

A6.4-SBM013-AA-A06

Information note

Compilation of the public inputs on PoAs'
regulatory documents

Version 01.0



COVER NOTE

1. Procedural 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
3. The Supervisory Body, at its fourth meeting, considered the concept note “Development of activity standard, validation and verification standard and activity cycle procedure” prepared by the secretariat, and requested the secretariat to (i) draft activity standards, validation and verification standards, and activity cycle procedures, drawing on the corresponding documents developed for the clean development mechanism, with modifications to accommodate the requirements in the RMPs and the elaboration of the RMPs; and (ii) reflect the guidance provided by the Supervisory Body at that meeting. Such guidance included, among other things, that the secretariat should start with projects and programmes of activities (PoAs) as activity types to be covered by these standards and procedures, and develop two sets of the standards and the procedures (one for projects and the other for PoAs), noting that the Supervisory Body will start considering “other types of activity” that may be registered under the Article 6.4 mechanism in accordance with paragraph 31(b) of the RMPs, such as policy, jurisdictional or sectoral programmes, and may revise these standards and procedures to expand the scope or develop a new set of these standards and procedures, as appropriate.
4. The Supervisory Body, at its eighth meeting, adopted the set of standards and procedure for projects: “Article 6.4 mechanism project standard for projects” (AS-P); “Article 6.4 mechanism validation and verification standard for projects” (VVS-P); and “Article 6.4 mechanism activity cycle procedure for projects” (ACP-P).⁴
5. At its eleventh meeting, the Supervisory Body considered the concept note “Developments of activity standard (AS-PoA), validation and verification standard (VVS-PoA), and activity

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.

⁴ Article 6.4 mechanism activity cycle standards and procedures for projects are available at: <https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body/rules-and-regulations>.

cycle procedure for programmes of activities (ACP-PoA)” as well as the draft procedure “Activity cycle procedure for programmes of activities”, draft standard “Activity standard for programmes and activities” and draft standard “Validation and verification standard for programmes of activities”.

6. At its eleventh meeting, the Supervisory Body further agreed to launch a call for public input on the draft procedure “ACP-PoA”, draft standard “AS-PoA” and draft standard “VVS-PoA” and requested the secretariat to revise the drafts of the regulatory documents for PoAs, taking into account the public inputs received, for consideration by the Supervisory Body at its thirteenth meeting.

2. Purpose

7. The purpose of this information note is to provide a compilation of public inputs received in response to the call for public inputs on draft procedure “ACP-PoA”, draft standard “AS-PoA” and draft standard “VVS-PoA”.
8. The secretariat synthesized, paraphrased and grouped the information in the submissions for easy readability and flow of information. In that process, despite the best efforts, some relevant information may have been unintentionally omitted or not correctly represented. In addition, it was difficult to fit some information under the prevailing elements and categories. Readers are encouraged to consult the full submissions available on the UNFCCC website⁵ to fully understand the background and context in which proposals were made in the submissions.

3. Current work

9. The call for inputs from stakeholders was open from 3 to 31 May 2024. A total of four inputs were received as shown in table 1 below.

Table 1. List of stakeholders who responded to the call for public input⁶

No.	Submission date	Stakeholder
1	31-May	Modern Energy Cooking Services (MECS)
2	31-May	International and Comparative Law Research Center (ICLRC)
3	20-May	KICC (KICC)
4	17-May	General Carbon (GC)

10. The information note compiles the stakeholders' comments and summarizes the changes made to the regulatory documents for PoAs in response to the stakeholders' comments by presenting them into the following sections:
- (a) Section 2.1: Public comments on Draft Procedure: Article 6.4 activity cycle procedure for programmes of activities;

⁵ Details of the call for public input and the full submissions are available at: <https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/calls-for-input/cfi-poa-package>

⁶ In-text citations in this document (e.g. AA) reference stakeholder comments/inputs made to the call for public inputs.

- (b) Section 2.2: Public comments on Draft Standard: Article 6.4 activity standard for programmes of activities;
- (c) Section 2.3: Public comments on Draft Standard: Article 6.4 validation and verification standard for programmes of activities;
- (d) Section 2.4: Other comments;
- (e) Section 3: Changes made to the regulatory documents for PoAs in response to the stakeholders' comments.

4. Subsequent work and timelines

- 11. Further work will be carried out based on the guidance that will be received from the Supervisory Body.

5. Recommendations to the Supervisory Body

- 12. The Supervisory Body may wish to consider this document and take it into account while considering the draft procedure "Article 6.4 activity cycle procedure for programmes of activities" (A6.4-SMB013-AA-A07), draft standard "Article 6.4 activity standard for programmes of activities" (A6.4-SMB013-AA-A08) and draft standard "Article 6.4 validation and verification standard for programmes of activities" (A6.4-SMB013-AA-A09) with a view to adopting them at its thirteenth meeting.

TABLE OF CONTENTS	Page
1. PROCEDURAL BACKGROUND	7
2. KEY ISSUES AND PROPOSED SOLUTIONS.....	7
2.1. Public comments on Draft Procedure: Article 6.4 activity cycle procedure for programmes of activities	7
2.1.1. Summary of public comments on Section 3 “Terms and definitions”	7
2.1.2. Summary of public comments on Section 4.3 “Global stakeholder consultation”	8
2.1.3. Summary of public comments on Section 4.4 “Host Party approval”	8
2.1.4. Summary of public comments on Section 5 “Registration of programme of activities”	9
2.1.5. Summary of public comments on Section 6 “Post-registration activities”	9
2.1.6. Summary of public comments on Section 8 “Issuance of Article 6.4 emission reductions”	10
2.1.7. Summary of public comments on Section 11 “Withdrawal of approval of a programme of activities or authorization of activity participant”	10
2.2. Public comments on Draft Standard: Article 6.4 activity standard for programmes of activities	10
2.2.1. Summary of public comments on Section 3 “Terms and definitions”	10
2.2.2. Summary of public comments on Section 6 “Design of programme of activities”	11
2.2.3. Summary of public comments on Section 8 “Post-registration activities”	12
2.2.4. Summary of public comments on Appendix 2 “Modalities of local stakeholder consultation”	12
2.3. Public comments on Draft Standard: Article 6.4 validation and verification standard for programmes of activities	12
2.3.1. Summary of public comments on Section 3 “Terms and definitions”	12
2.3.2. Summary of public comments on Section 5 “General validation and verification requirements”	13

2.3.3.	Summary of public comments on Section 6 “Validation for registration of programmes of activities”	13
2.3.4.	Summary of public comments on Section 7 “Validation for inclusion of component projects”	14
2.3.5.	Summary of public comments on Section 9 “Verification of implementation and monitoring”	14
2.4.	Other comments	14
2.4.1.	Summary of comments on A6.4-PROC-AC-001 Procedure: Transition of CDM activities to the Article 6.4 mechanism	14
3.	CHANGES MADE TO THE REGULATORY DOCUMENTS FOR POAS IN RESPONSE TO THE STAKEHOLDERS’ COMMENTS	15
APPENDIX. DETAILED COMMENTS AND PROPOSALS SUBMITTED BY STAKEHOLDERS	17

1. Procedural 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
3. At its eleventh meeting, the Supervisory Body considered the concept note “Development of activity standard (AS-PoA), validation and verification standard (VVS-PoA), and activity cycle procedure for programmes of activities” (ACP-PoA) as well as draft procedure “Activity cycle procedure for programmes of activities”, draft standard “Activity standard for programmes and activities” and draft standard “Validation and verification standard for programmes of activities and agreed to launch a call for public input on the drafts of the regulatory documents for programmes of activities (PoAs) and requested the secretariat to revise the drafts of AS-PoA, VVS-PoA and ACP-PoA, taking into account the public inputs received, for consideration by the Supervisory Body at its thirteenth meeting.

2. Key issues and proposed solutions

2.1. Public comments on Draft Procedure: Article 6.4 activity cycle procedure for programmes of activities

2.1.1. Summary of public comments on Section 3 “Terms and definitions”

4. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.
5. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is

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.

recommended that the term "A6.4 activities" in the meaning of "Article 6.4 mechanism projects and PoAs" not be introduced or be replaced with another term (e.g., "A6.4 projects and PoAs") to avoid an unjustified limitation of the term "activity". This is even more important since Para 8(e) of the draft document uses the term "Article 6, paragraph 4, activity (A6.4 activity)," creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one document.

2.1.2. Summary of public comments on Section 4.3 "Global stakeholder consultation"

6. **Comment by MECS:** While the Local Stakeholder Consultation is mentioned in the Standard, it is not in the Procedure.

2.1.3. Summary of public comments on Section 4.4 "Host Party approval"

7. **Comment by GC:** Host country approval – timeline for submission is provided. However, timeline for approval not provided.
8. **Comment by ICLRC:** 1) The Parties to the Paris Agreement undertake certain endeavours and implement activities related to the Parties' commitments under the Paris Agreement in order to reach its goals. The implementation of such activities, whether directly or through authorized entities, may directly affect the level of endeavours a Party must undertake, the ability of the host Party to reach its NDC, and other significant aspects of the Party's state of affairs. Each and every aspect of a proposed A6.4 activity is of importance to a Party (and not only to the Supervisory Body). A Party should have access to the maximum available information about the proposed A6.4 PoA and the PoA participants before the Parties make any decision to approve the A6.4 PoA and/or authorize PoA participants. Consequently, it seems reasonable that a Party (especially a host Party) should be able to establish and enforce its national rules and procedure leading to the approval of an A6.4 PoA and the authorization of the entities involved in such an activity. The Parties should be able to collect and examine documents and information about the proposed activity and the involved entities as they consider appropriate and reasonable. The draft documents may be considered as lacking a focus on that important role of a Party. In particular, the proposed regulation may be interpreted as depriving the Parties, and in particular, the host Party, of the right to establish their national rules and procedures required for approving the proposed A6.4 PoAs and authorizing PoA participants. It is recommended that the proposed regulation of the said Section consider the right of a Party to establish and apply its national rules and procedures to be followed by the potential activity participants, as well as establish the Party's specific requirements to be met by the potential activity participants in order for the Party to decide on approving the A6.4 PoAs and authorizing the PoA participants. Exercising such rights by a Party might facilitate the Party's improved selection of A6.4 PoAs and the fulfilment of its reporting obligations (including, inter alia, those set forth in Section IV of Decision 2/CMA.2). 2) Given the crucial role of the host Party and the potential impact on its NDC resulting from the implementation of the A6.4 PoA, it is recommended that the proposed regulation considers the host Party's right to exercise the "final say." In particular, the host Party should have the option to consider another Party's approval/authorization before making its own decision on the approval of the A6.4 PoA and/or the authorization of PoA participants. 3) The right of a Party to request and examine additional documents and information, at the Party's discretion, from potential A6.4 PoA participants is recommended to be clearly established.

9. **Comment by ICLRC:** According to Para 42 of the RMP, “the host Party shall provide a statement to the Supervisory Body specifying whether it authorizes A6.4ERs issued for the activity for use towards achievement of NDCs and/or for other international mitigation purposes as defined in decision 2/CMA.3. If the host Party authorizes any such uses, the Party may provide relevant information on the authorization, such as any applicable terms and provisions.” The draft documents do not establish any procedure that could be followed by a Party to exercise that right. Therefore, it is recommended that the draft regulation be amended to avoid a possible misinterpretation of the proposed regulation set forth in the draft document with the mentioned rule of the RMP, as well as to avoid a possible limitation of the corresponding rights of a Party. Also, it is important to ensure (by amending the draft document accordingly) that if any such terms and provisions have been provided by a Party, the approved PoAs and CPs comply with those terms and provisions, and that such compliance is confirmed throughout the lifecycle of the PoA/CP.
10. **Comment by KICC:** KICC understands that Supervisory Body has placed a placeholder for possible provisions on the submission of the statement of authorization on the use of A6.4ERs. In this section, we propose including a detailed guideline that clarifies the timeline for authorization, the possibility of changing the authorization of use, and the implications or practical steps to follow upon such a change including providing a form to approve/effect changing the authorization of use.
11. **Comment by ICLRC:** Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.
- 2.1.4. Summary of public comments on Section 5 “Registration of programme of activities”**
12. **Comment by GC:** 5.1.4. Finalizing the request for registration if no request for review – If the host country approval is not obtained, how can supervisory body approve for the registration of the project. What will happen to NDCs and ITMOs when the project moves ahead and if the entity wants to attach the CERs to the country's NDCs and if it has to exchange.
- 2.1.5. Summary of public comments on Section 6 “Post-registration activities”**
13. **Comment by GC:** Reported issues resulting from insolvency and/or disputes on modalities of communication – During any time of the project the Secretariat should deem the project void and closed, if the disputes are not resolved and there are still gaps in the modalities and procedure including the Article 6.4 credits availing.
14. **Comment by ICLRC:** Given the fact that any aspect of the authorized A6.4 PoAs and their participants may be of importance to a Party (and in particular, a host Party), no change relating to PoAs or CPs as described in the draft document be made without a preliminary approval from the Party (and in particular, the host Party). It is recommended that the draft document be amended accordingly.
15. **Comment by ICLRC:** It is recommended that not only “insolvency” and “disputes”-related issues be considered in the context of the proposed regulation, but also any other events

(such as, e.g., the liquidation of an activity participant for any reason, etc.) which may lead to the same consequences.

2.1.6. Summary of public comments on Section 8 “Issuance of Article 6.4 emission reductions”

16. **Comment by ICLRC:** When it comes to the submission of a request for issuance of A6.4ERs, the processing of the uploaded documents should also be automatically stopped if the total number of A6.4ERs requested for issuance under that PoA/CP exceeds the maximum total amount approved by the host Party.
17. **Comment by ICLRC:** The proposed regulation is ambiguous regarding the possibility of changing the number of A6.4.ERs to be issued (compared to the number of A6.4ERs requested for issuance in the corresponding request for issuance) as a result of the review process. For example, Paras 210(a) and 215(a) may be interpreted as only allowing either the issuance of the originally requested number of A6.4ERs or the rejection of the request for issuance. The rest of the related regulation is also unclear on that point and only covers the procedure for changing the fees (see Para 219). Overall, there is a lack of regulation in this regard. It is recommended that the proposed regulation be amended to expressly set forth the possibility of changing (e.g., reducing) the number of A6.4ERs as a result of the review process, and to outline the procedure related to such a change.
18. **Comment by GC:** 8.3. Withdrawal of request for issuance 8.3.1. Submission of request for withdrawal. The duration timeline provided for withdrawal not mentioned.

2.1.7. Summary of public comments on Section 11 “Withdrawal of approval of a programme of activities or authorization of activity participant”

19. **Comment by KICC:** KICC believes that the secretariat should carefully review the appropriateness of withdrawal notifications by host parties based on stringent rules and conditions. To prevent unreasonable revocation of authorization and approval, KICC strongly support that the secretariat has the authority to deny the withdrawal of authorization/approval by the host parties.

2.2. Public comments on Draft Standard: Article 6.4 activity standard for programmes of activities

2.2.1. Summary of public comments on Section 3 “Terms and definitions”

20. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.
21. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). This is even more important since Para 8(e) of ACP-PoA (A6.4-SB011-A04) uses the term “Article 6,

paragraph 4, activity (A6.4 activity),” creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one of the interrelated documents. Therefore, it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4 mechanism projects and PoAs” not be introduced or be replaced with another term (e.g., “A6.4 projects and PoAs”) to avoid an unjustified limitation of the term “activity”.

2.2.2. Summary of public comments on Section 6 “Design of programme of activities”

22. **Comment by ICLRC:** According to Para 42 of the RMP, “the host Party shall provide a statement to the Supervisory Body specifying whether it authorizes A6.4ERs issued for the activity for use towards achievement of NDCs and/or for other international mitigation purposes as defined in decision 2/CMA.3. If the host Party authorizes any such uses, the Party may provide relevant information on the authorization, such as any applicable terms and provisions.” The draft documents do not establish any procedure that could be followed by a Party to exercise that right. Therefore, it is recommended that the draft regulation be amended to avoid a possible misinterpretation of the proposed regulation set forth in the draft document with the mentioned rule of the RMP, as well as to avoid a possible limitation of the corresponding rights of a Party. Also, it is important to ensure (by amending the draft document accordingly) that if any such terms and provisions have been provided by a Party, the approved PoAs and CPs comply with those terms and provisions, and that such compliance is confirmed throughout the lifecycle of the PoA/CP.
23. **Comment by KICC:** KICC would like to seek clarification on the applicability of this clause to CDM PoAs that are transitioned to A6.4M. For existing CDM PoAs, authorization has already been granted for activity participants. If a CDM PoA transitions to A6.4M, do the existing authorized activity participants need to seek new authorization under A6.4M? If new authorization is required under A6.4M, will the requirements outlined in this draft standard for A6.4 mechanism apply? Or will there be separate guidance or procedures specifically for transitioned PoAs? If the requirements outlined in this draft are to be followed by the transitioned PoAs, KICC strongly believes that activity participants should obtain authorization solely from the host parties of the transitioned CPs. Requiring authorization from all the host parties under the original CDM PoA would be unreasonable and impractical.
24. **Comment by ICLRC:** Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.
25. **Comment by ICLRC:** To avoid potential double counting, issuance and other negative results of any A6.4 activity, an A6.4 PoA /CP is recommended to have no other registrations, not pursue for registration under, nor be included in a programme under any other international, regional, national, or subnational GHG mitigation crediting scheme. Also, since these days the registration of mitigation activities, as well as issuance (and encumbrance) of resulting mitigation outcomes is possible not only through programmes, or international, national and subnational GHG mitigation crediting schemes, but through private instruments also (e.g., through the use of blockchain solutions not requiring participation of any independent standards/programme operators or authorities of any level), it is recommended that such “other initiatives” be included in the draft documents

alongside other programmes, as well as any other international, regional, national, subnational or sector-wide GHG mitigation crediting schemes.

2.2.3. Summary of public comments on Section 8 “Post-registration activities”

26. **Comment by ICLRC:** Given the fact that any aspect of the authorized A6.4 PoAs and their participants may be of importance to a Party (and in particular, a host Party), no change relating to PoAs or CPs as described in the draft document be made without a preliminary approval from the Party (and in particular, the host Party). It is recommended that the draft document be amended accordingly.

2.2.4. Summary of public comments on Appendix 2 “Modalities of local stakeholder consultation”

27. **Comment by ICLRC:** It is recommended to introduce a clear distinction between the “local stakeholders” and “subnational stakeholders” should there is a justified need in distinguishing those two groups of stakeholders.
28. **Comment by ICLRC:** The proposed modalities of local stakeholder consultations seem to lack a unified approach. For example, it leaves it to the A6.4 PoA participants to decide on the major elements of the methods of conducting such consultations. Such an approach may, among other things, lead to a lack of conformity and complications in determining whether the consultations have indeed been conducted properly. Simultaneously, the proposed regulation imposes certain obligations on the A6.4 PoA, which, on one hand, may be challenging to fulfil (e.g., obtaining correct addresses for local stakeholders, to fulfil obligation under Para 3 of Appendix 2) and, on the other hand, may be impossible to verify (e.g., confirming that invitations have been sent using the correct addresses of local stakeholders). It may, therefore, be worth considering the standardization of this process by channelling local stakeholder consultations through the DNA and its public resources (e.g., the DNA's website with information about the proposed A6.4 PoA being published) and inviting local stakeholders to submit their inputs through those resources.
29. **Comment by MECS:** Local stakeholder consultation is expected to be carried out before either the project start date or the submission of the design document to the DoE, whichever is earlier.

2.3. Public comments on Draft Standard: Article 6.4 validation and verification standard for programmes of activities

2.3.1. Summary of public comments on Section 3 “Terms and definitions”

30. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.
31. **Comment by ICLRC:** According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para

31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4 mechanism projects and PoAs” not be introduced or be replaced with another term (e.g., “A6.4 projects and PoAs”) to avoid an unjustified limitation of the term “activity”. This is even more important since Para 8(e) of ACP-PoA (A6.4-SB011-A04) uses the term “Article 6, paragraph 4, activity (A6.4 activity),” creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one of the interrelated documents.

2.3.2. Summary of public comments on Section 5 “General validation and verification requirements”

~~32.~~ **Comment by ICLRC:** It needs additional justification that “credibility” of the information may be confirmed by the fact that it “is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence”. The proposed characteristics may not be considered as objective and need to be revised.

33. **Comment by ICLRC:** It is not clear how a DOE would comply with a general requirement to “Safeguard the confidentiality of all information obtained or created during the validation or verification”. Especially given that certain information contained in DOE’s reports (including the validation and verification reports) and public documentation must be made public. This provision is recommended to be revised accordingly.

2.3.3. Summary of public comments on Section 6 “Validation for registration of programmes of activities”

34. **Comment by ICLRC:** According to Para 42 of the RMP, “the host Party shall provide a statement to the Supervisory Body specifying whether it authorizes A6.4ERs issued for the activity for use towards achievement of NDCs and/or for other international mitigation purposes as defined in decision 2/CMA.3. If the host Party authorizes any such uses, the Party may provide relevant information on the authorization, such as any applicable terms and provisions.” The draft documents do not establish any procedure that could be followed by a Party to exercise that right. Therefore, it is recommended that the draft regulation be amended to avoid a possible misinterpretation of the proposed regulation set forth in the draft document with the mentioned rule of the RMP, as well as to avoid a possible limitation of the corresponding rights of a Party. Also, it is important to ensure (by amending the draft document accordingly) that if any such terms and provisions have been provided by a Party, the approved PoAs and CPs comply with those terms and provisions, and that such compliance is confirmed throughout the lifecycle of the PoA/CP.

35. **Comment by ICLRC:** Since the DOE is supposed to consider the “Compliance with the host Party’s indication of activity types that it would approve”, justification of why the DOE is not obliged to consider compliance with other rules of the host Party applicable to the proposed A6.4 PoA is required, or the proposed regulation be amended accordingly.

36. **Comment by ICLRC:** Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.

37. **Comment by ICLRC:** To ensure the PoAs and CPs follow the best practices and consider the most recent developments, the proposed approach is recommended to apply also to the situations when the PoA-related activities are to be implemented after the new methodologies or baselines enter into force.

2.3.4. Summary of public comments on Section 7 “Validation for inclusion of component projects”

38. **Comment by ICLRC:** It is recommended to introduce a clear distinction between the “local stakeholders” and “subnational stakeholders” should there is a justified need in distinguishing those two groups of stakeholders.

2.3.5. Summary of public comments on Section 9 “Verification of implementation and monitoring”

39. **Comment by ICLRC:** Since these days encumbrance of mitigation outcomes is possible not only through programmes, or international, national and subnational GHG mitigation crediting schemes, but through private instruments also (e.g., through the use of blockchain solutions not requiring participation of any independent standards/programme operators or authorities of any level), the possibility of double registration of related activities and double counting of resulting mitigation outcomes through such private instruments is recommended to be considered. To avoid potential double counting, issuance and other negative results of any A6.4 activity, an A6.4 PoA / CP is recommended to have no other registrations, not pursue for registration under, nor be included in a programme under any other international, regional, national, or subnational GHG mitigation crediting scheme.

2.4. Other comments

2.4.1. Summary of comments on A6.4-PROC-AC-001 Procedure: Transition of CDM activities to the Article 6.4 mechanism

40. **Comment by KICC:** KICC seeks to provide input on the approval for transitioning CDM projects. While we acknowledge that this topic might not be the focus in this round of input, given the practical challenges experienced by the project participants on the ground at this current moment, we would like to draw SBM's attention to this matter again. We understand that CPAs of CDM PoA may transition to the Article 6.4 mechanism only in conjunction with the transition of the PoA. And to transit a PoA, according to section 5.3. clause 15 of the transition procedure (a64-sb008-a08_Procedure_Transition of CDM activities to the Article 6.4 mechanism), all host parties of the PoA are required to submit approval if there is more than one host Party for a transitioning CDM PoA. We would like to suggest that the Supervisory Body make an exception to allow the transition of a PoA by obtaining approval only from the parties with the CPAs that are requested to transit, and not from the host parties with CPAs that are not being requested to transit. This is hypothetical but another challenge could happen when a PoA has a large number of host parties. For example, if a PoA has 100 CPAs with 100 host parties, it would be very impractical for a project participant intending to transition only one CPA out of the 100 CPAs to have to obtain approval from all 100 host parties. KICC respectfully requests the Supervisory Body's support in making exceptions to this requirement and providing clear condition for exceptions.

3. Changes made to the regulatory documents for PoAs in response to the stakeholders' comments

41. In response to comments made by stakeholders to enhance and streamline the roles of host Parties in order to enable them to have more robust management and control of the PoAs, the following revisions were made to the regulatory documents for PoAs:
- (a) In the activity cycle procedure, new paragraphs were added, indicating the procedural steps needed to address post-registration changes to the design of the PoA or to corresponding CPs that requires host Party approval, if the change to the design of the PoA or to corresponding CPs results in expected cumulative annual amount of GHG emission reductions or net GHG removals expected to be achieved to be higher than the maximum annual amount of GHG emission reductions or net GHG removals approved by the host Party;
 - (b) In the activity standard, paragraphs 128, 133 and 134 were redrafted to clarify that host Party approval is needed for any post-registration changes to the PoA and included CPs that result in cumulative annual amount of GHG emission reductions or net GHG removals expected to be achieved to be higher than the maximum annual amount of GHG emission reductions or net GHG removals approved by the host Party;
 - (c) In the validation and verification standard, new paragraph 197 was added along to indicate that any change that may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA through the inclusion and implementation of CPs is clearly indicated in the revised PoA-DD;
 - (d) In the validation and verification standard, additional text was added in paragraph 198(g) that the DOE shall assess and confirm that the change does not result in an increase in the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA, otherwise the DOE shall request the activity participants proceed first with post-registration change to the registered PoA-DD to reflect the change of increasing the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA in which the CP is included.
42. In addition, in response to comments from stakeholders on issuance, changes were also made in the monitoring, verification and request for issuance sections of the activity standard and of the validation and verification standard as follows:
- (a) In the activity standard, new text was added to paragraph 159 to clarify that activity participants shall ensure that the sum of the amount of GHG emission reductions or net GHG removals requested for issuance and the cumulative amount of GHG emission reductions or net GHG removals issued for the PoA are up to the maximum annual amount of GHG emission reductions or net GHG removals approved by the host Party, otherwise a post-registration change of the PoA shall be approved by the host Party and the Supervisory Body;
 - (b) In the validation and verification standard, a new text was added in paragraphs 259 (a)(viii) and 265 (c) requesting the DOE to confirm that the implementation of the project is in compliance with the maximum annual amount of GHG emission

reductions or net GHG removals approved to be achieved by CPs that may be included in the PoA during its lifetime as an A6.4 PoA under the Article 6.4 mechanism;

43. Apart from the changes in response to the stakeholder's comments, further changes were made to align the regulatory documents for PoAs with the respective provisions of the adopted "Procedure: Appeal and grievance processes under the Article 6.4 mechanism" and to further improve the consistency of the regulatory documents along with editorial changes.

DRAFT

Appendix. Detailed comments and proposals submitted by stakeholders

Table 1. Detailed comments and proposals by stakeholders on the ACP-PoA

Comment	Submitter	ACP Para	Proposed Revision by stakeholders
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs).</p> <p>Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.</p>	ICLRC	6(d)	<p>6(d) “A6.4 PoA participant” is a public or private entity that participates in an A6.4 PoA.</p>
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs).</p> <p>Therefore, it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4</p>	ICLRC	6(e)	<p>6(e) “Methodology” is, unless otherwise specified, a mechanism methodology referred to in the RMPs, as approved by the Supervisory Body, to set a baseline for the calculation of emission reductions to be achieved by Article 6.4 mechanism projects and PoAs (hereinafter collectively referred to as A6.4 projects and PoAs), to demonstrate the additionality of A6.4 projects and PoAs, to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by A6.4 projects and PoAs.</p>

Comment	Submitter	ACP Para	Proposed Revision by stakeholders
<p>mechanism projects and PoAs" not be introduced or be replaced with another term (e.g., "A6.4 projects and PoAs") to avoid an unjustified limitation of the term "activity". This is even more important since Para 8(e) of the draft document uses the term "Article 6, paragraph 4, activity (A6.4 activity)," creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one document</p>			
<p>Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.</p>	<p>ICLRC</p>	<p>13(h), 22(d), 23, 94, 96, 116, 134(c), 174</p>	<p><u>By way of an example (a non-exhaustive list):</u></p> <p>13(h) The indicative maximum annual amount of GHG emission reductions or net GHG removals, as well as the indicative maximum total amount of GHG emission reductions or net GHG removals, expected to be achieved by CPs that may be included in the PoA during its lifetime as an A6.4 PoA under the Article 6.4 mechanism.</p> <p>22(d) The maximum annual amount of GHG emission reductions or net GHG removals and the maximum total amount of GHG emission reductions or net GHG removals approved to be achieved by CPs that may be included in the PoA during its lifetime as an A6.4 PoA under the Article 6.4 mechanism;</p> <p>23. If the PoA covers more than one host Party, the approval referred to in paragraph 22 above shall be provided by each of the host Parties, including by indicating the maximum annual amount of GHG emission reductions or net GHG removals, as well as the maximum total amount of GHG emission reductions or net GHG removals expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA.</p> <p>94. If the DOE or activity participants identify that the sum of the estimated annual amount of GHG emission reductions or net GHG removals expected to be achieved by the CP proposed for inclusion and the cumulative annual amount of GHG</p>

Comment	Submitter	ACP Para	Proposed Revision by stakeholders
			emission reductions or net GHG removals expected to be achieved by all CPs that have been already included in the PoA is higher than the maximum annual amount of GHG emission reductions or net GHG removals or of the maximum total amount of GHG emission reductions or net GHG removals approved by the host Party under paragraph 22(d) above, the CP shall not be included in the PoA unless a post-registration change to the PoA, as per paragraph 114(a)(iii) below, to increase the annual amount of GHG emission reductions or net GHG removals and the maximum total amount of GHG emission reductions or net GHG removals expected be achieved by the CPs to be included, is approved by the Supervisory Body.
When it comes to the submission of a request for issuance of A6.4ERs, the processing of the uploaded documents should also be automatically stopped if the total number of A6.4ERs requested for issuance under that PoA/CP exceeds the maximum total amount approved by the host Party	ICLRC	181	181. Once the documents referred to in paragraph 176 above are uploaded, the secretariat shall through the dedicated interface on the UNFCCC website, automatically check whether the amount of ERs included in the request for issuance will result in the total amount of GHG emission reductions or net removals for the registered PoA being within the maximum annual amount that have been approved by the host Party under paragraph 22(d) above. If the total annual amount exceeds the maximum annual amount, or the total amount exceeds the maximum total amount exceeds the maximum total amount , approved by the host Party, the dedicated interface shall automatically block the processing of the uploaded documents, otherwise, the secretariat shall issue a statement of the issuance fee due (or confirmation that no issuance fee is due), determined in accordance with the
While the Local Stakeholder Consultation is mentioned in the Standard, it is not in the Procedure.	MECS	No para	Include requirements for the local stakeholder consultation prior to the global stakeholder consultation. This inclusion is important to suggest that the local/subnational/national stakeholder consultation is a critical activity prior to the global stakeholder consultation.
KICC understands that Supervisory Body has placed a placeholder for possible provisions on the submission of the statement of authorization on the use of A6.4ERs.	KICC	24	We propose including a detailed guideline that clarifies the timeline for authorization, the possibility of changing the authorization of use, and the implications or practical steps to follow upon such a change including providing a form to approve/effect changing the authorization of use.

Comment	Submitter	ACP Para	Proposed Revision by stakeholders
KICC believes that the secretariat should carefully review the appropriateness of withdrawal notifications by host parties based on stringent rules and conditions	KICC	274-276	To prevent unreasonable revocation of authorization and approval, KICC strongly support that the secretariat has the authority to deny the withdrawal of authorization/approval by the host parties
Host country approval – timeline for submission is provided. However, timeline for approval not provided	GC	21	No proposed changes in the text, however request is to include number of days for host country approval.
Finalizing the request for registration if no request for review – If the host country approval is not obtained, how can supervisory body approve for the registration of the project. What will happen to NDCs and ITMOs when the project moves ahead and if the entity wants to attach the CERs to the country's NDCs. and if it has to exchange	GC	62	It is mandatory for the review from the host country and there is clause in other registries which enables entities to pre-review form prior to registration. Add the text: the participating party has to submit a pre-review at the time of registration
Reported issues resulting from insolvency and/or disputes on modalities of communication – During any time of the project the Secretariat should deem the project void and closed, if the disputes are not resolved and there are still gaps in the modalities and procedure including the Article 6.4 credits availing	GC	155-158	The project under Article 6.4 shall be deemed to be declared null and void with closure if the issues are not reported on insolvency within 30 days from the communication from the Secretariat.
The duration timeline provided for withdrawal not mentioned	GC	229	Upon receipt of the request for withdrawal of a request for issuance, the secretariat shall check the information provided as soon as possible and, if the request is complete, reimburse the issuance fee if applicable in accordance with Appendix 1 and update the information on the activity view page of the relevant registered A6.4 PoA on the UNFCCC website within 28 days.

Table 2. Detailed comments and proposals by stakeholders on the AS-PoA

Comment	Submitter	AS Para	Proposed Revision by stakeholders
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion</p>	ICLRC	6(d)	6(d) “A6.4 PoA participant” is a public or private entity that participates in an A6.4 PoA .
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). This is even more important since Para 8(e) of ACP-PoA (A6.4-SB011-A04) uses the term “Article 6, paragraph 4, activity (A6.4 activity),” creating further reasons for confusion or misinterpretation, as the same term is used with different meanings within one of the interrelated documents.</p> <p>Therefore, it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4 mechanism projects and PoAs” not be introduced or be replaced with another term</p>	ICLRC	6(e)	6(e) “Methodology” is, unless otherwise specified, a mechanism methodology referred to in the RMPs, as approved by the Supervisory Body, to set a baseline for the calculation of emission reductions to be achieved by Article 6.4 mechanism projects and PoAs (hereinafter collectively referred to as A6.4 projects and PoAs), to demonstrate the additionality of A6.4 projects and PoAs, to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by A6.4 projects and PoAs

Comment	Submitter	AS Para	Proposed Revision by stakeholders
(e.g., "A6.4 projects and PoAs") to avoid an unjustified limitation of the term "activity"			
<p>Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.</p>	ICLRC	12(g), 125(e), 127, 129(g), 132(a)(ii)	<p>12(g) Indicative maximum annual amount of GHG emission reductions or net GHG removals, as well as indicative maximum annual amount of GHG emission reductions or net GHG removals, expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA.</p> <p>125(e) Any change of programme design that may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals or maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA, subject to the approval of the host Party;</p> <p>127. The host Party shall approve the change to a registered A6.4 PoA in accordance with the requirement in the activity cycle procedure for any change in the programme design that may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals or maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA as per paragraph 125(e) above.</p> <p>129(g) The maximum annual amount of GHG emission reductions or net GHG removals and the maximum annual amount of GHG emission reductions or net GHG removals expected to be achieved by CPs implemented in each of the host Parties that may be included in the PoA.</p> <p>132(a)(ii) Increasing the capacity would result in the increase of GHG emission reductions or net GHG removals more than the respective thresholds referred to in subparagraph (i) above, provided that such increase would not lead to exceeding the maximum annual GHG emission reductions or net GHG removals or the maximum annual amount of GHG emission reductions or net GHG removals for the PoA as indicated in the PoA-DD in accordance with paragraph 12(g) above and approved by the host Party in accordance with the activity cycle procedure;</p>

<p>To avoid potential double counting, issuance and other negative results of any A6.4 activity, an A6.4 PoA /CP is recommended to have no other registrations, not pursue for registration under, nor be included in a programme under any other international, regional, national, or subnational GHG mitigation crediting scheme. Also, since these days the registration of mitigation activities, as well as issuance (and encumbrance) of resulting mitigation outcomes is possible not only through programmes, or international, national and subnational GHG mitigation crediting schemes, but through private instruments also (e.g., through the use of blockchain solutions not requiring participation of any independent standards/programme operators or authorities of any level), it is recommended that such “other initiatives” be included in the draft documents alongside other programmes, as well as any other international, regional, national, subnational or sector wide GHG mitigation crediting schemes.</p>	<p>ICLRC</p>	<p>Sections 6.3, 6.11 7.1, 7.2, 9.3, et al</p>	<p>By way of an example (a non-exhaustive list):</p> <p>15. The activity participants shall additionally confirm that the one of the following:</p> <p>(a) The proposed A6.4 PoA is not currently registered or being pursued for registration, or covered by a programme, under any other international, regional, national, subnational or sector-wide GHG mitigation crediting scheme or other similar initiatives;</p> <p>(b) The proposed A6.4 PoA was previously registered under or covered by a programme under another international, regional, national, or subnational or sector-wide GHG mitigation crediting scheme but deregistered or excluded from the other crediting scheme before fully consuming the PoA period under the other crediting scheme; or</p> <p>(c) The proposed A6.4 PoA is currently registered or covered by another international, regional, national, subnational or sector-wide GHG mitigation crediting scheme.</p> <p>16. For the cases referred to in paragraph 15(b) above, the activity participants shall obtain a confirmation of the other crediting scheme of the effective date of deregistration or exclusion from the other crediting scheme and remaining crediting period under the other crediting scheme at the time of deregistration or exclusion.</p> <p>17. For the cases referred to in paragraph 15(c) above, the activity participants shall obtain a confirmation of the other crediting scheme of the effective date of the registration or coverage, the start and end dates of the PoA period, and the monitoring periods for which credits have been issued under the other crediting scheme.</p> <p>63(d) Conditions to determine whether the CP is or was one of the following:</p> <p>(i) Nnot currently registered or being pursued for registration, or covered by a programme, under any other international, regional, national, subnational or sector-wide GHG mitigation crediting scheme or other similar initiative.</p> <p>(ii) Previously registered under or covered by a programme under any other international, regional, national, or subnational or sector-wide GHG mitigation</p>
--	--------------	--	--

Comment	Submitter	AS Para	Proposed Revision by stakeholders
			<p>crediting scheme but deregistered or excluded from the other crediting scheme before fully consuming the crediting period under the other crediting scheme; or</p> <p>(iii) Currently registered or covered by a programme under any other international, regional, national, subnational or sector-wide GHG mitigation crediting scheme.</p> <p>69. The activity participants shall declare, if applicable, the existence of a registered A6.4 project or a CP under a registered A6.4 PoA or an activity under any other international, regional, national or subnational GHG mitigation crediting scheme or other similar initiative whose crediting period has or has not expired (hereinafter referred to as former project) in the same geographical location as that of the CP</p>
<p>Local stakeholder consultation is expected to be carried out before either the project start date or the submission of the design document to the DoE, whichever is earlier.</p>	<p>MECS</p>	<p>109, Annex 2</p>	<p>Analysis of the Local Stakeholder Consultation Reports of different standards show that not all expected and required information are shared, for example, the amount of credits generated, prices and revenues, which are information requested and sought by the local stakeholders.</p> <p>This is either because the PDD is not finalised, and details are not as yet ready and/or the tools and standards do not spell out specific requirements in these contexts.</p> <p>Therefore, the standards should guide such that the local stakeholder consultation are carried out specifically after the PDD is finalised when all the information are ready to be shared. Further, the tool and standard should clearly specify the information that needs to be shared during local stakeholder consultation.</p> <p>Note:</p> <p>These proposed changes are also related to the Free, Prior and Informed Consent (FPIC) and how and what information are shared during the FPICs.</p>

Table 3. Detailed comments and proposals by stakeholders on the VVS-PoA

Comment	Submitter	VVS Para	Proposed Revision by stakeholders
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs). Therefore, it is recommended that the term “Activity participant” in the meaning of “programme of activities participant” be replaced with another term (e.g., “A6.4 PoA participant”) to avoid an unjustified limitation of the term “activity” definition, and any possible confusion.</p>	ICLRC	6(d)	6(d) “A6.4 PoA participant” is a public or private entity that participates in an A6.4 PoA .
<p>According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP (e.g., by limiting its meaning only to projects and PoAs).</p> <p>Therefore it is recommended that the term “A6.4 activities” in the meaning of “Article 6.4 mechanism projects and PoAs” not be introduced or be replaced with another term (e.g., “A6.4 projects and PoAs”) to avoid an unjustified limitation of the term “activity”. This is even more important since Para 8(e) of ACP-PoA (A6.4-SB011-A04) uses the term “Article 6, paragraph 4, activity (A6.4 activity),” creating further reasons for confusion or</p>	ICLRC	6(e)	6(e) “Methodology” is, unless otherwise specified, a mechanism methodology referred to in the RMPs, as approved by the Supervisory Body, to set a baseline for the calculation of emission reductions to be achieved by Article 6.4 mechanism projects and PoAs (hereinafter collectively referred to as A6.4 projects and PoAs), to demonstrate the additionality of A6.4 projects and PoAs , to ensure accurate monitoring of GHG emission reductions or net GHG removals, and to calculate GHG emission reductions or net GHG removals achieved by A6.4 projects and PoAs .

Comment	Submitter	VVS Para	Proposed Revision by stakeholders
<p>misinterpretation, as the same term is used with different meanings within one of the interrelated documents.</p>			
<p>It needs additional justification that “credibility” of the information may be confirmed by the fact that it “is able to inspire belief or trust, and the willingness of persons to accept the quality of evidence”.</p> <p>The proposed characteristics may not be considered as objective and need to be revised.</p>	ICLRC	14(e), footnote 6	<p>6 Information is credible if it is authentic and is proved by the facts, established practice, or documented evidences 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.</p>
<p>Given the importance of the total number of A6.4ERs that may be issued under a registered PoA / CP for a Party (and in particular, for the host Party), not only annual maximum amounts are recommended to be specified by a host Party in its approval, but also the maximum total amount of GHG emission reductions or net GHG removals approved by the Party for those CPs.</p>	ICLRC	110(c), 188(d), 192, 198	<p><u>By way of an example (a non-exhaustive list):</u></p> <p>35(g) Whether the A6.4 PoA stipulates the indicative maximum annual amount of GHG emission reductions or net GHG removals, as well as the indicative maximum total amount of GHG emission reductions or net GHG removals, expected to be achieved by CPs that may be included in the PoA for each host Party of the PoA.</p> <p>110(c) A confirmation of the maximum annual amount of GHG emission reductions or net GHG removals and the maximum total amount of GHG emission reductions or net GHG removals that may be achieved by the proposed A6.4 PoA;</p> <p>188(d) To change the design of the PoA such that it may result in an increase in the maximum annual amount of GHG emission reductions or net GHG removals or in the maximum total amount of GHG emission reductions or net GHG removals expected to be achieved by the PoA in each of the host Parties through the inclusion and implementation of CPs, subject to the approval of the host Party;</p> <p>192. If the registered A6.4 PoA has been amended to change the design of the PoA such that it may result in an increase of the maximum annual amount of GHG emission reductions or net GHG removals or the maximum total amount of GHG emission reductions or net GHG removals expected to be achieved</p>

Comment	Submitter	VVS Para	Proposed Revision by stakeholders
<p>To ensure the PoAs and CPs follow the best practices and consider the most recent developments, the proposed approach is recommended to apply also to the situations when the PoA-related activities are to be implemented after the new methodologies or baselines enter into force.</p>	<p>ICLRC</p>	<p>77, 78</p>	<p>by the PoA through the inclusion and implementation of CPs, the DOE shall assess and confirm that:</p> <p>77. If the generic CP applies a previous versions of a methodology or a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted, or the activities under the proposed A6.4 PoA or CP are likely to occur, after the grace period for applying the previous version in accordance with the validity section of the “Procedure: Development, revision and clarification of methodologies and methodological tools”, the DOE shall request the activity participants to provide a revised PoA-DD, applying the latest version of the mechanism methodology or other applicable and valid mechanism methodology, or the standardized baseline in accordance with the activity standard.</p> <p>78. If the generic CP does not apply a standardized baseline but the request for registration of the proposed A6.4 PoA is likely to be submitted, or the activities under the proposed A6.4 PoA or CP are likely to occur, after an applicable approved standardized baseline whose selection is mandatory has become valid and after the grace period for not applying the standardized baseline in accordance with the validity section of the “Procedure: Development, revision, clarification and update of standardized baselines”, the DOE shall request the activity participants to provide a revised PoA-DD, applying the standardized baseline in accordance with the activity standard.</p>
<p>Since these days encumbrance of mitigation outcomes is possible not only through programmes, or international, national and subnational GHG mitigation crediting schemes, but through private instruments also (e.g., through the use of blockchain solutions not requiring participation of any independent standards/programme operators or authorities of any level), the possibility of double registration of related activities and double counting of resulting mitigation outcomes</p>	<p>ICLRC</p>	<p>260, 261, et al</p>	<p><u>By way of an example (a non-exhaustive list):</u></p> <p>260. The DOE shall determine whether the registered A6.4 PoA or any of the included CPs are also registered, or covered by a programme, under any other international, regional, national or subnational or sector-wide GHG mitigation crediting scheme, or other similar initiatives prior to the request for issuance based on the confirmation from such other crediting scheme, if applicable, public information and any other information obtained from the activity participants.</p> <p>261. If the DOE determines that the registered A6.4 PoA or any of the included CPs are registered, or covered by a programme, under another crediting scheme or other similar initiatives, the DOE shall consider it as incompliance with the requirements set forth in Paragraph 258 above. additionally determine</p>

Comment	Submitter	VVS Para	Proposed Revision by stakeholders
<p>through such private instruments is recommended to be considered.</p> <p>To avoid potential double counting, issuance and other negative results of any A6.4 activity, an A6.4 PoA / CP is recommended to have no other registrations, not pursue for registration under, nor be included in a programme under any other international, regional, national, or subnational GHG mitigation crediting scheme.</p>			<p>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</p>

DRAFT

Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
01.0	1 July 2024	<p>Published as an annex to the annotated agenda of SBM 013. Note: The three documents referenced in this document are published separately under the following symbol numbers:</p> <ul style="list-style-type: none"> • A6.4-SBM013-AA-A07: Draft Procedure: Article 6.4 activity cycle procedure for programmes of activities • A6.4-SBM013-AA-A08: Draft Standard: Article 6.4 activity standard for programmes of activities. • A6.4-SBM013-AA-A09: Draft Standard: Article 6.4 mechanism validation and verification standard for programmes of activities.

Decision Class: Regulatory

Document Type: Information note

Business Function: A6.4 activity cycle

Keywords: A6.4 mechanism, call for inputs, data collection and analysis, programmes of activities

Related documents:

2 May 2024	<p>A6.4-SB011-A04 - <i>Draft procedure</i>: Article 6.4 activity cycle procedure for programmes of activities (v 02.0)</p> <p>A6.4-SB011-A05 - <i>Draft standard</i>: Article 6.4 activity standard for programmes of activities (v02.0)</p> <p>A6.4-SB011-A06 - <i>Draft standard</i>: Article 6.4 validation and verification standard for programmes of activities (v02.0)</p>
15 April 2024	<p>A6.4-SB011-AA-A07 - <i>Concept note</i>: Development of activity standard, validation and verification standard, and activity cycle procedure for programmes of activities (v01.0).</p> <p>A6.4-SB011-AA-A08 - <i>Draft procedure</i>: Article 6.4 activity cycle procedure for programmes of activities (v01.0)</p> <p>A6.4-SB011-AA-A09 - <i>Draft standard</i>: Article 6.4 activity standard for programmes of activities (v01.0)</p> <p>A6.4-SB011-AA-A10 - <i>Draft standard</i>: Article 6.4 validation and verification standard for programmes of activities (v01.0)</p>