

A6.4-SB009-A02

Recommendation

Activities involving removals under the Article 6.4 mechanism

Version: 01.1



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1. Procedural background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), by its decision 3/CMA.3 “Rules, modalities and procedures for the mechanism established by Article 6, paragraph 4, of the Paris Agreement”, paragraph 6(c), requested the Supervisory Body of the mechanism established by Article 6, paragraph 4, of the Paris Agreement (Article 6.4 mechanism) to elaborate and further develop, on the basis of the rules, modalities and procedures of the Article 6.4 mechanism (RMP), recommendations on activities involving removals, including appropriate monitoring, reporting, accounting for removals and crediting periods, addressing reversals, avoidance of leakage, and avoidance of other negative environmental and social impacts, in addition to the activities referred to in chapter V of the RMP (Article 6, paragraph 4, activity cycle), to be considered at its fourth session (November 2022).¹
2. In response to this request, the Supervisory Body agreed on the recommendations on activities involving removals under the Article 6.4 mechanism contained in the annex to the addendum of its annual report to the CMA at its fourth session².
3. The CMA, by its decision 7/CMA.4, paragraphs 19 and 20, invited Parties and admitted observer organizations to submit, via the submission portal, by 15 March 2023, their views on activities involving removals and requested the Supervisory Body to consider the views of Parties and observers in elaborating and further developing recommendations on activities involving removals, while taking into account the mandate provided to the Supervisory Body contained in paragraph 24(a)(ix) of the RMP, and considering broader inputs from stakeholders provided in a structured public consultation process.
4. Based on the request of the CMA in its decision 3/CMA.3 and decision 7/CMA.4 and taking into account views of Parties and observers as well as inputs from stakeholders, the Supervisory Body approved the recommendation to the CMA related to “Activities involving removals under the Article 6.4 mechanism”, as contained in this document.

2. Context of removals under this guidance

2.1 Context

5. Relevant extracts from the Intergovernmental Panel on Climate Change (IPCC) Sixth Assessment Report (AR6) Working Group III (WGIII) definitions of activities involving removals include the following:
 - (a) Anthropogenic removals as the withdrawal of greenhouse gases (GHGs) from the atmosphere as a result of deliberate human activities. (IPCC AR6 WGIII report glossary);
 - (b) Carbon dioxide removal (CO₂; CDR) as anthropogenic activities removing CO₂ from the atmosphere and durably storing it in geological, terrestrial, or ocean reservoirs, or in products. It includes existing and potential anthropogenic enhancement of biological, geochemical or chemical CO₂ sinks, but excludes natural CO₂ uptake not directly caused by human activities. (IPCC AR-6 WG III technical summary).

¹ Document FCCC/PA/CMA/2021/10/Add.1 available at: <https://unfccc.int/documents/460950>.

² Document FCCC/PA/CMA/2022/6/Add.1 available at : <https://unfccc.int/event/cma-4?item=14>.

2.2 Definitions

6. For the purposes of this guidance,
 - (a) **Removals** are the outcomes of processes to remove greenhouse gases from the atmosphere through anthropogenic activities and destroy³ or durably store them.
 - (b) **Activities involving removals** meet the requirements referred to in Paragraph 7. Any examples in this guidance referring to specific activity types or categories are purely illustrative and do not give effect to decisions by the Supervisory Body regarding their use under the Article 6.4 mechanism unless explicitly indicated as such.

3. Requirements

7. Activities involving removals under the Article 6.4 mechanism shall meet the requirements contained in the sections below and in any further requirements developed and approved by the Supervisory Body for activities involving removals based on the requirements contained in the RMP and any further relevant decisions of the CMA, and all relevant Article 6.4 mechanism standards and procedures including the requirements for the development and assessment of article 6.4 mechanism methodologies.

3.1. Monitoring

8. Activity participants shall⁴ monitor removals through an appropriate application of quantification and estimation based on field measurements, remote sensing, measurement through instrumentation, or modelling, in combination as necessary. In this regard, methodologies shall contain provisions that specify the monitoring approach(es) for all parameters needed for the calculation of removals according to the types of removal activities.
9. Methodologies shall contain provisions that ensure that the approaches related to the use of measurements, sampling, data from third parties, published literature, satellite data, default values or modelled data, are robust, statistically representative, and conservative, and appropriately address uncertainty.
10. Methodologies shall contain provisions that require the calculation of removals and associated uncertainties. The methodologies shall specify the limits for the uncertainties for the calculation of removals. The methodologies shall require the activity participants to demonstrate that the calculated removals are within the limits specified in the methodologies applied. If the uncertainty of estimated removals exceeds the specified limits, owing to factors that are not under the control of the activity participants, mechanisms methodologies may specify methods for adjusting the calculated values in a conservative manner.
11. Calculation of removals may employ conservative default values that appropriately address uncertainty, to allow flexibility in monitoring.
12. Methodologies may include provisions for the use of higher tier methods such as the use of measured values in lieu of conservative default values in the instance that the default values are demonstrated to underestimate an activity's net removals.

³ Does not refer to 6.4 mechanism activities engaging in point-source capture and destruction of GHGs that are eligible for crediting for emissions reductions based on measured volumes.

⁴ For normative references, refer to section 4 *Normative reference* of the requirements for the development and assessment of article 6.4 mechanism methodologies

13. Methodologies contain provisions that require appropriate quality assurance and quality control measures, such as cross-checking the monitoring results with other sources of data and published literature, or calibration of measuring equipment at regular intervals.
14. Monitoring plans shall include monitoring of measures to mitigate risks identified in the reversal risk assessment tool and Article 6.4 Mechanism Sustainable Development Tool.
15. Methodologies shall contain provisions that require activity participants to submit a monitoring plan at the registration of the activity. Monitoring plan shall be reviewed and updated at the start of each crediting period, as well as in any of the following circumstances:
 - (a) When verification reveals a need for a revision of the monitoring plan;
 - (b) Following any significant reversal event that reveals a risk factor that is not already included or may have been underestimated in the monitoring plan and corresponding risk assessment;
 - (c) As per existing and applicable national or regional regulations as specified by the host Party.

3.2. Post-crediting period monitoring, reporting, and remediation of reversals

16. Monitoring shall also be conducted after the end of the last active⁵ crediting period of the activity, to ensure that the residual risk of reversals of removals for which 6.4ERs were issued is negligible and/or that potential future reversals are remediated.
17. During the post-crediting monitoring period, activity participants shall undertake monitoring, reporting, verification, and remediation measures to confirm the continued existence of removals and to address any reversals of removals for which 6.4 ERs were issued during the activity's active crediting period(s). No ERs will be issued for removals generated after the last active crediting period, including during the post-crediting monitoring period.
18. Activity participants may submit requests to conclude post-crediting monitoring, by demonstrating for the consideration and approval of the Supervisory Body, evidence that the removals will be stored with negligible risk of reversal and/or that potential future reversals of removals for which 6.4ERs have been issued have been remediated as though a reversal has occurred as per section 3.6.3 *Addressing reversal risk and reversals* of this guidance, taking into account the residual reversal risk of the activity based on its current reversal risk assessment.
19. Activity participants shall indicate the arrangements for monitoring, reporting, and remediating any reversals during the post-crediting monitoring period in the project design document and communicate any updates to the plan at each renewal of the crediting period and before the end of the last active crediting period.
20. The Supervisory Body will develop further guidance in this regard including:
 - (a) Further requirements and identification of the existing requirements that are applicable during the post crediting period for monitoring, reporting, and verification of removals and remediation of reversals, including consideration of options to use methods based on digital technologies and remote sensing;

⁵ "Last active crediting period" refers to the last crediting period during which the activity was implemented for the purpose of issuing ERs, which can describe any of the three possible crediting periods permitted by 6.4 RMPs (subject to renewal procedures).

- (b) The timeframe for post-crediting monitoring, including factors that inform duration and phasing;
- (c) The submissions referred to in paragraph 18 above, including *inter alia* on the evidence-based demonstration by the activity participant and on the consideration and approval given by the Supervisory Body.

3.3. Reporting

- 21. Activity participants shall prepare monitoring reports after implementing monitoring operations and methods as specified in monitoring plans, including for seeking issuance of ERs.
- 22. Monitoring reports shall contain:
 - (a) An outline of the monitoring plan with a description of the monitoring operations and methods used to implement the plan, and the resulting calculated removals during the monitoring period along with the associated uncertainties in the calculation;
 - (b) Field data collected, including remotely sensed data, or if the data set is too voluminous, a summary of the data and an indication of how the complete data set may be accessed;
 - (c) Records and logs of observed events that could potentially lead to the reversal of removals as well as a summary of any reversal notifications that were submitted during the monitoring period;
 - (d) Estimates of any reversals that occurred during each monitoring period, including descriptive information on how reversals occurred, whether they were avoidable or unavoidable, and remedial actions taken;
 - (e) Information on how the environmental and social impacts were assessed and addressed by applying robust environmental and social safeguards as per Section 3.8 *Avoidance of other negative environmental and social impacts*, as well as how the activity is fostering sustainable development through the utilization of the Article 6.4 sustainable development tool.
 - (f) Information on how reversal risks were assessed and addressed consistent with risk mitigation measures described in the reversal risk assessment tool that will be developed by the Supervisory Body.
- 23. Monitoring reports shall be prepared without a gap between the two successive monitoring periods, which may be of the same or different durations according to the activity participant's implementation of paragraph 22 above.
- 24. Methodologies shall contain provisions to specify the minimum frequency of monitoring report submission, which shall be commensurate with the degree and nature of the risk of reversals determined through a risk assessment undertaken by the activity participants as per 3.6.1. *Reversal risk assessment*. Based on the results of the risk assessment referred to above, the frequency may range from one to five years from the submission date of the first monitoring report. Activity participants may choose a shorter period for monitoring than the specified minimum frequency. A reversal event may also trigger the preparation of a monitoring report as described in 3.6.2 *Post reversal actions*.
- 25. Methodologies shall contain provisions to specify the maximum duration allowed to submit the first monitoring report from the start date of the first crediting period. Based on the results of the risk assessment referred to in section 3.6.1. *Reversal risk assessment*, the

duration may range from one to five years from the start date of the first crediting period. Methodologies shall contain provisions to require submission of subsequent monitoring reports at least every two years for activities with high reversal risk or at least every five years for those with low reversal risk.

26. The Supervisory Body will develop guidance on and procedures for addressing late, incomplete, or missing monitoring report submissions including remedial measures to address situations where monitoring is stopped prematurely, i.e., prior to the conclusion of the crediting period(s) and fulfilment of requirements for post-crediting period monitoring. The guidance will address options for giving effect to the remediation of reversals of removals for which 6.4ERs have been issued in such circumstances.

3.4. Accounting for removals

27. Removals eligible for crediting shall exceed the applicable baseline determined in accordance with requirements for the development and assessment of Article 6.4 mechanism methodologies and are calculated for each year in the crediting period. In each given monitoring report, such calculations are done in accordance with the following:

- (a) by calculating net removals, which involves the estimation and deduction of emissions within the activity boundary that result from the implementation of the activity and/or from an event that could potentially lead to a reversal of removals, and any leakage emissions, in accordance with the applicable provisions of the Activity Standard, requirements for the development and assessment of Article 6.4 mechanism methodologies, and the applicable methodology; and
- (b) by comparing the current cumulative net removals to cumulative net removals in the previous monitoring report. Current cumulative net removals that fall below the cumulative net removals in the previous monitoring report constitute reversals.

28. Removals are also calculated as per paragraph 27 for each year in the post-crediting monitoring period as indicated in paragraphs 16-18.

29. Any carbon pools and greenhouse gases may be optionally excluded from accounting, if such exclusion results in a more conservative calculation of net removals, which shall be demonstrated in the PDD.

30. If an activity involving removals also results in emission reductions, relevant guidance shall be applied through a relevant methodology or a combination of methodologies applicable to the activity in accordance with the provisions to be developed by the Supervisory Body.

3.5. Methodologies applicable for the crediting period

31. At the renewal of the crediting period, activities involving removals shall apply the latest version of the applicable methodology.

3.6. Addressing reversals

32. Activity participants shall minimize the risk of the release of stored removals and, where such reversals of removals occur, ensure that these are addressed in full, in accordance with guidance in this document.

3.6.1. Reversal risk assessment

33. The risks of reversals may be avoidable or unavoidable and may include, inter alia:
- (a) those related to activity finances and management;

- (b) those related to asset ownership, rising opportunity costs, regulatory and social instability, country-specific political risks and legal risks;
 - (c) those related to fires, pests, and droughts.
34. Activity participants shall conduct a risk assessment at the activity level using robust methods to identify and assess the reversal risks, including to quantify and score them, for instance the nature, scale, likelihood, and duration of the risks and of potential reversals. The percent-based reversal risk rating resulting from this assessment shall inform, among other procedures, an activity's application of remediation measures referred to in *3.6.3 Addressing reversal risk and reversals*.
35. Activity participants shall also develop and describe plans to mitigate and monitor the risks and steps taken. Risks that cannot be eliminated shall be addressed as described below in this document.
36. Activity participants shall review and revise the risk assessment every five years from the start of the first crediting period, as well as in any of the circumstances specified in paragraph 15 (a)–(c).
37. The Supervisory Body will develop a reversal risk assessment tool. Methodologies may include additional guidance on the application of the tool.

3.6.2. Post reversal actions

3.6.2.1. Reversal-related Notifications and actions

38. The activity participant shall notify the Supervisory Body of reversals that occur within their activity boundary. Submissions of reversal-related notifications shall be made as follows:
- (a) A preliminary notification shall be provided within 30 days of an event that could potentially lead to a reversal becoming known (hereafter "observed event"), taking into account risks identified in the risk assessment and the applied methodology, including, at a minimum, the date, the location, and a short description of the event. It may be provided digitally;
 - (b) Activity participants wishing to demonstrate that removals for which 6.4ERs have been issued were not disturbed by the observed event prior to submitting a full monitoring report shall submit a verified monitoring report of the information referred to in paragraphs 22 (a)-(c) above, which may be provided digitally;
 - (c) A reversal notification as a full monitoring report referred to in paragraph 22 above shall be provided within 360 days of the observed event;
 - (d) In case the reversal event is still ongoing such that a delayed submission of the full monitoring report would result in more complete and accurate information, the activity participant may submit a verified monitoring report referred to in paragraph 38(b) above to request the Supervisory Body to extend deadline for submission of the full monitoring report by 90-180 days from the original submission deadline.
39. Upon submitting a preliminary notification as per paragraph 38(a) above, activity participants will be unable to issue, transfer, or cancel ERs from the activity for which notification was provided until the activity participant submits a verified monitoring report or a full monitoring report demonstrating that removals for which 6.4ERs have been issued were not disturbed by the observed event, or until the 6.4 registry administrator confirms that the reversal has been remediated as per *3.6.3 Addressing reversal risk and reversals*.

40. Following the submission of a full monitoring report that reflects reversals, the Supervisory Body will review the report to confirm, among other things, that the activity proponents have accurately characterized the reversal event as being avoidable or unavoidable. The Activity Participants will be notified of the outcome of the Supervisory Body's review within a timeframe to be specified by the Supervisory Body.
41. The Supervisory Body will develop further guidance in regard to the measures in this section, including the format and procedures for notifications and reports that may be submitted digitally and treatment of notifications from third parties to the Supervisory Body of observed events that could potentially lead to reversals.

3.6.2.2. Corrective actions

42. Following the submission of the preliminary notification referred to in paragraph 38(a), activity participants shall initiate appropriate corrective measures and demonstrate in requisite updates to a reversal risk assessment that accompanies a full monitoring report that reflects reversals, inter alia:
 - (a) Assessing how the reversal occurred and its causes;
 - (b) Elaborating plans to prevent further reversals such as improving control measures, storage conditions and handling procedures, and arranging further personnel training in various aspects of removal process;
 - (c) Reassessing adherence to applicable local and international regulations;
 - (d) Engaging stakeholders in accordance with the procedures of the Supervisory Body;
 - (e) Increasing the activity rating, resulting in increased buffer contributions, if required as per the risk assessment update.

3.6.2.3. Preventive actions

43. Activity participants shall update and submit the reversal risk assessment as per section 3.6.1. *Reversal risk assessment*.
44. Activity participants shall also update the assessment conducted using Article 6.4 mechanism sustainable development tool to reflect the relevant underlying causes and any negative impacts, as well as plans for remediation and prevention of a recurrence, and submit this with the updated reversal risk assessment accompanying the full monitoring report submitted for reversal notification purposes.

3.6.2.4 Activity continuation post-reversal

45. Activity participants shall continue to be responsible for implementation of an activity, including while undertaking the processes required in this section.
46. Activity participant shall only be permitted to issue, transfer, and/or cancel 6.4ERs related to the activity upon fulfilment of the requirements in paragraph 38 above and if the calculated removals meet the requirements in paragraph 27 above.
47. The Supervisory Body will develop further guidance on the treatment of activities for which a reversal results in calculated removals within the activity boundary that fall below the baseline level.

3.6.3. Addressing reversal risk and reversals

48. Reversals of removals for which 6.4 ERs have been issued will be fully remediated by taking measures described in this section. The measures are intended to effectively address reversals and maintain incentives for activity participants to proactively mitigate reversal risks and avoid reversals.
49. Reversals shall be remediated through the cancellation of an equivalent amount of 6.4 ERs. Measures for effecting this cancellation include the cancellation of the Reversal Risk Buffer Pool and/or the direct cancellation of 6.4 ERs from other 6.4 activities for this purpose. These measures may be used on a standalone basis or in combination.
50. The determination of the appropriate remediation measure(s) to be applied by an activity shall be based on the level of the activity's reversal risk rating indicated in the reversal risk assessment submitted in the project design document and, if a reversal occurs, also on the avoidable or unavoidable nature of the event that led to the reversal.
51. The Supervisory Body will develop further guidance and/or procedures in regard to the measures in this section for, inter alia:
 - (a) Review by the Supervisory Body of monitoring reports that reflect reversals, including its consideration of whether an event that led to a reversal was avoidable or unavoidable as represented by activity participants, and its response to instances of possible mis-categorization of such events and subsequent notifications of the registry administrator and activity participants;
 - (b) Reversal Risk Buffer Pool use, operation, and composition, including the treatment of uncanceled Buffer 6.4 ERs and options for addressing buffer insufficiency;
 - (c) Direct cancellation of 6.4 ERs from other 6.4 activities in lieu of contributing to and using the Reversal Risk Buffer Pool, including the threshold for a reversal risk rating that constitutes a negligible reversal risk and would qualify an activity to apply these procedures, as well as the basis and procedures for the Supervisory Body's initial and periodic review and approval of the sufficient coverage of insurance policy or comparable guarantee products for insuring the activities that apply these procedures;
 - (d) The nature of 6.4 ERs from other 6.4 activities that are cancelled to remediate reversals as per the requirements in this section, including whether they are issued in respect of removals and/or emission reductions.

3.6.3.1. Buffer pool operations and contributions

52. The Article 6.4 Supervisory Body shall establish a Reversal Risk Buffer Pool which serves to insure against the general risk of, and to remediate, unavoidable reversals under the 6.4 mechanism. Activity participants applying guidance in this document for activities involving removals shall contribute 6.4 ERs to the Reversal Risk Buffer Pool, which are cancelled in the event of an unavoidable reversal.
53. Upon issuance of 6.4ERs, an amount of 6.4ERs proportionate to the issuing activity's reversal risk rating shall be forwarded to the Reversal Risk Buffer Pool, which is a holding account that aggregates all contributions of Buffer 6.4 ERs. The Reversal Risk Buffer Pool account is overseen by the Supervisory Body and is administered and shall only be accessed by the Article 6.4 mechanism registry administrator.
54. Following the Supervisory Body's review of a full monitoring report that reflects reversals, the Supervisory Body will notify the registry administrator of the results of its review, after

which the registry administrator shall effect a cancellation of Buffer 6.4 ERs equal to the amount of unavoidable reversals requiring remediation. Where possible, reversals should be remediated with 6.4 ERs from the same vintages.

55. Buffer ERs shall not be cancelled to remediate avoidable reversals.
56. The Supervisory Body shall oversee a periodic stress-test of the Reversal Risk Buffer pool at least every three years to assess, inter alia, the pool's resilience for a range of plausible reversal risk scenarios affecting the activities linked to the buffer pool. In addition to regular stress-testing, the composition of the buffer pool, including the share of 6.4 ERs by vintage, region and country, activity type, and methodology, should be published annually.

3.6.3.2. Direct cancellation of 6.4 ERs

57. Reversals of removals for which 6.4 ERs have been issued shall be remediated through the cancellation of an equivalent amount of 6.4 ERs from other 6.4 activities in the following circumstances:
 - (a) Activity participants implementing an activity with negligible reversal risk, as evidenced by the risk assessment, indicate in the project design document that the activity will forego use of the Reversal Risk Buffer Pool throughout all active crediting periods and the post-crediting monitoring period;
 - (b) Activity participants are required to address reversals of removals found to be avoidable, even when the activity is contributing to the Reversal Risk Buffer Pool.
58. In order to apply the option referred to in paragraph 57(a) above, activity participants shall obtain and maintain sufficient coverage under an insurance policy or comparable guarantee product approved by the Supervisory Body to insure the continued implementation of the activity in the instance that reversals occur which require remediation, which shall be submitted with the project design document.
59. Following the Supervisory Body's review of a full monitoring report submitted that reflects reversals and involves the circumstances described in paragraph 57 (a) or (b) above, the Supervisory Body will notify the registry administrator of the results of its review. No more than 30 days following this communication, the 6.4 mechanism registry administrator will confirm with the activity participants the cancellation of 6.4ERs from other 6.4 activities equal to the amount of reversals requiring remediation, and indicating the purpose of cancellation in the 6.4 Registry.

3.6.3.3. Avoidable versus unavoidable reversals

60. The Supervisory Body will develop further guidance on avoidable and unavoidable reversals, including how they are distinguished and demonstrated.

3.7. Avoidance of leakage

61. Activity participants shall address the risk of leakage and account for any remaining leakage in calculations of net removals in accordance with the requirements specified in the "Requirements for the development and assessment of article 6.4 mechanism methodologies", including by applying the tool to be developed by the Supervisory Body for this purpose. Methodologies and related tools may include additional requirements applicable to specific types or categories of removal activities.

3.8. Avoidance of other negative environmental and social impacts

62. Activity participants shall apply robust social and environmental safeguards to minimize and, where possible, avoid negative environmental and social impacts of the activity:
- (a) In accordance with requirements contained in Article 6.4 mechanism activity standard⁶, including the application of the Article 6.4 mechanism sustainable development tool⁷, guidance on local and global stakeholder consultation and where applicable, the Appeals and Grievance Procedure⁸; and
 - (b) Any other applicable provisions developed by the Supervisory Body to avoid negative environmental and social impacts of an activity involving removals.
63. In addition to above requirements, the Supervisory Body will develop further requirements in respect of specific removal activity categories or types taking into account national and international best practices in environmental and social safeguards, which activity participants shall also apply.

3.9. Host Party roles

64. Subject to further guidance that will be developed by the Supervisory Body, based on the RMP and guidance in this document, a host Party may specify to the Supervisory Body arrangements voluntarily provided by the host Party for the following:
- (a) Requiring the activity participants to comply with existing and applicable national or regional regulations *inter alia* specifying the frequency, timing, and/or basis for updating and submitting an updated monitoring plan, in addition and subject to and consistent with the guidance in this document, as referred to in paragraph 15(c) above;
 - (b) Where the host Party assumes the role of an activity participant in the post-crediting monitoring period, providing a sovereign guarantee to apply corresponding adjustments in respect of any amount of reversals incurred, as an alternative measure to those described in Section 3.6.3. *Addressing reversal risk and reversals*, in a manner consistent with Article 6.2 guidance and further guidance to be developed by the Supervisory Body in this regard.

⁶ A6.4-SB008-A04 Standard: Article 6.4 activity standard for projects.

⁷ A6.4-SB008-A10- Draft Tool: Article 6.4 sustainable development tool.

⁸ A6.4-SB008-A09 - Draft Procedure: Appeal and grievance processes under the Article 6.4. mechanism.

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