July 2025

INDIA'S CARBON CREDIT TRADING SYSTEM SCHEME (CCTS)

Compliance Mechanism

Years in operation	The detailed regulation for India's compliance mechanism was adopted in July 2024 to operate as an intensity-based baseline-and-credit system.		
	The initial targets are set for two fiscal years: 2025-2026 (FY 2025-26) 2026-2027 (FY 2026-27)		
	Trading is expected to start in the second half of 2026.		
Overall cap and trajectory	Total emissions limit under the Indian CCTS is the sum of the bottom-up output-based emissions limits for all individual covered entities. However, the bottom-up emissions limits do not represent an absolute cap.		
Emissions covered	CO2		
	Perfluorocarbons (PFCs)		
NDC targets	By 2030: Reduce emissions intensity by 45% below 2005 levels.		
	By 2070: Net Zero		
Sectors covered	CCTS covers nine sectors including: Aluminum Chlor-alkali Cement Pulp & Paper Fertilizers Iron & Steel Petrochemicals Petroleum Refineries Textiles		
Number of covered entities	Approximately 800 entities		
Target(s) for compliance entities	The Ministry of Environment, Forest and Climate Change (MoEFCC) notified a draft of the Greenhouse Gas (GHG) Emission Intensity Target Rules for CCTS in May 2025, covering four sectors for 2025-2026 and 2026-2027, using 2023-2024 as the baseline.		
	A total of 282 plants within these sectors are covered under the initial phase. Notification of targets for the other compliance sectors is upcoming.		
	The reduction targets are phased. For FY 2025-26, the required reductions are averaging roughly 2-3%. The targets become more stringent for FY 2026-27, with more ambitious cuts (e.g., 3.3-7.5% or higher for some sub-sectors).		

	Sector-specific target ranges mentioned include:
	Cement: 0.85% to 7.6% for OPC and PPC units.
	Aluminum: 1.9% to 7.06%.
	Pulp & Paper: Up to 15% over two years.
	Chlor-alkali: 1.32% to 4.53%.
	Obligated entities will be informed of their annual GHG targets for 3 years. Steel and Iron, Petrochemicals & Petro Refinery, Fertilizers, Textiles will be receiving targets in the coming months.
Trading rules	The Central Electricity Regulatory Commission (CERC) will act as a primary regulatory body for overseeing the trading of carbon credits on power exchanges. Carbon Credit Certificates (CCCs) issued by BEE and approved by the government can be traded on any power exchange following the applicable rules. Trading will occur monthly as approved by CERC.
	Unlimited banking of CCCs is allowed. Borrowing is not allowed. Trading of CCC's is expected to begin in 2026.
Use of offsets and linking	The Indian CCTS is not linked with any other systems.
	So far, the use of offsets is not allowed under compliance mechanism.
	There is no indicated linkage between voluntary and offset mechanism and the offset component of market is entirely voluntary in nature.
Penalties for non- compliance	In case an obligated entity fails to comply; the Central Pollution Control Board will impose penalties for the shortfall in the respective compliance year equal to twice of the average price at which CCCs traded during the trading cycle of that compliance year. The average price shall be determined by the BEE.
Other features	The CCTS builds on India's Perform-Achieve-Trade (PAT) scheme, that has been in operation under the Bureau of Energy Efficiency since 2012. PAT scheme covered 1000 entities from 13 energy intensive sectors which will be gradually transitioned into the compliance mechanism.
	A National Steering Committee for the Indian Carbon Market (NSCICM) has been established to oversee the Indian Carbon Market framework.
	A price stability mechanism is under consideration.
Use of revenue	Not defined.

Offset Mechanism

Years in operation	The Indian government established the Offset Mechanism, as part of the Carbon Credit Trading Scheme (CCTS), in December 2023. 1 st Jan 2025 is the official start date for ICM project registrations. It serves as a domestic crediting mechanism.		
Entities applicable	Any entity can register as a non-obligated entity under the Offset Mechanism.		
Sectors approved under the Offset Mechanism	The project should be within one of the ten sectors published: Energy, Industries, Waste handling and disposal, Agriculture, Forestry, Transport, Construction, Fugitive Emissions, Solvent Use, CCUS.		
Protocols approved till date	8 protocols notified till date:		
	Sector	Methodology	
	Energy	Grid-connected electricity generation from renewable sources	
	Energy	Hydrogen production from electrolysis of water	
	Industries	Energy efficiency and duel switching measures for industrial facilities	
	Industries	Hydrogen production using methane extracted from biogas	
	Industries	Landfill methane recovery	
	Waste Handling and Disposal	Flaring or use of landfill gas	
	Agriculture	Methane recovery from livestock and manure management at households and small farms	
	Forestry	Afforestation and reforestation of degraded mangrove habitats	
Registry	Registry for issuance operated by Grid Controller of India Limited (GCIL), yet to be setup.		

Other features	 Project should not be concurrently registered with any other carbon market.
	Exception applies for India's Green Credit Programme.
	 If the project activity matches MoEFCC's Article 6.2 list, non-obligated entities
	may seek authorisation for corresponding adjustments and trade CCCs
	internationally via the ICM portal.
	 Non-labelled CCC's (outside of Article 6.2) may still be allowed to sell
	internationally for voluntary purposes, as emission reductions will be accounted
	towards India's NDC targets.

MAJOR DEVELOPMENTS

- i) <u>Article 6 Whitelist:</u> In 2023, The Ministry of Environment, Forest, and Climate Change rolled out a list of activities for trading of carbon credits eligible under Article 6.2 mechanism of Paris Agreement. The list of activities was initially approved for the first 3 years and may be revised by NADAIPA. Link <u>here</u>. List for eligible activities for Article 6.4 Mechanism for Paris Agreement was rolled out in June 2024 and can be found <u>here</u>. At the time of writing, India has not concluded negotiations around any bilateral cooperative approaches.
- ii) Draft Notification for GEI Reduction Targets under Compliance Mechanism: The Ministry of Environment, Forest and Climate Change (MoEFCC) notified a draft notification concerning potential targets for certain industries on April 16th, 2025. This draft notification notifies Greenhouse Gas Emission Intensity (GEI) reduction targets for certain industries such as aluminum, cement, chlor-alkali, and pulp and paper entities. Formal targets will be notified in a subsequent notification. Draft targets for the remaining sectors, namely Fertilizers, Iron & Steel, Petrochemicals, Petroleum Refineries, and Textiles are likely to be introduced in later notifications.

iii) Applications open for ACV agencies, projects and entities to register for offset mechanism: On June 4th 2025, the Bureau of Energy Efficiency also opened applications for entities interested in becoming Accredited Carbon Verification (ACV) Agencies for the Indian CCTS. Link to registration is attached <u>here.</u> On June 6th, 2025, the Bureau of Energy Efficiency announced the opening of registrations for entities to register themselves as non-obligated entities under the offset mechanism. The form is available <u>here</u>. The Bureau is also inviting entities to express their interest in registering their project activities within the 'Offset Mechanism' of the Carbon Credit Trading Scheme. Link attached: <u>Project Information Form</u>



REFERENCES

Bureau of Energy Efficiency (BEE) Carbon Credit Trading Scheme Notification, 2023

Bureau of Energy Efficiency (BEE), July 2024 Detailed Procedure for Compliance Mechanism under CCTS

Bureau of Energy Efficiency (BEE), March 2025 Detailed Procedure for Offset Mechanism under CCTS

Ministry of Power Offset Mechanism Notification

Office Memorandum, Bureau of Energy Efficiency Sectoral Scope and Approved Sectors under Offset Mechanism

Bureau of Energy Efficiency (BEE) Methodologies under Offset Mechanism

Bureau of Energy Efficiency (BEE), July 2024 Accreditation Procedure and Eligibility Criteria for Accredited Carbon Verification Agency

Government of India, Ministry of Environment, Forest and Climate change Draft Target Setting Notification for Certain Sectors

Bureau of Energy Efficiency Portal for Application to be Accredited Carbon Verification (ACV) Agencies for India CCTS

Bureau of Energy Efficiency Registration Form for Entities to Register as Non-Obligated Entities under the Offset Mechanism

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