

Guide 3:

HOW CAN I USE DATA FROM ARTICLE 6.4 TO UNDERSTAND WHAT'S HAPPENING IN MY COUNTRY?



**What is Article 6.4:
key terms, processes,
and reports?**

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WHY THESE GUIDES?

Carbon projects under Article 6 are poised to rapidly increase. There are over 110 bilateral agreements between countries for Article 6.2 and over 2,000 proposed projects awaiting approval under Article 6.4.¹ But the transparency and pathways for accountability are not keeping pace in a manner that ensures integrity amid the rapid expansion. If you live in a country where a carbon project is taking place, it can be hard to find information about the project, who is involved, and what to expect. Even when information is available publicly, it is often organised in a manner to serve industry stakeholders with complex jargon.

We created this series of guides to help civil society organisations and the public respond to the expansion of Article 6 projects. We hope to make it easier to find information, analyse it, and consider how to foster accountability. This series was created by asking journalists and civil society actors from carbon rich countries the questions they have about Article 6 and the data they find most difficult to parse. We then combed through the first round of Article 6 reports and project documents to understand what information is most often available in which reports. Bolstered by practical examples, we created pathways from the frontline questions to the information disclosed.

These guides can be read separately or sequentially. Guide 1 provides detailed definitions and framing that may be useful throughout the other guides.

GUIDE 1: How to find information on carbon projects in my country? *If you are new to carbon projects and are trying to understand what is happening in your country or your community, this is where to start. You will learn about the key terms and processes for carbon projects, how to locate information about the big picture in your country, and how to look for a specific carbon project that might be near you.*

GUIDE 2: How can I use data from Article 6.2 to better understand what's happening in my country? *If your country is engaged in transfers under Article 6.2, this guide will help you find out more about what is happening. You will learn how to understand the different types of reporting under 6.2, where to find key project information, and what paths for accountability might exist.*

GUIDE 3: How can I use data from Article 6.4 to better understand what's happening in my country? *If there are carbon projects in your country that are being registered under Article 6.4's Paris Agreement Crediting Mechanism, this guide will help you know where to look for more information about the projects in your country. The guide will describe the PACM processes and the different types of documents available during the processes.*

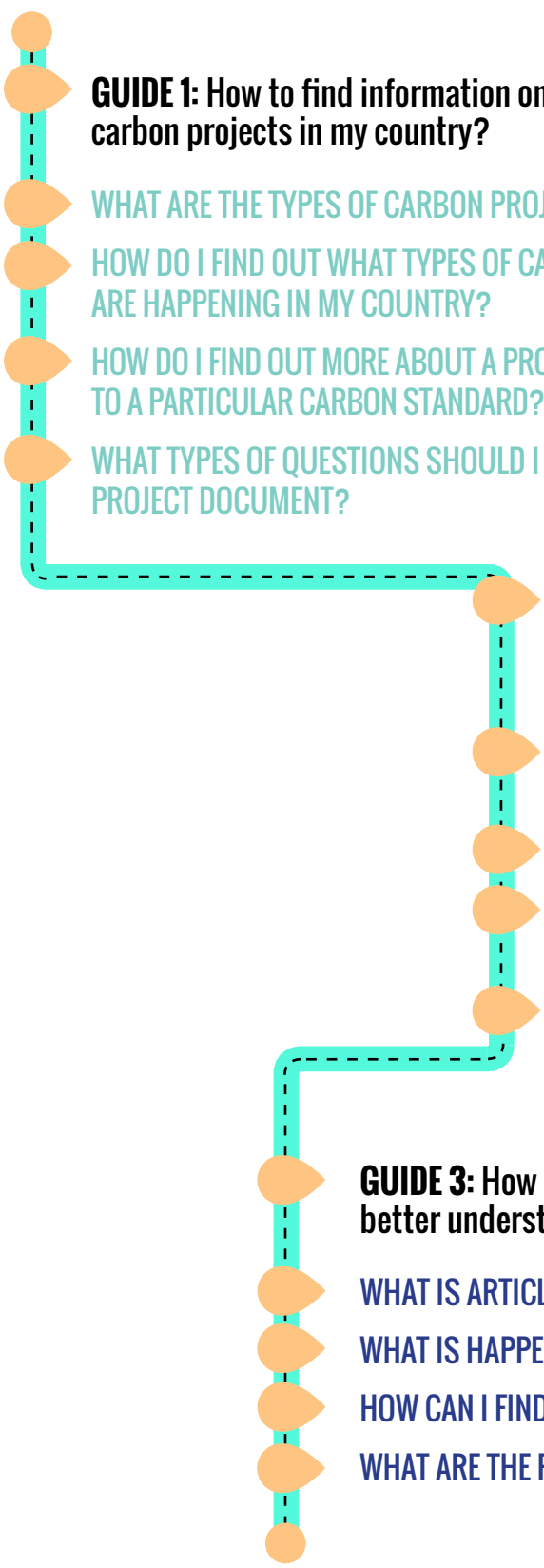


All images with this icon on the right lower corner are screenshots from the platform discussed in that section.



All yellow background parts of pages with this icon at the top are worksheets meant to assist with info collection.

PATHWAYS TO ARTICLE 6 DATA



GUIDE 1: How to find information on carbon projects in my country?

WHAT ARE THE TYPES OF CARBON PROJECTS?

HOW DO I FIND OUT WHAT TYPES OF CARBON PROJECTS ARE HAPPENING IN MY COUNTRY?

HOW DO I FIND OUT MORE ABOUT A PROJECT REGISTERED TO A PARTICULAR CARBON STANDARD?

WHAT TYPES OF QUESTIONS SHOULD I ASK WHEN I FIND MY PROJECT DOCUMENT?

GUIDE 2: How can I use data from Article 6.2 to better understand what's happening in my country?

WHAT IS ARTICLE 6.2: KEY TERMS, PROCESSES, AND REPORTS?

WHAT IS HAPPENING IN MY COUNTRY (BIG PICTURE)?

HOW CAN I FIND OUT A SPECIFIC 6.2 PROJECT IN MY COUNTRY?

WHAT ARE THE PATHS FOR ACCOUNTABILITY?

GUIDE 3: How can I use data from Article 6.4 to better understand what's happening in my country?

WHAT IS ARTICLE 6.4: KEY TERMS, PROCESSES, AND REPORTS?

WHAT IS HAPPENING IN MY COUNTRY (BIG PICTURE)?

HOW CAN I FIND OUT A SPECIFIC 6.4 PROJECT IN MY COUNTRY?

WHAT ARE THE PATHS FOR ACCOUNTABILITY?

WHAT IS ARTICLE 6.4: KEY TERMS, PROCESSES, AND REPORTS?

START HERE



The purpose of this guide is to help people living in countries with Article 6.4 projects to better understand how to find and analyse information about those projects. The guide begins by providing an overview of Article 6.4. It goes on to show how one can find information about what is happening across your country regarding Article 6.4 and understand how you can look for information about what is happening for specific projects. Our intention is to help you find official data that you can use for your advocacy and to foster accountability for better climate and social outcomes in your own country.

Article 6.4 is a different way of fostering cooperation from Article 6.2. Article 6.4 creates a centralised crediting mechanism overseen by the UNFCCC Article 6.4 Supervisory Body called the Paris Agreement Crediting Mechanism (PACM). The Supervisory Body and the PACM create rules for what projects must show to be registered and able to issue credits under Article 6.4. Once credits are issued by the PACM, the host countries may **authorise** credits to be used for ITMOs or the credits can be sold as **mitigation contribution units**, but not used towards NDCs. One way to understand Article 6.4 is to think of it as a voluntary carbon standard with rules and procedures created by the countries involved in the Paris Agreement.

PEOPLE IN CHARGE OF ARTICLE 6.4

There are a lot of different groups of people making decisions about the rules and projects under Article 6.4. It can be confusing to understand their roles. This chart provides a quick summary of roles.

FULL NAME	ACRONYM OR SHORTHAND	ROLE IN ARTICLE 6.4
Conference of the Parties	COP	Annual meeting of the countries that participate in the Paris Agreement, provides broad political leadership of the implementation of the Paris Agreement.
Conference of the Parties serving as the meeting of the Parties to the Paris Agreement	CMA	- Group of countries meeting during the COP that provides supervision and guidance to the Supervisory Body; - They receive reports and recommendations from the Supervisory Body and adopt rules, modalities, and procedures; - No project-specific oversight.
Article 6.4 Supervisory Body	SBM	- Develops rules, standards, and procedures; - Approves methodologies and accredits validation/verification bodies (DOEs); - Registers 6.4 activities and oversees issuances (individual project approval); - Manages the PACM and reports to the CMA.
UNFCCC Secretariat/ PACM Secretariat	Secretariat	- Supports the Supervisory Body and CMA administratively and technically; - Operates systems and platforms for submission, registration, and communication; - Supports accreditation and review process.
Host Country/ Designated National Authority	DNA	- Approves that projects are in line with NDC and sustainable development goals; - Can provide comment on projects during registration; - Can provide authorization and corresponding adjustment.

CYCLE OF CARBON PROJECTS UNDER ARTICLE 6.4

This section outlines the steps in a PACM project for developers, host countries, the Supervisory Body, and the UNFCCC Secretariat. Figure 1 on [page 09](#) shows how the PACM process compares with projects in the Voluntary Carbon Market. Throughout this section, we will highlight opportunities for input or oversight in the process.

The first step for a country to host Article 6.4 projects is to submit a Host Party Participation Form declaring which government body will be its Designated National Authority (DNA) for Article 6 projects.² The participation form must explain how each country will approve and authorise projects.

When a project developer is interested in starting a project in a country with a DNA, it must submit a **prior consideration notification** with basic information about the project.³ This part of the project cycle is sometimes called pre-registration. The Secretariat will send a notification to the host country about the project. The host country can send a non-objection letter, confirming that the project is in line with national priorities.⁴ The Secretariat reviews the notification for completeness, assigns a project reference number, and publishes the notification on the UNFCCC website.⁵

Once a project's prior consideration notification is published, the project developer has one year to submit a **project design document** (PDD).⁶ As part of developing the PDD, the project developer must hold local stakeholder consultations, and if there are Indigenous Peoples impacted by the project, conduct Free Prior Informed Consent. The PDD will also include a collection of forms assessing the social and environmental risks called the Sustainable Development Tool.

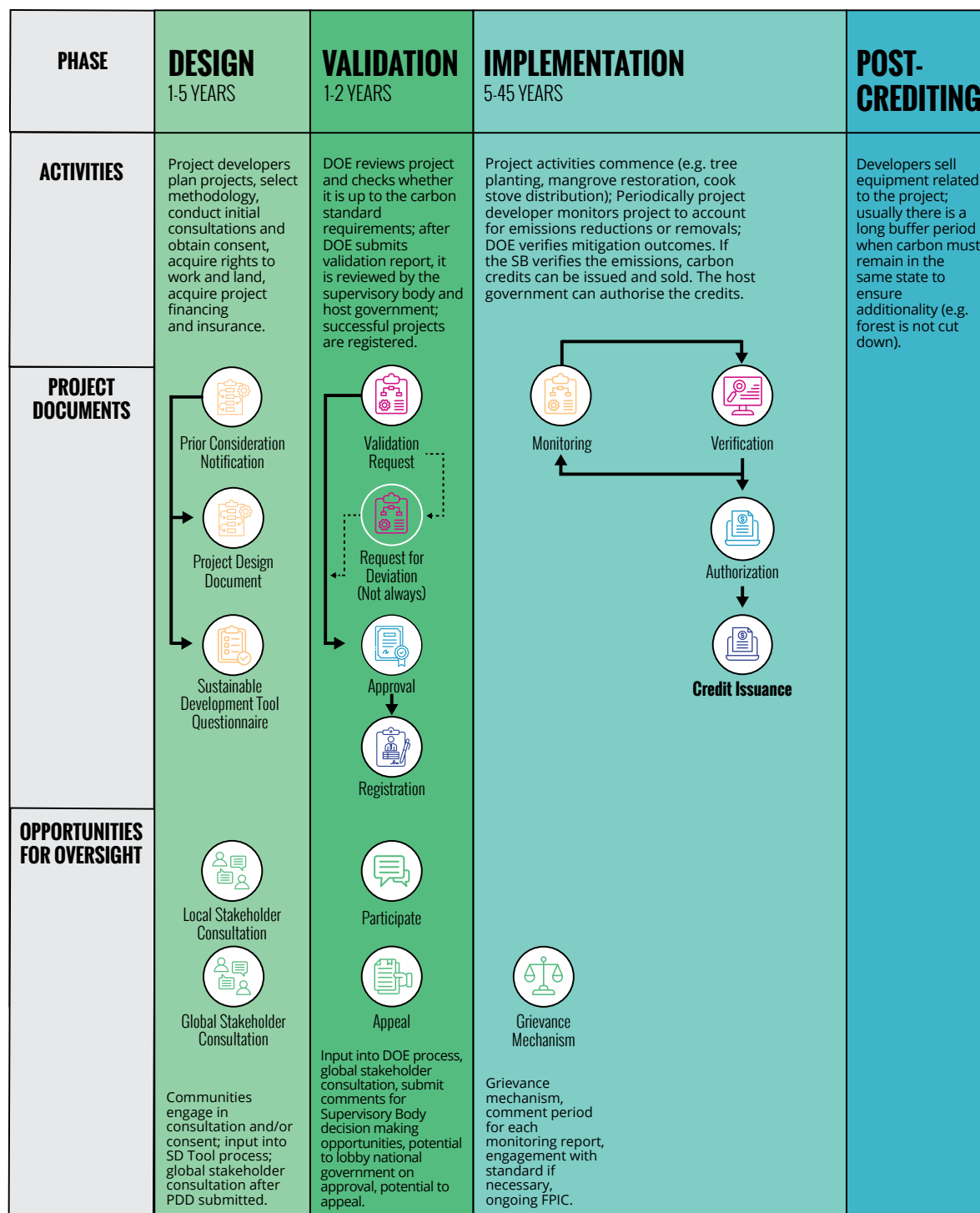
When the PDD is submitted, there is a 28-day **commenting period**, called [global stakeholder consultation](#), open to parties, stakeholders, and UNFCCC observers.⁷ The project developer may be requested by the Supervisory Body to submit a revised PDD based on stakeholder feedback.

After the public comment period, the host party usually has 60 days to **approve** the project.⁸ If the host Party decides to approve the project, the approval must provide information about how the project complies with the country's NDC and sustainable development goals.⁹ While there is not a formal consultation opportunity, local stakeholders could engage with the designated national authority if they have questions or concerns during this review period.

The project proponent then submits their project to a designated operational entity (DOE) for **validation**. The DOE acts like a validation and verification body in a voluntary project; they will check whether the project meets all the rules and guidelines, including verifying the methodology and the Sustainable Development Tool. The DOE will write a validation report either recommending the project or outlining gaps. If there is a gap within the SD tool requirements, the DOE may request a **deviation** from the SD tool from the Supervisory Body. Notice of the deviation request will be made publicly available and the decision will be considered at a Supervisory Body meeting.¹⁰

ARTICLE 6.4 CARBON PROJECT LIFECYCLE

Figure 1



KEY/ACTORS



Project Developer



DOE



Supervisory Body



Rightsholder



Host Government

Assuming a project meets all the requirements or a deviation is granted, the DOE can submit a request for **registration**. The Secretariat will conduct a completeness and substantive check, and then publish the request and accompanying project documentation on its website. After the request is published, the host country, any participating Party, or Supervisory Body member have 28 days to request a review of the registration. When the registration is finalised, eligible stakeholders have another 28 days to appeal the registration through the appeals process.

Once a project is registered, the project developer starts conducting the project activities that will result in emissions reductions or removals. After some time, when the project developer wants to get recognition for the mitigation outcomes - the emissions reductions or removals - it starts the **issuance** process. The developer begins by drafting a monitoring report that shows the emissions reductions or removals to a DOE. The DOE reviews the report and the project and makes a recommendation for how many credits should be **issued** in a 'Verification and certification report.'

Before the credits are issued, the host country makes a decision about whether to **authorise** the credits. If credits are **authorised**, it means that the credits become official **Authorised 6.4 Emission Reductions** and can be used for another country's NDCs or other official purpose. Credits that are not authorised can be sold as **mitigation contribution units**. These credits can be purchased by countries or companies, but can not be used for NDCs.

The cycle of issuance and authorisation continues for the entire crediting period of the project. At any point during that time, impacted communities can file a grievance by using a grievance submission form on the UNFCCC website.

AUTHORISATION VERSUS APPROVAL

A host country must **approve** all Article 6.4 projects within their territory before a request for registration can be submitted by the project. Approval means that the project is in line with their NDC plans and it contributes to sustainable development goals.

Authorisation is an optional step based on the host country's plans for how to use different credits towards NDCs or other goals. A project can still move forward if the credits are not authorised.

TRANSFERRING ACTIVITIES FROM THE CLEAN DEVELOPMENT MECHANISM

The Clean Development Mechanism is the old UN carbon crediting mechanism, which will cease its operations in 2027.¹¹ Many CDM projects have faced criticism for overestimating emission reductions and underreporting human rights impacts. Project activities that started under the CDM can be transferred to PACM if they have the approval of the host country and are in compliance with 6.4 requirements. The project participant must have submitted a request for transfer to the PACM Secretariat by December 2025 and host countries have until June 30, 2026 to approve the projects. Approved projects will then go through the same registration process as other PACM projects, with a completeness and substantive check, review period, and decision. CDM projects will need to replace their methodologies with 6.4 approved methodologies to issue units after 2026.

CDM projects that have requested transition can be found [here](#).

REPORTING REQUIREMENTS UNDER ARTICLE 6.4

There are a number of official project documents required under the PACM, even more than what is required under the voluntary carbon market. This list is long, but gives you a sense of what to expect in each document. When available we provide links to the blank forms. You can pair it with the lifecycle overview above to understand when each report will be available.¹²

DOCUMENT NAME	DEFINITION
Prior consideration notification ¹³	Broad information about the intended project to allow for initial approval and notification.
Project design document ¹⁴	Detailed document defining the project scope, location, methodology, and process. Should include assessment from the SD tool.
SD Tool questionnaire ¹⁵	A collection of forms assessing the social and environmental risks of the project including environmental and social safeguards risk assessment form, the A6.4 Environmental and social management plan form, and the A6.4 Sustainable development impact form.
Modalities of communication statement form ¹⁶	Form defining the main points of contact from the project developer for the Supervisory Body.
Global stakeholder consultation form ¹⁷	Form to submit comments on the PDD during global stakeholder consultation (before registration)

DOCUMENT NAME	DEFINITION
<u>Validation report form</u> ¹⁸	Form filled out by the designated operational entities (DOEs) that assess whether the proposed projects meet A6.4 requirements.
<u>Request for deviation</u> ¹⁹	Form submitted by the DOE to request an exception to any of the Sustainable Development Tool requirements. Requests will be publicly listed and decided upon by the Supervisory Body. ²⁰
Registration assessment report	Report by the Secretariat expert review team with a recommendation to approve or deny registration. This report is only generated if a formal review of the registration request is initiated by a Party or Supervisory Body member. ²¹
<u>Monitoring report form</u> ²²	The project developer submits this form to an accredited DOE to show how the project has progressed in reducing or removing emissions and meeting sustainable development goals.
<u>Verification and certification report form</u> ²³	Report prepared by the DOE verifying whether the monitoring report is accurate and the project is reducing or removing emissions in compliance with A6.4 rules.
<u>Statement of authorisation</u> ²⁴	Decision by the host country on whether the issued credits will be authorised units.
Summary note on the request for issuance	Summary drafted by the Secretariat for the Supervisory Body after completeness and substantive check of a request for issuance by the DOE.
Assessment of the request for issuance	Determination and recommendation by the expert review team of whether to approve the request for issuance. Only generated if there is a request for review by the Supervisory Body.
Decision on request for issuance	Decision by the Supervisory Body about whether to approve a request for issuance, based on the summary note and assessment of the request for issuance.

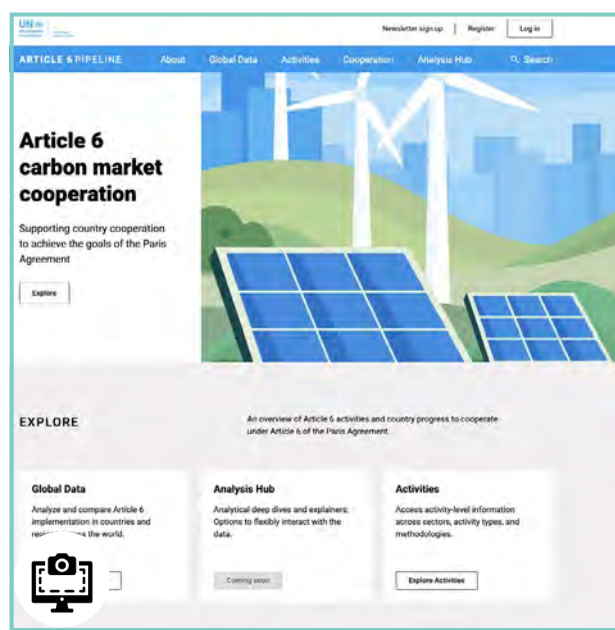
WHAT IS HAPPENING IN MY COUNTRY (BIG PICTURE)?

Maybe you have seen mention of Article 6.4 in the news or maybe you heard about it in a climate meeting. This section aims to give you tools to look for information about what is going on in your country for Article 6.4. While we will note where to find the full details in official reports, we will lean on aggregate websites that provide easy-to-find visual summaries of this information. There are two main websites that you can use to find Article 6.4 information in your country:

UNEP ARTICLE 6 PIPELINE²⁵



The UNEP Article 6 Pipeline is a website designed to track Article 6 data across sectors and countries. It aims to make the information accessible and user-friendly.



PARIS AGREEMENT CREDITING MECHANISM (PACM)²⁶

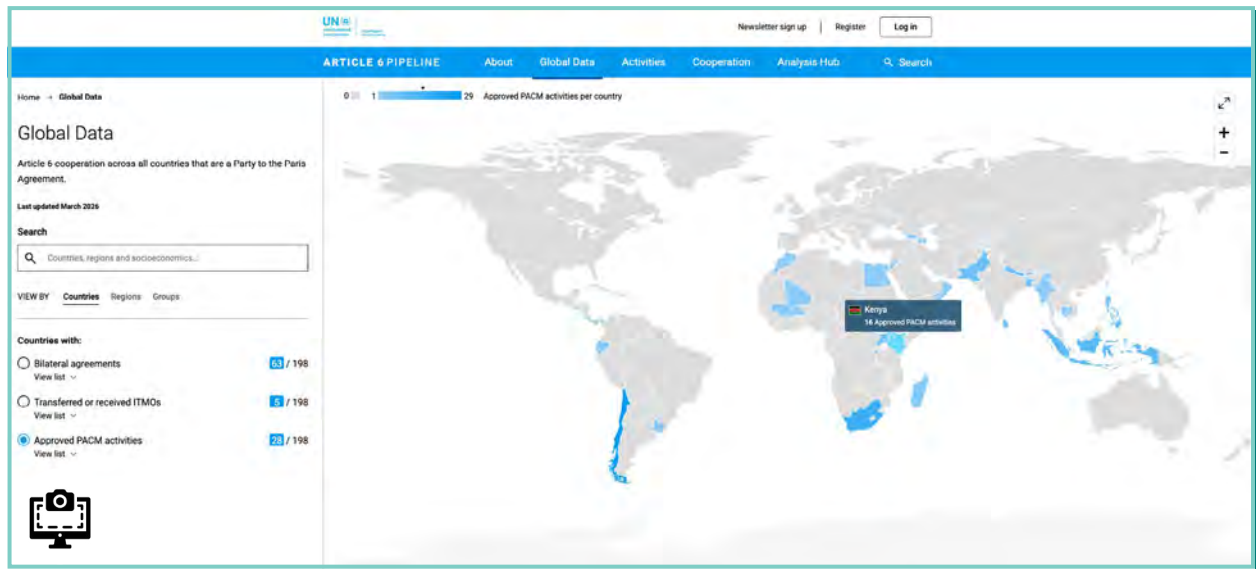


This website is the official UNFCCC reporting platform for Article 6.4. It is where project developers and designated operational entities submit their reports. While the website is being developed, reports can be found on various pages, such as proposals for [transition from CDM](#)²⁷ and [prior consideration notifications](#).²⁸



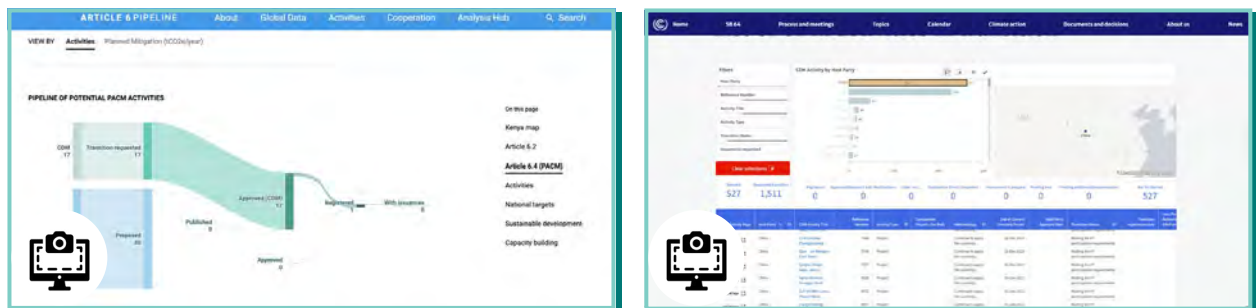
WHAT IS THE SCALE OF WHAT'S HAPPENING?

A starting point of analysing 6.4 activities is to understand how many projects are happening and their expected emission outcomes. To do this, go to the UNEP Article 6 Pipeline website, and select 'Global Data.' In the Global Data screen, you can choose your country - you may want to select the 'PACM' option on the left if you want to see the results across countries.



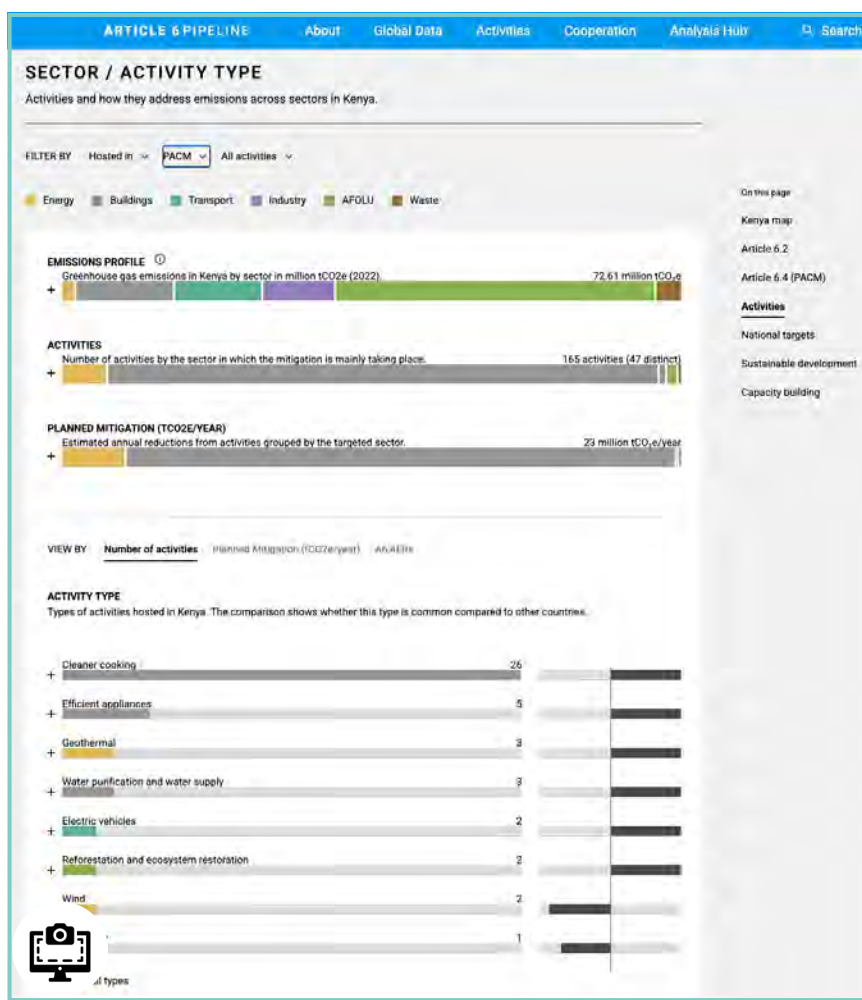
After selecting your country, you can see the number of approved PACM activities. If you scroll down to the Article 6.4 section, you can see the pipeline of activities coming from CDM transfers and prior consideration notifications. The graphic even tracks projects through the approval and registration process. You can toggle between 'Activities' and 'Planned Mitigation' to see either the number of projects or the quantity of expected emission outcomes.

The official UNFCCC sites for [transition from CDM](#)²⁹ and [prior consideration notifications](#)³⁰ also allow you to search by country to see projects and their approval process. The benefit of this page is that it provides a direct link to the project information.



WHAT SECTORS ARE INVOLVED?

Scrolling down the country page on the UNEP Article 6 Pipeline website allows you to see the different sectors for PACM (Article 6.4) projects. You can view by the number of activities or the size of mitigation outcomes. Viewing these different options can help you understand the relative priority of the different sectors. For example, some sectors may only have a few projects but have a large impact on the number of mitigation outcomes across the country. It may be surprising to see that AFOLU projects are not always the main source of mitigation outcomes.

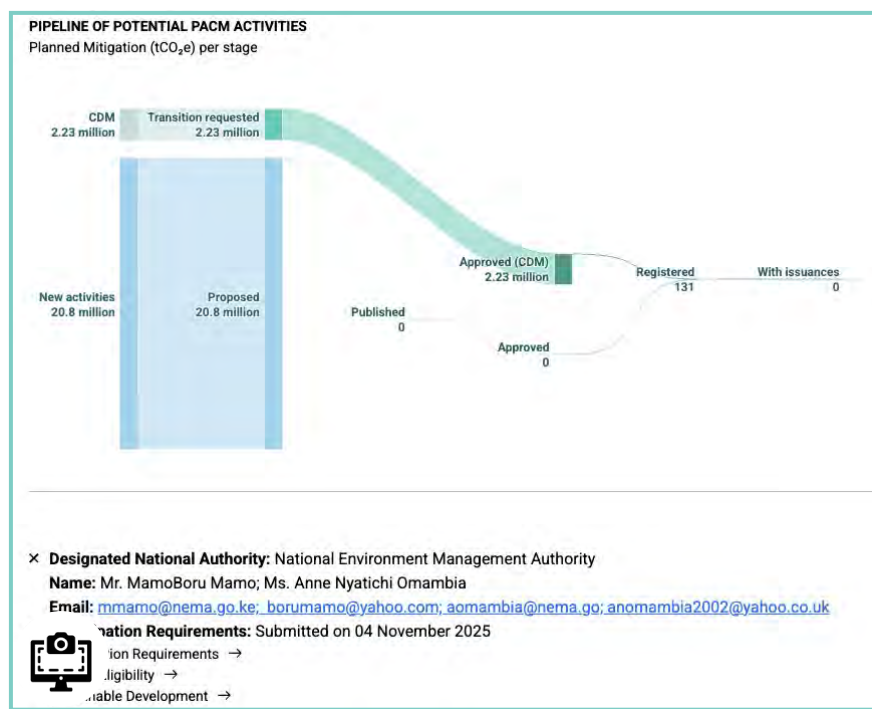


In the Host party participation form, countries can outline what sectors are included in their plans for Article 6.4 projects. For example, Chile's host party agreement lists some types of electric grid projects that it won't approve under Article 6.4.³¹

WHAT GOVERNMENT MINISTRIES ARE INVOLVED AND HOW DOES IT WORK?

To host Article 6.4 projects, governments must submit a **host party participation** form that outlines the ministry in charge of approvals and authorisations. The individual leading 6.4 work is called the **designated national authority**. You can find the name and contact information for the designated national authority on the UNEP Article 6 Pipeline country page below the pipeline of activities graphic. There is also a link there to the host party participation form.

The form asks countries to describe the approval process and often includes additional information about which offices within ministries deal with different aspects of the 6.4 projects. A full [list of the Designated National Authorities](#) and their contact information can be found on the UNFCCC website.



WORKSHEET: WHAT'S HAPPENING IN MY COUNTRY UNDER ARTICLE 6.4

This worksheet is a place where you can keep track of the key information you find on the UNEP Article 6 pipeline page.

Number of CDM projects approved for transfer: _____
 Number of proposed projects: _____
 Number of approved projects: _____
 Amount of emissions credited: _____
 Designated National Authority name: _____
 DNA contact information: _____
 Top 3 sectors for 6.4 projects by planned emissions: _____
 Top 3 sectors for 6.4 projects by issued credits (A6.4ER): _____
 Top 3 sectors for 6.4 projects by activity number: _____

HOW CAN I FIND OUT ABOUT A SPECIFIC 6.4 PROJECT IN MY COUNTRY?

Unlike Article 6.2 projects, under PACM information is published on individual projects. This section begins by showing you websites where you can see the individual projects in your country. It then answers frequently asked questions from frontline actors to help you navigate the documents and find key information. For each of these questions, we describe where to find the information for new projects and CDM transitioning projects. You can find more details on the context and vocabulary for these questions in Guide 1.

KEY PROJECT DOCUMENTS

There are a lot of documents for each Article 6.4 project, but these are the most important to look for when trying to understand your project:



Project Design Document (PDD): Drafted by the project developer at the start of the project defining the project scope, location, methodology, and process;



Validation Report: Form filled out by the DOE (organisation separate from the project developer), assesses whether the proposed projects meet carbon standard requirements;



Monitoring Report: The project developer submits to DOE to show how the project has progressed in reducing or removing emissions and meeting carbon standard rules;

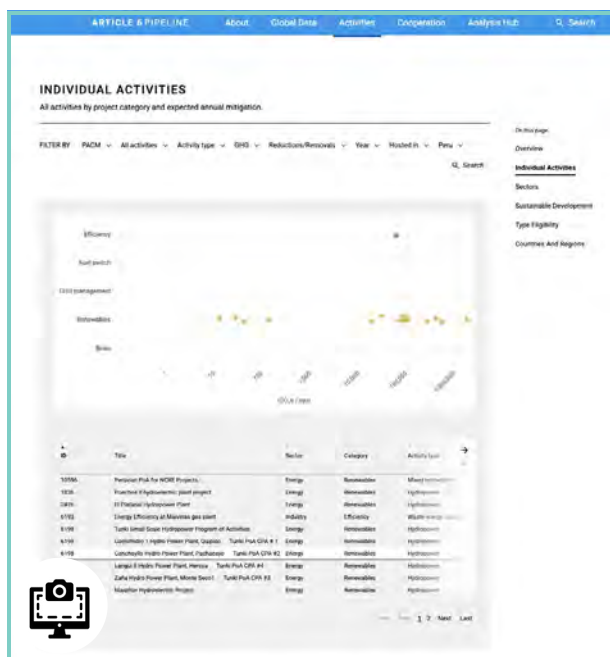


Verification Report: DOE confirms the monitoring report shows compliance with standard rules and recommends the amount of credit issuance.

There are two ways to find Article 6.4 projects in your country.

UNEP ARTICLE 6 PIPELINE SITE³⁵

On the UNEP website, go to the 'Activities' tab. Then select 'PACM', 'hosted by', and your country name. Below the graph, you will see a list of project names. By pressing the right arrow next, you can scroll to the left in the table and eventually get a link to the underlying project document. If the project is a CDM transfer project, the link will take you to the CDM website. If it is a project under prior consideration, you will see the prior consideration submission.

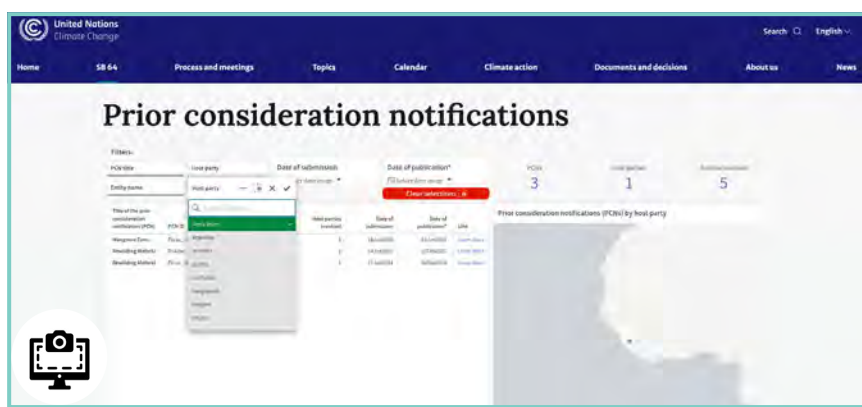


UNFCCC PACM WEBSITE³²

The alternative is to view projects through the official [UNFCCC website](#). At the time that this guide is being created, there is not a central repository of all PACM projects that can be viewed by the public. Instead, you must go to separate webpages for the [proposals for transition from CDM](#)³³ and [prior consideration notifications](#).³⁴ Each of these webpages is searchable by host country name to find the list within your country. When you click on the project name, you can access the relevant documents. For the prior consideration notifications you will go directly to the notification, while for the transitioning projects you will open a page with all of the project's CDM documents.

It is possible that in the future the projects will all be listed on one webpage. In that format, it is likely that when you click on a project name you will be able to access all the publicly available documents related to that project.

In this section, we will help guide you through questions analysing the individual project documents. We will provide how to find documents for new PACM projects and CDM transfers separately because the new projects sometimes have different documentation.



WHERE IS IT HAPPENING?

NEW PACM PROJECTS

PACM projects are required to clearly list the location of a project in the prior consideration notification and in the project design document. In the prior consideration form, project developers can list either GPS coordinates or latitude and longitude coordinates. Some projects provide one point, while others, like the example in Indonesia below, provide detailed coordinates of the polygon. The project design document requires naming the region, city/town, geographic coordinates and providing a map.

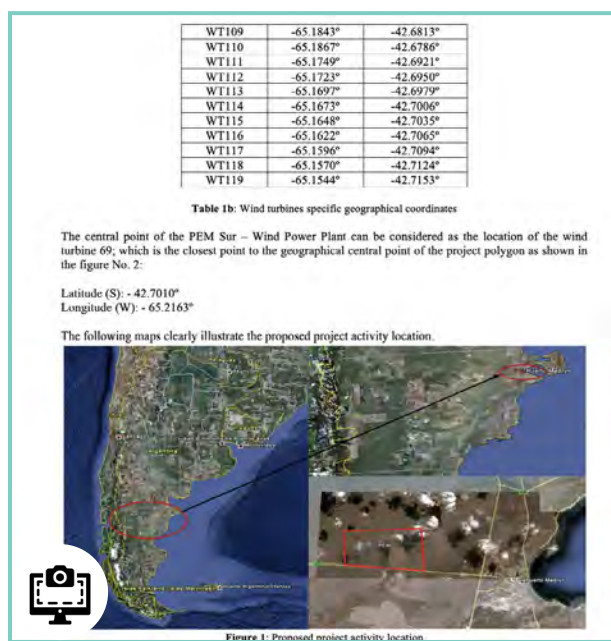
AD-4 FORM-AC-002

 **PRIOR CONSIDERATION NOTIFICATION FORM FOR ARTICLE 6.4 PROJECTS (Version 01.0)**

Project Title:	South Papua Indonesia Landscape Restoration Initiative
Names of the activity participants:	ClimaInvest, Agra Resources
Host party:	Indonesia
Precise geographical location (full address or GPS coordinates):	Longitude Latitude 138.8344223 -4.772338833 138.8477097 -4.772338833 138.801204 - 4.778982507 138.9008591 -4.795591691 138.7845948 -4.808879039 138.9041809 - 4.815522713 139.1798934 -4.815522713 139.1865371 -4.815522713 138.9373993 - 4.81884455 139.0968475 -4.81884455 138.8875717 -4.825488224 139.0968475 -4.838775572 139.1533187 -4.838775572 138.7845948 - 4.842097409 138.9340775 -4.842097409 138.9108246 -4.858706593 138.8875717 - 4.86207843 138.9108246 -4.86207843 138.7330426



Caption: Detailed coordinate information for a landscape project in Indonesia.



PROJECTS TRANSITIONING FROM CDM

Projects transitioning from the CDM have years of documents submitted to the CDM, in addition to the new documents required for the PACM. You can view those documents when clicking on the project name in the [transitioning projects webpage](#). Information about the project location was required in the project design document under the CDM. Like for projects originating in PACM, the level of detail or format of the location information may vary, but often includes coordinates and maps.

WHO IS INVOLVED?

NEW PACM PROJECTS

The project developer is described as an 'activity participant' and is named at the top of the prior consideration form. The project design document has room to list multiple participating parties and describe their roles. The name of the company validating the project, the designated operational entity, will be listed on the validation report. It may not be the same company for the initial project validation as each subsequent issuance.

PROJECTS TRANSITIONING FROM CDM

The names of approved project participants will be listed in the front of the project design document. Full contact information for project participants is often available in the first appendix or annex of the project design document. Both the PDD and validation report have also detailed information about stakeholders, and sometimes about the consultation process with stakeholders. Like in VCM projects, reading corporate descriptions about stakeholders can help you understand how the company is viewing the power dynamics in your community.

CDM-PDD-FORM

Appendix 1. Contact information of project participants

Organization name	ENERGJI ASHTA Sh.p.k
Country	ALBANIA
Address	Rruga Deshmoret e 4 Shkurtit Pall. Green Park, Nr.42, Kulla II, Kati II. Tirana 1019
Telephone	+355 4 450 4237
Fax	+355 4 450 4238
E-mail	office@energji-ashta.al
Website	www.energji-ashta.al
Contact person	Mr. Dietmar Reiner

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Caption: Project participant contact information in the appendix of the project design document for a CDM transitioning project for a hydro power plant in Albania.

WHAT METHODOLOGY IS USED TO ESTIMATE THE EMISSION OUTCOMES FOR THIS PROJECT?

NEW PACM PROJECTS

The methodology used for a project should be named clearly on the prior consideration form and the project design document. However, because the Supervisory Body is still in the process of approving methodologies, many projects asking for prior consideration do not have a methodology listed. If this is the case for a project near you, you may be interested in closely watching the discussions at the Supervisory Body about what will be counted in the new methodologies. It's also a good time to better understand what the rules could be for methodologies for your project type. For example, if you know that a methodology for cookstove projects is being considered by the Supervisory Body, reviewing the [Carbon Credit Quality Initiative's](#) guide on cookstove projects³⁶ may be helpful. You could use that information to provide comments during the Supervisory Body's review of methodologies.

PROJECTS TRANSITIONING FROM CDM

Under the CDM, the project's methodology is clearly listed on the project webpage as well as in the project design document. For most projects, you can click the methodology type to access additional information. Many methodologies under the CDM were controversial since they allowed projects to generate far too many carbon credits.

Project: 5662 HPP Ashta - Crediting Period Renewal Request	
Project	5662: HPP Ashta - project design document (1901 KB) PDD appendices - Appendix 1 - DB Emission reduction calculation spreadsheet v.4 (17 KB) - Appendix 2 - GEF_calculation_sheet_AL_v4 (5453 KB) - Appendix 3 - GEF_calculation_sheet_KO (426 KB) - Appendix 4 - GEF_calculation_sheet_ME (1814 KB) - crediting period renewal form (371 KB)
Methodologies Used	ACM0002 ver. 20 - Grid-connected electricity generation from renewable sources
VVS Version	VVS-PA 2.0
Standardized baselines used	N/A
Amount of Reductions	51,691 metric tonnes CO2 equivalent per annum
Validation Opinion	- Validation opinion (381 KB)
Renewal Date	29 Apr 21 (Renewable) (view history) completeness check ; complete info & rep check ; conclusion
Crediting Period (requested for renewal)	01 Mar 20 - 28 Feb 27 Other crediting period(s): 01 Mar 13 - 29 Feb 20
Request for Issuance and Documentation	Monitoring report: 01 Mar 2020 - 31 Dec 2020 (655 KB) Issuance request state: Issued CERs requested from 01 Jan 2013 until 31 December 2020: 33361 Serial Range: Block start: AL-5-856500-2-2-0-5662 Block end: AL-5-889160-2-2-0-5662 [Full view and History]

As a result, these methodologies are planned to be revised by the Supervisory Body in order for the PACM to be stricter in counting emission reductions or removals.

HOW MANY EMISSION OUTCOMES ARE EXPECTED TO BE INVOLVED?

Both new PACM projects and those transitioning from the CDM will list expected emission reductions in the prior consideration notification and in the project design documents. For each monitoring report, they will list the emission reductions based on the approved methodology during that crediting period. The validation and issuance reports will provide the official accounting of the project's emission outcomes.

WHAT IS BEING SAID ABOUT THE LOCAL IMPACTS OF THIS PROJECT?

NEW PACM PROJECTS

Projects approved under the PACM, unlike projects under Article 6.2, must be explicit about their sustainable development impacts. This includes a detailed assessment of the social and environmental impacts of the project that complies with specific safeguards described in the Sustainable Development Tool. Project participants also must complete the Environmental and Social Safeguards Risk Assessment form, the A6.4 Environmental and Social Management Plan form, and the A6.4 Sustainable Development Impact form as part of their project registration. During the registration phase, there is an opportunity for global stakeholder comments on the project. These comments will likely be attached to the project's portfolio. It is not clear yet where grievance reports will be tracked, but grievance reports will be transparent when the submitter does not face risk of reprisal.

CDM TRANSITIONING PROJECTS

The CDM created a voluntary tool for reporting on sustainable development impacts, the Sustainable Development Tool, but many project developers did not use the tool to assess social and environmental impacts. For projects transitioning to the PACM, project design documents must include descriptions of environmental impacts and local consultations. Projects under the CDM were notorious for under-reporting on human rights impacts, but projects that transition need to come into compliance with the Article 6.4 SD tool and human rights standards.

WHAT CAN I FIND OUT ABOUT BENEFIT SHARING?

The [Sustainable Development Tool](#) is an important PACM document to review when concerned about community impacts and benefits. The policy tool has two sections, one outlining requirements and the other a set of questions for project developers to complete as part of their PDD. While the tool is a significant step forward for recognising local impacts compared to the legal framework under the CDM, the tool has been criticised for failing to comprehensively protect land rights and having a narrow interpretation of FPIC.³⁷ Unlike other standards, it also fails to require disclosure of revenues or benefit-sharing agreements.³⁸

Reviewing what the tool does require can be useful in understanding room for advocacy or strengthening your comments during review of project documents. Regarding benefit sharing, the SD tool requires all project developers to ensure that Indigenous Peoples are provided with “equitable benefits” for the use of natural resources or traditional knowledge of their land or territories.³⁹ According to the rules, these benefits should be agreed to based on “good faith” negotiations.⁴⁰ The tool also includes broad calls to protect human rights and avoid involuntary displacement.⁴¹

You will be able to find your project’s SD tool questionnaire attached to the PDD. In the SD tool questionnaire the project developer will answer whether they believe there is a risk of the concern in the question and why or why not. When you review SD tool questionnaire, the following questions may provide some insights into how the project developer is approaching benefit sharing:

- ELQ 4a: “Does the A6.4 activity pose any risk that, during its implementation and operation, it could undermine national laws and/or international instruments for the realisation of human rights, including rights related to sustainable development, poverty alleviation, and the fair distribution of development opportunities?”
- AGQ 7.2- 4: “Would the A6.4 activity perpetuate discrimination against persons based on gender, particularly in terms of participation in the design and implementation of the activity or access to opportunities and benefits?”
- AGQ 9.6-2 “Would the A6.4 activity pose risks related to the Indigenous Peoples receiving an equitable share of benefits resulting from the use of their traditional knowledge and practices?”
 - Would the A6.4 activity pose risks related to ensuring that the sharing of benefits resulting from a good-faith negotiated agreement regarding the appropriate use of Indigenous Peoples’ traditional knowledge and practices is culturally appropriate and inclusive?
 - Would the A6.4 activity pose risks related to ensuring that the provisions of the agreement regarding the equitable sharing of benefits do not impede land rights or equal access to basic services, including health services, clean water, energy, education, safe and decent working conditions, and housing?
- AGQ 11.3-2 “Would the A6.4 activity involve a risk of not providing equitable sharing of benefits from the commercialisation of such knowledge, innovations, or practices in a way that is consistent with their customs and traditions?”

If you provide comments as part of general consultation before the registration of a project, it is possible to use these questions to ask for more complete information about benefit sharing. It is also possible to refer back to these answers during the implementation of the project to see whether your experience in the community matches what they said would happen.

There is no similar requirement to disclose information or have equitable benefits for projects under the CDM.

WHAT ARE THE PATHS FOR ACCOUNTABILITY?

This section discusses different pathways for accountability for projects under Article 6.4. Because Article 6.4 is more centralised than Article 6.2, there are clearer rules about what is acceptable and more ways to involve the UNFCCC in accountability.

HOST COUNTRY

The host country's government always has a responsibility to protect the rights of the people living and working within its borders. The accountability section in Guide 2 discusses in more detail the default protections under International Human Rights Law and national legislation.

Under Article 6.4, countries must identify their Designated National Authority. In the Host Party Participation Form, the government indicates their DNA and how they intend to uphold sustainable development outcomes as part of the Article 6.4 activities. Some governments, like Chile, broadly nod to the SD tool while others, like Panama go into great detail to note national policies that correspond with the sustainable development goals.⁴² When a government provides more detail on the connections with sustainable development, it can be a helpful opportunity to spot allies or legal hooks that can be useful in creating accountability.

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OPPORTUNITY FOR COMMENT

The Supervisory Body has created numerous opportunities for comment throughout the life cycle of a carbon project (see [page 09](#) for an overview). First, the project developer is required to conduct local consultation before requesting registration. If there are Indigenous Peoples impacted by the project, the project must obtain Free, Prior, and Informed Consent (FPIC) from the Indigenous Peoples.

After the project design document is submitted to the UNFCCC, global stakeholders have 28 days to provide comments on the project to the Supervisory Body. During the validation, the DOE must verify whether there was sufficient local stakeholder consultation and take into account any comments from the global stakeholder consultation. This can include a DOE consulting directly with community members or reviewing documents about consultations submitted by the project developer. After the Secretariat receives and checks the validation report and the registration request is published, eligible stakeholders have an opportunity to appeal the registration through the grievance and appeals process, before a final decision is made to register the project. There is no specific opportunity for comment on monitoring or verification reports before an issuance.

In addition, the ongoing work of the Supervisory Body offers opportunities for comment. Meeting agendas and proposals are often published and available for comment for seven days before the Supervisory Body meetings. Methodologies and Rules have open calls for consultation, usually for 7 to 30 days. While not all issues get addressed, there are numerous instances of the Supervisory Body changing policy in response to civil society input.

GRIEVANCE MECHANISM

The Supervisory Body created a global [grievance](#) mechanism for people socially, environmentally or economically impacted by a PACM project.⁴³ A grievance mechanism is a formal process to report harms and seek remedies. The global Article 6.4 grievance mechanism is designed to work in tandem with a project specific grievance process and local laws. The [rules](#) for filing and reviewing grievances are very specific.

At any point during a project's lifetime, anyone socially, environmentally, or economically harmed by a project can file a grievance by using a [grievance submission form](#) on the UNFCCC website.⁴⁴ The form may be submitted in any UN language but the working language of the grievance mechanism is English. The grievance to the Supervisory Body must include a description of the issue, evidence of harm or procedural failure, an explanation of how the complainant is affected, a description of a suggested remedy, and a record of any attempt to resolve at the project level.

If the grievance is viewed as eligible, it will be reviewed by a committee of experts, called a **grievance panel**. The grievance panel will decide whether to accept the grievance and if so, create recommendations for corrective actions or changes in policy.⁴⁵ The panel does not have the capacity to recommend any monetary damages. Unless there are security concerns, the secretariat will publish the result of the grievance panel. The secretariat and Supervisory Body are tasked with following up on the recommendations.

APPEALS PROCESS

Like the grievance mechanism, the appeals process is a global procedure set up by the Supervisory Body to raise questions if something has gone wrong in a project. The people who can use the appeals process and the types of complaints are different from the grievance mechanism. Three types of people can file appeals: local stakeholders, project participants, and DNAs.⁴⁶ The scope or reason for the appeal must be either the approval or rejection of a request for registration; the approval or rejection of changes to a registration; the approval or rejection of an issuance; and the approval or rejection of a request for renewal of the crediting period.⁴⁷ To file an appeal, the appellant must fill out the [appeals form](#) and must identify the project and explain the reason for the appeal. Though usually an appeal includes a \$30,000 fee, the fee is waived if the appellant is from a vulnerable group.⁴⁸ The appeal will be reviewed by a three person panel and then published on the UNFCCC website once a decision is made.⁴⁹

PUTTING PRESSURE ON THE BUYERS

There are numerous examples of pressure on buyers in the Voluntary Carbon Market, either by exposing their connection to a problematic project or by direct advocacy, creating change in carbon projects. Sometimes this has resulted in changes to local activities and other times this has resulted in changes to global policy. In the case of Article 6.4, who the buyer is, will not be clear until the credits are issued. If the host country authorises the credits, they may be included in a 6.2 ITMO transfer. In that case, you will be able to identify who the buyer country is. If the host country does not authorise the credits, it is more likely to have a company purchasing the credits. As discussed in Guide 2, engaging with journalists and other civil society allies can be a strong path to influencing buyer behaviour.

ENDNOTES

- 1 UNEP, Article 6 Pipeline, <https://article6pipeline.unepccc.org/global-data>
- 2 Standard form: <https://unfccc.int/sites/default/files/resource/A6.4-FORM-GOV-001.pdf>;
See Decision 3/CMA.3.
- 3 Standard form: <https://forms.office.com/e/MpZq1EByKf>
- 4 The non-objection letter is not required to proceed but can be helpful for project developers seeking investment in their project.
- 5 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/A64_prior_consideration/pc-list
- 6 Project Design Document Template here: <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-020.pdf> (Created April 1 2026)
- 7 See Procedure: Article 6.4 activity cycle procedure for projects, Version 3.0 A6.4-PROC-AC-002 <https://unfccc.int/sites/default/files/resource/A6.4-PROC-AC-002.pdf>
- 8 In practice, the 60 day period can be extended.
- 9 This information will be publicly available but it is not clear yet how it will be displayed within the PACM.
- 10 <https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body/meetings-of-the-supervisory-body>
- 11 Transition of CDM activities to the Article 6.4 mechanism, Version 3.0 A6.4-SBM015-A07 <https://unfccc.int/sites/default/files/resource/A6.4-SBM015-A07.pdf>
- 12 Many of the blank forms of the documents discussed in this table can be found on the UNFCCC website here: <https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body/rules-and-regulations#Forms>
- 13 <https://forms.office.com/e/MpZq1EByKf>
- 14 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-020.pdf>
- 15 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-015.xlsx>
- 16 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-027.pdf>
- 17 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-076.pdf>
- 18 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-022.pdf>
- 19 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-080.docx>
- 20 UNFCCC, Procedure: Article 6.4 activity cycle procedure for projects, Version 3.0, Section 4.6.4 <https://unfccc.int/sites/default/files/resource/A6.4-PROC-AC-002.pdf>
- 21 UNFCCC, Procedure: Article 6.4 activity cycle procedure for projects, Version 3.0, Section 5.2.2.
- 22 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-021.pdf>
- 23 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-AC-023.pdf>
- 24 <https://unfccc.int/sites/default/files/resource/A6.4-FORM-GOV-002.pdf>
- 25 <https://article6pipeline.unepccc.org/>
- 26 <https://unfccc.int/process-and-meetings/the-paris-agreement/article-64-mechanism>

- 27 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/CDM_transition/transition-list
- 28 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/A64_prior_consideration/pc-list
- 29 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/CDM_transition/transition-list
- 30 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/A64_prior_consideration/pc-list
- 31 Chile A6.4 Host Party Participation Form https://unfccc.int/sites/default/files/resource/A6.4_FORM_GOV-001_Chile_updated.pdf
- 32 <https://unfccc.int/process-and-meetings/the-paris-agreement/article-64-mechanism>
- 33 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/CDM_transition/transition-list
- 34 https://unfccc.int/process-and-meetings/the-paris-agreement/paris-agreement-crediting-mechanism/A64_prior_consideration/pc-list
- 35 <https://article6pipeline.unepccc.org/>
- 36 https://www.carboncreditquality.org/resources_factsheets.html
- 37 See e.g. Isa Mulder et al, Trading carbon credits for human rights: Does Article 6.4 of the Paris Agreement protect indigenous peoples and local communities? 2026, available at: <https://carbonmarketwatch.org/publications/trading-carbon-credits-for-human-rights/>
- 38 See e.g. Verra VCS 5.0
- 39 Article 6.4 Sustainable Development Tool, section 6.4.6, para 83, <https://unfccc.int/sites/default/files/resource/A6.4-TOOL-AC-001.pdf>
- 40 Id.
- 41 SD Tool, section 6.4.5., para 71.
- 42 Chile Host Party Participation Form for Article 6.4, available at: https://unfccc.int/sites/default/files/resource/A6.4_FORM_GOV-001_Chile_updated.pdf; Panama Host Party Participation Form for Article 6.4, available at: https://unfccc.int/sites/default/files/resource/A6.4_Host_Party_Participation_Panama.pdf
- 43 Article 6.4, Procedure: Appeal and grievance processes under the Article 6.4 mechanism (2024) v 1.0, <https://unfccc.int/sites/default/files/resource/A6.4-PROC-GOV-006.pdf>
- 44 See <https://unfccc.int/appeals-grievances>
- 45 See Appeal and grievance processes, para 47
- 46 See Appeal and grievance processes, para 7
- 47 See Appeal and grievance processes, para 9
- 48 See Appeal and grievance processes, para 13 (d)(ii)
- 49 See Appeal and grievance processes, para 16, 21



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