We are pleased to provide the views of WWF on the matters referred to Paragraph 9 of FCCC/PA/CMA/2022/L.14:

9. Also requests the Subsidiary Body for Scientific and Technological Advice to continue its consideration of, and to develop, on the basis of the rules, modalities and procedures for the mechanism and elaboration thereon, recommendations for consideration and adoption by the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement at its fifth session (November–December 2023) on:

(a) Consideration of whether Article 6, paragraph 4, activities could include emission avoidance and conservation enhancement activities;

(b) Connection of the mechanism registry to the international registry as per paragraph 63 of the rules, modalities and procedures for the mechanism, as well as to other registries referred to in decision 2/CMA.3, annex, paragraph 29, if applicable, including the nature and extent of interoperable features;

(c) Provision of a statement by the host Party to the Supervisory Body specifying whether it authorizes Article 6, paragraph 4, emission reductions issued for an Article 6, paragraph 4, activity for use towards achievement of nationally determined contributions and/or for other international mitigation purposes, as defined in decision 2/CMA.3, in accordance with paragraph 42 of the rules, modalities and procedures, including its timing, relevant information on the authorization and any revisions.

In regards to Paragraph 9 (a), on whether Article 6, paragraph 4, activities could include emission avoidance and conservation enhancement activities, WWF considers that:

- Relevant activities can already be included under the existing framework, including under Article 6.8 for results-based financing without the transfer of ITMOs;
- Consideration of additional provisions will entail the risk of approval of activities for which demonstration of additionality and other elements to ensure environmental integrity pose inherent difficulties;
- Thus, no further provisions are necessary in relation to emissions avoidance and conservation enhancement activities.

In regards to Paragraph 9 (b), on the question of registries, WWF considers that:

- The Article 6.4 Registry should set a high standard for transparency and provide comprehensive information to all stakeholders on all registered projects (nature of activity, climate and other benefits, methodology, host country, additionality, permanence, etc.), and include all transactions of units, buyers, sellers, cancellation, prices, etc.
In regards to Paragraph 9(c), on the statement by the host Party authorizing Art 6.4 ERs towards use towards achievement of NDCs or for other international mitigation purposes (OIMP), and recalling Para 29(b) which states: "A6.4ERs not specified as authorized for use towards achievement of NDCs and/or for other international mitigation purposes (mitigation contribution A6.4ERs), which may be used, inter alia, for results-based climate finance, domestic mitigation pricing schemes, or domestic price-based measures, for the purpose of contributing to the reduction of emission levels in the host Party", WWF considers that:

- “Mitigation contribution A6.4ERs” (Article 6.4 ERs not authorized for use towards achievement of NDCs or OIMP) will not be subject to corresponding adjustments by the host country, and thus any use in compliance markets or in voluntary markets for offsetting purposes would result in double claiming of the emissions reduction - by both the buyer and the host country;

- Thus these emissions reductions must not be used in either compliance or voluntary markets for offsetting purposes or as the basis of claims of carbon neutrality or net zero for products, activities or organizations.

For more information contact

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