 01.0)”,<sup>3</sup> and requested the secretariat to conduct further analysis and propose suitable measures specific to ensure availability of Article 6.4 mechanism DOEs for verification of requests for issuance from transitioned activities as priority in the next iteration of the concept note to be considered by the Supervisory Body at its eight meeting.

## 2. Purpose

4. This concept note is intended to further elaborate suitable measures specific to ensure availability of A6.4 mechanism DOEs for verification of request for issuance from transitioned activities to address the lack of availability of DOEs during the operationalization of the Article 6.4 mechanism activity cycle.

## 3. Key issues and proposed solutions

### 3.1. Overview of the accreditation status of clean development mechanism designated operational entities and applicant entities under the current accreditation term

5. A clean development mechanism (CDM) applicant entity (AE) is an entity that has applied for accreditation by the CDM Executive Board (hereinafter referred to as the Board) and designation by the Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol (CMP) as a DOE. A CDM DOE is an entity designated by the CMP, based

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<sup>1</sup> Decision 3/CMA.3, paragraph 5(e), as contained in document FCCC/PA/CMA/2021/10/Add.1 available at: [https://unfccc.int/sites/default/files/resource/cma2021\\_10\\_add1\\_adv.pdf#page=25](https://unfccc.int/sites/default/files/resource/cma2021_10_add1_adv.pdf#page=25).

<sup>2</sup> As contained in document A6.4-SB005-AA-05 available at: [https://unfccc.int/sites/default/files/resource/a64-sb005-aa-a04\\_.pdf](https://unfccc.int/sites/default/files/resource/a64-sb005-aa-a04_.pdf).

<sup>3</sup> As contained in document A6.4-SB006-AA-10 available at: <https://unfccc.int/sites/default/files/resource/a64-sb006-aa-a10.pdf>.

on a recommendation by the Board, as being qualified to validate proposed CDM project activities and programmes of activities, as well as to verify and certify reported greenhouse gas (GHG) emission reductions and net anthropogenic GHG removals by sinks.

6. There are 28 CDM DOEs currently in different accreditation stages within their five-year accreditation term, and five CDM AEs currently in the application stage of the initial accreditation assessment.<sup>4</sup> Details on the 28 CDM DOEs and four CDM AEs, along with their current accreditation statuses, are provided for in appendix 1.

### **3.2. Key issue**

7. The Supervisory Body's workplan aims to operationalize the Article 6.4 mechanism activity cycle process and the process of transitioning CDM activities to the Article 6.4 mechanism effectively by 1 January 2024. In both cases, the validation and/or verification/certification roles of the Article 6.4 mechanism DOEs are crucial. Given the current absence of Article 6.4 mechanism DOEs and the time required to accredit entities in accordance with the yet-to-be-developed and approved Article 6.4 mechanism accreditation standard and procedure, it is essential to find a temporary solution to ensure the availability of a reasonable number of Article 6.4 mechanism DOEs when the Article 6.4 mechanism activity cycle becomes operational.
8. Although Article 6.4 mechanism methodological requirements including removals as well as the sustainable development tool for the Article 6.4 mechanism are still in the development phase, the Supervisory Body could decide that CDM DOEs conduct verification of requests for issuance from transitioned activities within the scope of paragraph 17 of the Procedure for the transition of CDM activities to the Article 6.4 mechanism (version 01.0) to be read in conjunction with the paragraphs 20, 29 and 30 of the Standard for the transition of CDM activities to the Article 6.4 mechanism (version 01.0).<sup>5, 6</sup>

### **3.3. Temporary solutions to address the availability of Article 6.4 mechanism designated operational entities**

9. Considering that the role and competence required for the Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities as specified in paragraph 17 of the Procedure for the transition of CDM activities to the Article 6.4 mechanism (version 01.0) are expected to be similar to those of CDM DOEs, two out of three options proposed earlier (i.e. Option 1 and Option 2) in the concept note titled "Availability of Article 6.4 mechanism designated operational entities" (version 01.0)<sup>7</sup> can be considered with modifications to address the urgent need for Article 6.4 mechanism

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<sup>4</sup> Among the 28 CDM DOEs, the expiration dates of the current CDM accreditation term are before January 2024 (3 DOEs), May 2024 and April 2025 (10 DOEs) and March 2027 and November 2028 (15 DOEs). Out of the five CDM AEs, three CDM AEs are in the initial accreditation assessment stage (i.e., on-site assessment conducted) and two CDM AE are in the application stage.

<sup>5</sup> <https://unfccc.int/sites/default/files/resource/a64-sb006-a02.pdf>.

<sup>6</sup> <https://unfccc.int/sites/default/files/resource/a64-sb006-a01.pdf>.

<sup>7</sup> <https://unfccc.int/sites/default/files/resource/a64-sb006-aa-a10.pdf>.

DOEs in time to conduct verification of requests for issuance from transitioned activities as follows:<sup>8</sup>

- (a) **Option 1:** Allow CDM DOEs to serve as Article 6.4 mechanism DOEs without requiring any additional accreditation assessment. These DOEs would be authorized to perform verification/certification activities of requests for issuance from transitioned activities under the Article 6.4 mechanism. However, once the Article 6.4 mechanism accreditation process is operational, these DOEs will be subject to accreditation assessments under the Article 6.4 accreditation process, beginning with an initial accreditation assessment, if they intend to continue their involvement in Article 6.4 mechanism activities;
  - (b) **Option 2:** Allow CDM DOEs to serve as Article 6.4 mechanism DOEs to perform verification/certification activities of requests for issuance from transitioned activities, upon successfully completing a simplified accreditation assessment (e.g., a desk review focusing on the distinctions between CDM and Article 6.4 accreditation standards). Subsequently, when the Article 6.4 accreditation process is operational, these DOEs will undergo accreditation assessments under the Article 6.4 accreditation process, beginning with an initial accreditation assessment if they intend to continue their involvement in Article 6.4 mechanism activities.
10. Appendix 2 further elaborates on these two options, to enhance clarity regarding the implementation of each option, including an analysis of the advantages, disadvantages, and justifications for each option. The major difference between Option 1 and Option 2 is that Option 2 requires conduct of a simplified accreditation assessment based on Article 6.4 mechanism accreditation requirements before allowing DOEs to serve as Article 6.4 mechanism DOEs to perform verification/certification activities of requests for issuance from transitioned activities, whereas Option 1 does not require conduct of such simplified assessment. It is to be noted that, although there is no perceived additional competence required for these CDM DOEs to perform verification/certification activities of requests for issuance from transitioned activities, the simplified assessment required in Option 2 is primarily to ensure that CDM DOEs' quality management systems have been extended based on the Article 6.4 mechanism accreditation requirements.
11. The figure below illustrates the possible scenarios for the proposed options in relation to the estimated timeline of key steps. In the figure, the notations D1, D2, and D3 represent the anticipated dates for the operationalization of the Article 6.4 mechanism activity cycle, adoption of the Article 6.4 mechanism accreditation standard and procedure by the

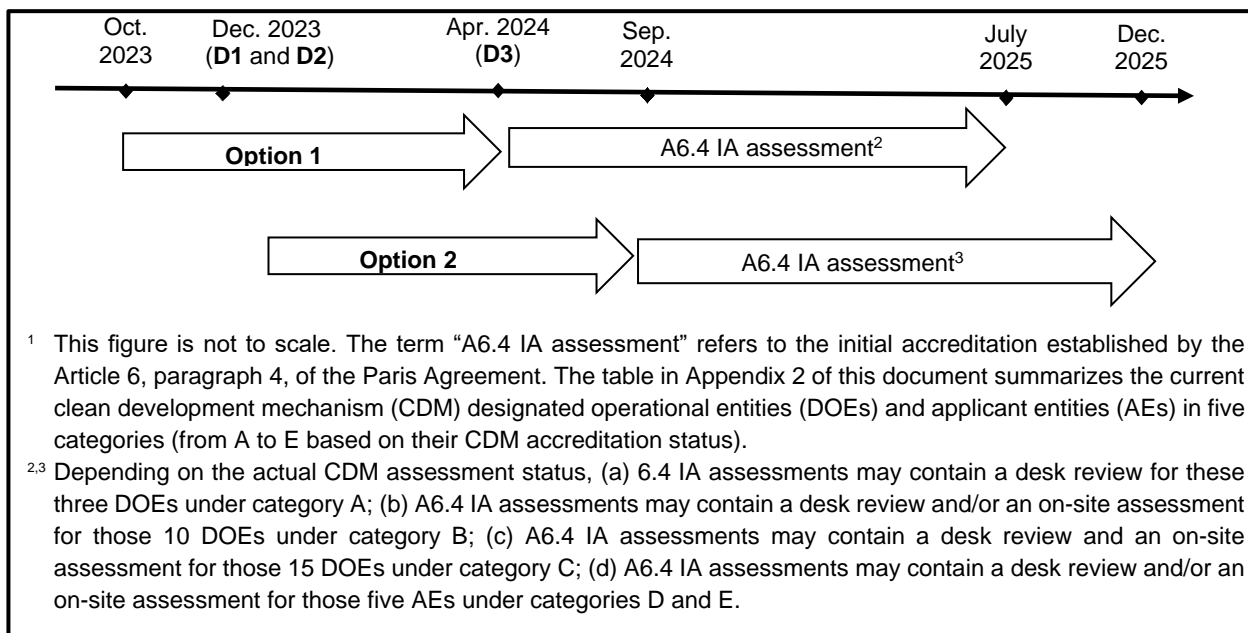
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<sup>8</sup> Although these two options (i.e. Option 1 and Option 2) proposed earlier were based on the scope of conducting validation and/or verification/certification activities under the Article 6.4 mechanism, whereas the scope of this concept note is limited to conducting verification of request for issuance from transitioned activities, these two options proposed earlier still can be considered. Since the related scope is reduced, corresponding modifications are introduced to ensure the application of these two options proposed earlier as per the reduced scope. Further, the advantages and disadvantages resulting from these options proposed earlier are updated accordingly while they are being applied in this concept note. Option 3 proposed earlier is removed from this concept note, since this option does not fit the purpose of this concept note, which is limited to conduct verification of request for issuance from transitioned activities, and since this option is a long-term option in which Article 6.4 mechanism initial accreditation would start only by March 2026 (it is expected that by this period, the Article 6.4 mechanism accreditation process would become fully operational).

Supervisory Body, and the commencement of the Article 6.4 mechanism accreditation process, respectively.<sup>9</sup> Based on the figure, it can be concluded that:

- (a) Option 1 can be implemented just before the operationalization of the Article 6.4 mechanism activity cycle (i.e., D1). The initial accreditation assessments for the Article 6.4 mechanism are planned to take place within 15 months after the Article 6.4 mechanism accreditation process becomes operational (i.e., D3);
- (b) Option 2 can be implemented only after the adoption of the Article 6.4 mechanism accreditation standard and procedure by the Supervisory Body (i.e., D2). The initial accreditation assessments for the Article 6.4 mechanism are planned to be conducted within 15 months after September 2024 (i.e., end of the period conducting simplified desk review).

**Figure. Possible scenarios on the proposed options against timeline<sup>1</sup>**



12. The Table below summarizes the anticipated numbers of CDM DOEs which could serve and be accredited as Article 6.4 mechanism DOEs to perform verification/certification activities of requests for issuance from transitioned activities as per different milestones within the three proposed options.<sup>10</sup>

<sup>9</sup> As per concept note “Development of Article 6.4 mechanism accreditation standards and procedures” (A6.4-SB005-AA-A04), paragraph 6, revisions of the accreditation related documents other than the Article 6.4 mechanism accreditation standard and procedure will be prepared once the Supervisory Body adopts the Article 6.4 mechanism accreditation standard and procedure; therefore, the possible operationalization date of the Article 6.4 accreditation process would be in April 2024.

<sup>10</sup> It is assumed that all five CDM AEs are accredited as CDM DOEs.

**Table 1. Anticipated numbers of CDM DOEs allowed to serve and to be accredited as Article 6.4 mechanism DOEs**

No. of CDM DOEs allowed to serve as Article 6.4 mechanism DOEs			No. of CDM DOEs accredited as Article 6.4 mechanism DOEs	
Option no.	Jan. 2024	Sep. 2024	July. 2025	Dec. 2025
1	33	33	33	33
2	0	33	22	33

**3.4. Proposed transition plans for each option**

13. Given the similarities in the roles of DOEs under the CDM and the Article 6.4 mechanism, two options have been proposed in paragraph 9 above to address the absence of Article 6.4 mechanism DOEs that conduct verification of requests for issuance from transitioned activities. Appendix 2 further outlines the transition plan based on each option with the aim to ensure their availability and facilitate progress within the Article 6.4 mechanism activity cycle. Table 2 below summarizes the proposed transition plan.

**Table 2. Proposed transition plan**

<b>Proposed timelines allowing CDM DOEs to serve as Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities</b>							
<b>Option no.</b>	Confirmation by CDM DOEs to act as 6.4 DOEs	Preparing a list of Article 6.4 mechanism quality management system (QMS) related documents that a DOE needs to submit for its simplified desk review	Article 6.4 mechanism QMS established by DOEs and submission of related documents <sup>11</sup>	Simplified desk review process preparedness and conducting accreditation roster of experts training	Presenting outcomes on which CDM DOEs that confirm to act Article 6.4 DOE	Conducting simplified desk review	Period allowing CDM DOEs to conduct verification of requests for issuance from transitioned activities
<b>1</b>	6 – 30 November 2023	Not applicable (NA)	NA	NA	First Supervisory Body meeting in 2024	NA	Until the Article 6.4 mechanism DOEs become available
<b>2</b>		15 – 30 November 2023	1 – 31 December 2023	15 – 31 December 2023	NA	1 January – 30 September 2024	

<sup>11</sup> With the assumption that the Article 6.4 mechanism accreditation standard and procedure are to be approved by the Supervisory Body at SB008.



## **4. Impacts**

14. The proposal above provides information for the Supervisory Body to consider regarding the options for addressing the availability of Article 6.4 mechanism DOEs that conduct verification of requests for issuance from transitioned activities and advancing the work relating to the Article 6.4 mechanism activity cycle.

## **5. Subsequent work and timelines**

15. If the Supervisory Body approves one of the options as referred to in paragraph 9 above, the secretariat will implement the corresponding transition plan as referred to in paragraph 13 above.

## **6. Recommendation to the Supervisory Body**

16. The secretariat recommends that the Supervisory Body consider the information and proposal presented in section 3.3 above and:
  - (a) Adopt one of the options proposed in paragraph 9 above;
  - (b) Request the secretariat to implement the transition plan as proposed in paragraph 13 above.

## Appendix 1. Lists of designated operational entities and applicant entities

1. Table 1 and table 2 below provide a list of 28 designated operational entities (DOEs) and five applicant entities (AEs), respectively, under the clean development mechanism (CDM). These tables include the sectoral scopes applied for by the AEs and accredited for by the DOEs, the country location of the entities' central office, and the accreditation application dates for AEs and the accreditation expiry dates for DOEs.

**Table 1. List of designated operational entities**

Reference no.	Entity	Country	Sectoral scope for validation/verification	CDM accreditation expiry date
E-0001	Japan Quality Assurance Organization (JQA)	Japan	1, 3-5, 10, 13, 14	20 November 2027
E-0005	TÜV SÜD South Asia Private Limited (TÜV SÜD)	India	1, 3-5, 7, 10, 11, 13-15	31 March 2028
E-0006	Deloitte Tohmatsu Sustainability, Co., Ltd. (DTSUS)	Japan	1-3, 5, 10, 12, 13, 15	21 May 2024
E-0009	Bureau Veritas India Pvt. Ltd. (BVI)	India	1-5, 7-10, 12-15	10 August 2028
E-0021	AENOR INTERNACIONAL, S.A.U. (AENOR)	Spain	1-15	21 May 2024
E-0022	TÜV NORD CERT GmbH (TÜV NORD)	Germany	1-16	4 January 2024
E-0024	Colombian Institute for Technical Standards and Certification (ICONTEC)	Colombia	1-3, 7, 13, 14	21 May 2024
E-0025	Korean Foundation for Quality (KFQ)	Republic of Korea	1-5, 9, 11, 13, 15	20 July 2027
E-0032	LGAI Technological Center, S.A. (LGA Tech. Center S.A)	Spain	1, 3, 13	4 January 2024
E-0034	China Environmental United Certification Center Co., Ltd. (CEC)	China	1-15	11 May 2027
E-0037	RINA Services S.p.A. (RINA)	Italy	1-7, 9-11, 13-15	20 November 2027
E-0039	Korean Standards Association (KSA)	Republic of Korea	1-5, 9, 10, 13-15	20 November 2027
E-0044	China Quality Certification Center (CQC)	China	1-15	20 November 2027
E-0046	China Classification Society Certification Company (CCSC)	China	1-10, 13, 14	28 November 2024

Reference no.	Entity	Country	Sectoral scope for validation/verification	CDM accreditation expiry date
E-0047	CEPREI certification body (CEPREI)	China	1-5, 8-10, 13, 15	7 November 2028
E-0051	KBS Certification Services Pvt. Ltd (KBS)	India	1-5, 7-10, 12-15	28 November 2024
E-0052	Carbon Check (India) Private Ltd. (Carbon Check)	India	1, 3-5, 9, 10, 13, 14	1 June 2024
E-0054	Re Carbon Gözetim Denetim ve Belgelendirme Limited Sirketi (Re Carbon)	Türkiy	1-3, 13, 15	24 March 2027
E-0056	Korea Testing & Research Institute (KTR)	Republic of Korea	1, 3-5, 11, 13	2 March 2027
E-0061	Shenzhen CTI International Certification Co., Ltd (CTI)	China	1-15	30 May 2028
E-0062	EPIC Sustainability Services Pvt. Ltd. (EPIC)	India	1-16	4 January 2024
E-0065	China Building Material Test and Certification Group Co. Ltd. (CTC)	China	1-6, 9-11, 13-16	28 November 2024
E-0066	Earthood Services Private Limited (Earthood)	India	1, 3-7, 9, 10, 13-15	1 August 2024
E-0067	China Certification Center, Inc. (CCCI)	China	1-15	17 April 2025
E-0069	4K Earth Science Private Limited (4KES)	India	1-3, 5, 6, 12-15	14 June 2024
E-0071	Ampere for Renewable Energy (Ampere)	Jordan	1, 3, 13	8 September 2027
E-0072	PONY Testing International Group Co., Ltd. (Pony Test)	China	1-15	24 March 2028
E-0073	Limited Liability Company Small Innovative Enterprise "NES Profexpert" (NES)	Russian Federation	1, 3-5, 10, 14	24 March 2028

**Table 2. List of applicant entities**

<b>Reference no.</b>	<b>Entity</b>	<b>Country</b>	<b>Sectoral scope for validation/verification</b>	<b>CDM Accreditation application date</b>
<b>E-0074</b>	Instituto Nacional de Tecnología Industrial (INTI)	Argentina	1-16	11 March 2022
<b>E-0075</b>	Beijing Carbon Brilliant Technology Ltd. (CBT)	China	1-3, 14	9 August 2022
<b>E-0076</b>	BSI Pacific Limited (BSI PL)	China	1-16	23 August 2022
<b>E-0077</b>	Beijing United Intelligence Certification Co., Ltd (UICC)	China	1-9, 12, 13	28 September 2022
<b>E-0078</b>	E-0078 TÜV Rheinland (China) Ltd. (TUV RHEIN)	China	1-15	19 September 2023

## Appendix 2. Analysis of the proposed options to increase clarity on how to operationalize these options along with pros and cons and justifications

### 1. Accreditation status of current clean development mechanism designated operational entities and applicant entities

1. There are 28 designated operational entities (DOEs) and five applicant entities (AEs) currently under the clean development mechanism (CDM) as listed in appendix 1. Based on the CDM accreditation assessment status under the current accreditation term, these CDM DOEs and AEs can be summarized in five categories as listed the table and explained in this appendix:

**Table. Clean development mechanism accreditation assessment status of current clean development mechanism designated operational entities and applicant entities**

Category no.	Number and type of entity	Accreditation term expiry date	Regular surveillance assessment 1	Regular surveillance assessment 2	Re-accreditation assessment
<b>A</b>	3 designated operational entities (DOEs)	Before January 2024	Conducted	Conducted	Conducted
<b>B</b>	10 DOEs	Between May 2024 and April 2025	Conducted	Conducted	Earliest re-accreditation application to be made between May 2023 and April 2024 (i.e., Re-accreditation assessments are most likely conducted before September 2024)
<b>C</b>	15 DOEs	Between March 2027 and November 2028	Planned between July 2023 and March 2025	Planned between January 2025 and September 2026	Earliest re-accreditation application to be made between March 2026 and November 2027(i.e., Re-accreditation assessments are most likely conducted after September 2024)
<b>D</b>	3 applicant entities	Initial accreditation assessment stage (i.e., on-site assessment conducted)			
<b>E</b>	2 applicant entity	Application stage			

## **2. Elaboration of the two options to increase clarity on how these would be operationalized and pros and cons of, and justification for, the proposed options**

2. This section further elaborates on the two options to increase clarity on how each option would be operationalized. Additionally, it provides the provisions for, pros and cons of, and justifications for the proposed options to address the availability of DOEs for the mechanism established by Article 6, paragraph 4, of the Paris Agreement (Article 6.4 mechanism) by the time the Article 6.4 mechanism activity cycle becomes operational.

### **2.1. Option 1: Allow CDM DOEs to act as Article 6.4 mechanism DOEs without an Article 6.4 mechanism accreditation assessment**

3. This option allows CDM DOEs to act as Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities, if they wish to do so, without being subject to the Article 6.4 mechanism accreditation assessment. These DOEs would be permitted to carry out verification of requests for issuance from transitioned activities under the Article 6.4 mechanism. However, once the Article 6.4 accreditation process becomes operational, these DOEs would be subject to accreditation assessments under the Article 6.4 accreditation process, beginning with the initial accreditation assessment, should they wish to conduct further work under the Article 6.4 mechanism.

4. This option includes the following provisions:

- (a) The CDM DOE must have a willingness to act as an Article 6.4 mechanism DOE, and the initial accreditation application shall be made to the Supervisory Body when the Article 6.4 mechanism accreditation process becomes operational (i.e., expected by April 2024);
- (b) No additional Article 6.4 mechanism accreditation assessment is required before allowing such CDM DOEs to act as Article 6.4 mechanism DOEs;
- (c) Once the Article 6.4 mechanism accreditation process becomes operational, these CDM DOEs shall be subject to accreditation assessments under the Article 6.4 accreditation process, starting with the initial accreditation assessment. Considering that the CDM accreditation assessment stages vary among CDM DOEs, there is a need to further distinguish these CDM DOEs to ensure that the transition process is cost-effective. In this regard, the possible provisions on the conduct of the Article 6.4 mechanism initial accreditation assessment could be further elaborated below for those CDM DOEs and AEs under the different categories as per table above:
  - (i) For CDM DOEs under category A: Depending on the actual CDM assessment status, a simplified Article 6.4 mechanism initial accreditation assessment could be proposed (e.g., a desk review focusing on the differences between the CDM and Article 6.4 mechanism accreditation standards), given that these CDM DOEs' re-accreditation assessments were conducted recently;
  - (ii) For the CDM DOEs under category B: Since the second regular surveillance assessments were conducted recently and those DOEs can apply for their CDM re-accreditation assessments until April 2024, the CDM re-

accreditation assessments for those CDM DOEs under this category are expected to be processed during the time when the Article 6.4 mechanism accreditation process is expected to become operational (i.e., April 2024); therefore, depending on the actual CDM assessment status, the following proposed provisions could be applied:

- a. If only a desk review of the CDM re-accreditation assessment is conducted before the time when the Article 6.4 mechanism accreditation process becomes operational, then the Article 6.4 mechanism initial accreditation assessment contains only the on-site assessment to assess the entire Article 6.4 mechanism accreditation standard requirements;
  - b. If an on-site assessment of the CDM re-accreditation assessment is already conducted before the time when the Article 6.4 mechanism accreditation process becomes operational, then the Article 6.4 mechanism initial accreditation assessment contains only a simplified Article 6.4 mechanism initial accreditation assessment (e.g., desk review focusing on the differences between the CDM and Article 6.4 mechanism accreditation standards);
  - c. If a desk review of the CDM re-accreditation assessment is not yet conducted before the time when the Article 6.4 mechanism accreditation process becomes operational, then both a desk review and an on-site assessment of an Article 6.4 mechanism initial accreditation assessment are required to assess the entire Article 6.4 mechanism accreditation standard requirements;
- (iii) For CDM DOEs under category C: Since the earliest applications for CDM re-accreditation assessments are between March 2026 and November 2027, depending on the actual CDM assessment status, the initial accreditation application shall be made to the Supervisory Body by the time when the Article 6.4 mechanism accreditation process becomes operational, followed by the Article 6.4 mechanism initial accreditation assessment;
- (iv) For the CDM AEs under categories D and E: Those AEs are able to serve as Article 6.4 DOEs only if they are accredited as CDM DOEs. The same operationalization provisions as for category A apply for those AEs which would be granted CDM accreditation status until the Article 6.4 mechanism accreditation process becomes operational. For those AEs which are under the different accreditation stages, depending on the actual CDM assessment status, the same provisions as per paragraph 4(c)(ii) above apply.<sup>1</sup>

5. The pros and cons of Option 1 include:

- (a) The advantages (pros) are as follows:
  - (i) No additional Article 6.4 mechanism accreditation assessment is required before allowing CDM DOEs to act as Article 6.4 mechanism DOEs, thereby

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<sup>1</sup> If there is any new application for CDM accreditation before the Article 6.4 mechanism accreditation process becomes operational, the same provisions as per paragraph 4(c)(iv) are applied to any of the new CDM AEs.

reducing the operating cost of DOEs that operate under the Article 6.4 mechanism;

- (ii) It ensures the prompt availability of DOEs for the Article 6.4 mechanism;
  - (iii) The provisions of the Article 6.4 mechanism initial accreditation assessment are elaborated based on the different stages of the CDM DOEs' accreditation statuses, which can ensure a cost-effective transition process;
- (b) A disadvantage (con) is that since additional Article 6.4 mechanism accreditation requirements might be established by the Supervisory Body, not conducting additional Article 6.4 mechanism accreditation assessments before allowing them to act as Article 6.4 mechanism DOEs as per the Article 6.4 mechanism accreditation standard may result in the risk whereby the Article 6.4 mechanism DOEs may not fully establish the quality management system as per the Article 6.4 mechanism accreditation standard.

## **2.2. Option 2: Allow CDM DOEs to act as Article 6.4 mechanism DOEs if they pass a simplified accreditation assessment**

6. This option allows CDM DOEs to act as Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities if they wish to do so and if they pass a simplified Article 6.4 mechanism accreditation assessment (e.g., a desk review focusing on the differences between the CDM and Article 6.4 mechanism accreditation standards). Once the Article 6.4 accreditation process becomes operational, these CDM DOEs will be subject to Article 6.4 mechanism accreditation assessments under the Article 6.4 mechanism accreditation process, starting with initial accreditation assessment.
7. This option includes the following provisions:
- (a) The Article 6.4 mechanism accreditation standard and procedure are developed and approved by the Supervisory Body;
  - (b) The CDM DOE must have a willingness to act as an Article 6.4 mechanism DOE, and the initial accreditation application shall be made to the Supervisory Body by the time when the Article 6.4 mechanism accreditation process becomes operational (i.e., expected by September 2024);
  - (c) CDM DOEs are subject to a simplified Article 6.4 mechanism accreditation assessment, comprising a desk review to assess the differences between the CDM and Article 6.4 mechanism accreditation standard as to be considered by the Supervisory Body at its eighth meeting, before allowing such CDM DOEs to act as Article 6.4 mechanism DOEs;
  - (d) Once the Article 6.4 mechanism accreditation process becomes operational, these CDM DOEs will be subject to Article 6.4 mechanism accreditation assessments under the Article 6.4 mechanism accreditation process, beginning with the initial accreditation assessment. Considering that the CDM accreditation assessment stages vary among CDM DOEs, there is a need to further distinguish them to ensure that the transition process is cost-effective. In this regard, depending on the actual CDM assessment status, the possible provisions for conducting the Article 6.4 mechanism initial accreditation assessment, as elaborated under Option 1 above in paragraph 4(c), could be applied mutatis mutandis.



8. The pros and cons of Option 2 include:
- (a) The advantages (pros) are as follows:
    - (i) Simplified Article 6.4 mechanism accreditation assessments would expedite the availability of DOEs for the Article 6.4 mechanism while ensuring that CDM DOEs serving the initial needs of the Article 6.4 mechanism have sufficient quality management systems in place as per Article 6.4 mechanism accreditation requirements, although there is no additional competence required for these CDM DOEs to perform verification/certification activities of requests for issuance from transitioned activities;
    - (ii) Provisions of the Article 6.4 mechanism initial accreditation assessment are elaborated based on the different stages of CDM DOEs' accreditation statuses, which can ensure a cost-effective transition process;
  - (b) The disadvantages (cons) are as follows:
    - (i) Additional operating costs for the CDM DOEs are incurred as these DOEs would be subject to simplified Article 6.4 mechanism accreditation assessments before allowing such CDM DOEs to act as Article 6.4 mechanism DOEs;
    - (ii) There may be a gap in the availability of Article 6.4 mechanism DOEs in the event that the operationalization of the Article 6.4 mechanism accreditation process takes longer than planned.

### **3. Transition plans based on these two options**

9. This section further outlines the transition plan based on each option, with the aim to ensure availability of the DOEs under the Article 6.4 mechanism and facilitate the transition process by elaborating the proposed step-wise actions to be undertaken by related actors.<sup>2</sup>

#### **3.1. Transition plan for Option 1**

10. Since Option 1 does not require conducting a simplified desk review, the proposed transition plan is as follows:
- (a) The secretariat launches a survey with the CDM DOE seeking its willingness to act as an Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities by sending an email via a dedicated email address to the secretariat between 6 and 30 November 2023;
  - (b) The secretariat presents the outcome of the survey to the Supervisory Body for approval at its first meeting in 2024;
  - (c) The CDM DOE approved by the Supervisory Body is allowed to conduct verification of requests for issuance from transitioned activities until the Article 6.4 mechanism DOEs become available.

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<sup>2</sup> The proposed timelines indicated in this section are based on the assumption that the Article 6.4 accreditation standard and Article 6.4 accreditation procedure are approved by the Supervisory Body at its eighth meeting.

### 3.2. Transition plan for Option 2

11. Since Option 2 is required to conduct a simplified desk review, the proposed transition plan is further elaborated as follows:

- (a) The secretariat launches a survey with the CDM DOE seeking its willingness to act as an Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities by sending an email via a dedicated email address to the secretariat between 6 and 30 November 2023;
- (b) The secretariat prepares a list of Article 6.4 mechanism quality management system (QMS) related documents that a DOE needs to submit for its simplified desk review between 15 – 30 November 2023;
- (c) The CDM DOE establishes its Article 6.4 mechanism QMS covering the differences between CDM accreditation standard and the approved Article 6.4 accreditation standard and submits its documentation to the secretariat between 1 and 31 December 2023;
- (d) The secretariat prepares the simplified desk review process and provide a training to the assessment team members<sup>3</sup> between 15 and 31 December 2023;
- (e) The assessment team established by the secretariat conducts the simplified desk review between 1 January and 30 September 2024, with the modalities of the simplified desk review as below:
  - (i) The assessment team includes one team leader and one team member and the simplified desk review includes two rounds (initial and final rounds) of review. Provisions of fees referred to in appendix 9 of the Article 6.4 mechanism accreditation procedure shall apply, except that
    - a. There is no application fee for a simplified desk review;
    - b. The level of fees for an assessment team undertakes simplified desk review include:
      - i. If a simplified desk review is concluded in the initial round (i.e. first round): One person-days for assessment team leader and one person-days for assessment team member;
      - ii. If a simplified desk review is concluded in the final round (i.e. second round): Two person-days for assessment team leader and one person-days for assessment team member;
  - (ii) The assessment team undertakes the simplified desk review of the application documentation as referred to in paragraph 11(c) above. If the assessment team determines that:
    - a. The information contained in the application documentation adequate at the initial round of the simplified desk review, it shall prepare and finalize a finalized desk review report (i.e. the simplified desk review

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<sup>3</sup> The assessment team members are selected from the Article 6.4 mechanism accreditation roster of experts and the secretariat staff members who are also the CDM accreditation roster of experts.

template) and send it to the DOE within 14 days of receipt of the documents as referred to in paragraph 11(c) above;

- b. There is missing, unclear and/or inadequate information in the application documentation as referred to in paragraph 11(c) above at the initial round of the simplified desk review, it shall prepare a draft simplified desk review report including the issues identified and send it to the DOE within 14 days of receipt of the documents referred to in paragraph 11(c) above, and request the DOE to provide additional and/or amended documentation;
- (iii) The DOE shall provide the requested additional and/or amended documentation within 14 days of receipt of the draft simplified desk review report as referred to in paragraph 11(e)(ii)ii in order for the assessment team to conduct the final round of simplified desk review;
- (iv) No later than 28 days after sending the draft desk review report to the DOE, the assessment team shall prepare a final simplified desk review report at the final round of simplified desk review;
- (f) The secretariat presents the outcomes of the CDM DOEs willing to act as Article 6.4 mechanism DOEs to conduct verification of requests for issuance from transitioned activities, along with its finalized simplified desk review report, to the Supervisory Body for consideration and approval starting from its first meeting in 2024;
- (g) The CDM DOE approved by the Supervisory Body is allowed to conduct verification of requests for issuance from transitioned activities until the Article 6.4 mechanism DOEs become available.

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