Call for public input – Template for input

Draft Standard: Article 6.4 mechanism activity standard for projects (ver. 03.0)

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Legend for Columns

- **0** = Main document or Appendix (provide Appendix number)
- 1 = Section Number in the document or Appendix
- 2= Paragraph, table or figure number
- **3** = Nature of input is general, technical or editorial
- 4 = Comment the actual feedback or observation, including justification for what needs changing
- 5 = Proposed change suggest the text if possible
- 6 = Assessment of comment secretariat to document response/action taken to comment

0	1	2	3	4	5	6
M or A#	Section no.	Para., table or figure no.	Type of input G = general T = technical E= editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
M	6.3	15-16	G	Regarding the options presented in para 15 and 16, IETA believes that option 2 (no restriction of double registration in relation to other crediting schemes) would be preferred. This would encourage market participation and allow for flexibility to projects which may also be covered under domestic carbon pricing frameworks or subnational schemes. The same methodological guidance and criteria still applies in terms of additionality assessment. Due to the delayed implementation and uncertainty regarding the full operationalisation of the Article 6.4 mechanism, project developers are left with a time gap between the CDM and the new 6.4 mechanism. Excluding projects that have pursued, or registered, under other crediting programmes during this gap, would potentially limit the effectiveness and uptake of the new 6.4 mechanism once operational.	Adopt Option 2, deleting 15 (a) and (b) as well as 16. (a) to clarify and streamline the process.	
M	6.3	15	Т	If adopting Option 1, the term "excluded" should be defined more clearly to identify the cases under which the projects may apply. Otherwise, activity participants will find it challenging to understand whether this condition apply to their projects.	Define "excluded".	
M	6.5.3	37	G	Clarify which GHG mitigation schemes would be considered "higher" than the Article 6.4 mechanism. Specify what would be the relation between projects registered under different crediting schemes.		

0	1	2	3	4	5	6
M or A#	Section no.	Para., table or figure no.	Type of input G = general T = technical E= editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
M	8.3	95	T/E	This a very long sentence which is difficult to comprehend. The sentence seems to limit the "overlap" to claims on emission reduction/removals made by the same project proponent i.e. double issuance. A footnote on double counting may help (e.g. to clarify situations where project bought-in goods or services (like electricity) reduce in intensity over time in response to a separate GHG mitigation crediting scheme). Does this situation need also to be addressed?	Some more punctuation would improve readability.	
M	8.6	103, 104 ,105	E	These are very long sentences which are difficult to comprehend. The sentences cannot be readily parsed into the key differentiators being set out in each paragraph.	Some more punctuation would improve readability. In this case, sub-bulleting could help to map out and parse the pathway through all this. For example, all three sentences seemingly start with the same clause ["For a registered A6.4 project that applied a methodology or methodological tool providing a choice between an ex ante and an ex post determination of parameter values for calculating baseline GHG emissions or net GHG removals"]. So, the secondary clause from 103, 104 and 105 become the branches for subbullets. Similarly, activity participants in each case are instructed to do something different. In two cases there is a "shall" and in one case a "may". These actions should be made much clearer.	