

**Submission by the Russian Federation on options for implementing the  
infrastructure requirements referred to in chapter VI of the annex  
(Recording and tracking)  
pursuant to paragraph 8 of 2/CMA.3**

*March 2022*

- Annex VI (Recording and tracking) to the Decision 2/CMA.3 provides that
29. *Each participating Party shall have, or have access to, a **registry** for the purpose of tracking and shall ensure that such registry records, including through unique identifiers, as applicable: authorization, first transfer, transfer, acquisition, use towards NDCs, authorization for use towards other international mitigation purposes, and voluntary cancellation (including for overall mitigation in global emissions, if applicable), and shall have accounts as necessary.*
  30. *The secretariat shall implement an international registry for participating Parties that do not have or do not have access to a registry. The international registry shall be able to perform the functions set out in paragraph 27 above. Any Party may request an account in the international registry.*
  31. *The international registry shall be part of the centralized accounting and reporting platform referred to in chapter VI.C below (Centralized accounting and reporting platform).*

*The Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement:*

- does not imply that the *registries* referred to in para 29 shall be operated by the Secretariat or any other institutional arrangement established by the decisions of the CMA or the Subsidiary Bodies;
- does not imply any mandatory linkages between the *registry* and the Article 6 Database and/or the CARP, except for national reporting under Article 6.2.

Further requirements for the *registries* should be derived taking into account:

- the intention to use the *registries* for the purposes of the Article 6 technical expert review;
- the variety of options for national authorization procedure;
- technical complications and financial costs of implementation.

The issue of interrelation between (1) the international registry and (2) the *registries* established by the Parties requires further clarification. It is also not clear if bilateral/multilateral *registries* for each authorized cooperative approach can be created and how national *registries* covering various sets of cooperative approaches can be linked. Description of a minimum set of procedures between the registries taking into account the abovementioned issues is important as well.

Current wording of the *Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement* allows for two options of the

implementation of the *registries* that differ in terms of functions and corresponding technical requirements.

**Option A** would imply a national *registry* encompassing all the cooperative approaches **implemented by a given Party**. It would facilitate crosschecking of the information on ITMOs provided by Parties given that the technical expert review team has access to the data of the *registry*. To this end, the *registry* should include information mirroring annual information with specification of a cooperative approach (to check alignment of data with the other Party to a cooperative approach), vintage (to track corresponding adjustments), type of activity (to choose NDC-related indicators to which corresponding adjustments are applied).

On the other hand, such an approach would either mean that information in the *registry* would duplicate data already existing in other sources, or require significant technical work to automate the interlinkages with these sources.

The use of metadata for each indicator of the registry can be an alternative option.

The *Guidance on cooperative approaches referred to in Article 6, paragraph 2, of the Paris Agreement* does not require the *registry* to issue ITMOs. If the **ITMOs are not initially issued in the registry**, it would serve as a national database of **ITMOs issued in other registries that were established for each cooperative approach separately (Option A1)**. Therefore, information about them could be stored both in the registry of issuance and the *registry* under A6.2. Therefore, provisions should be made to ensure that such duplication of information is not considered to be double counting. In addition, it should be ensured that data on ITMOs is communicated (manually or automatically) from the registry of issuance to the A6.2 *registry* without significant delays. That would require establishing common:

- timeframe for information transfer (authorization of an ITMO could serve as a trigger);
- route, set and format of data transferred (through registry operators or through automated direct data exchange between registries; categories of data should be aligned for seamless exchanges);
- marking of ITMOs in the registry of issuance once information on them was reported to a Article 6.2 *registry*.

Since the same information on ITMOs would be reported by Parties, the *registry* would serve as an additional step in national data collection increasing the costs of implementation. Costs could be related to data transmission and storage, a *registry* operation, adding new functions to existing registries of issuance.

If all the **ITMOs are to be issued in the Article 6.2 registry (Option A2)**, it would require significant technical work to ensure alignment of issuance procedures and data transfers among different programs constituting cooperative approaches, some of which may already have established rules of operation and infrastructure. That would include issues of access and rights of various stakeholders related to data in the registry, discrepancies in the range of information on ITMOs required under different cooperative approaches (for example, SDG ratings) and additional activity-related information (geographical location and participating entities, etc.), operational costs sharing

(including the peculiarities of cooperative approaches that allow for the issuance of emission reductions or removals that do not qualify as ITMOs).

The challenges of closer alignment and unification of data are especially relevant for host Parties as they are more likely to engage in more than one cooperative approach.

**Option B with a registry for each cooperative approach** could entail a lesser financial burden and fewer technical implications. In this case, ITMOs would be issued in a *registry*. It would need to include all the relevant information on ITMOs (referred to in para 29, as well as vintage and type of activity), but any additional data would be added based on internal rules and requirements of a particular cooperative approach. A Party would need to ensure that there is a procedure to collect the information required for reporting under Article 6.2 from each *registry*. Data collection procedures could be more flexible in terms of timing and are likely to be dependent on reporting timing.

Such an approach would be less burdensome as it would require additional interactions between the *registry* operator and national authorities responsible for Article 6.2 reporting rather than changes in existing infrastructure. However, crosschecking of information with each cooperative approach would complicate the work of technical expert review team.

Additional issues to be resolved with further guidance on recording and tracking include the following.

- Detailed requirements and clarification of the information on ITMOs that shall be recorded in the registry. Namely, correlation between the ‘authorization’ data and ‘first transfer’ data as the definition of the first transfer under para 2b includes ‘authorization for other international mitigation purposes’. As mentioned above, data on vintage and type of activity is also important for consistency reviews.
- Alignment of information exchanges between the registry and/or registries and the national authority in charge of Article 6.2 reporting with authorization procedures. According to para 18g, a Party is required to ‘*provide, for each cooperative approach, a copy of the authorization by the participating Party, a description of the approach, its duration, the expected mitigation for each year of its duration, and the participating Parties involved and authorized entities*’. Para 20a reads that a Party shall submit ‘*annual information on authorization of ITMOs for use towards achievement of NDCs, authorization of ITMOs for use towards other international mitigation purposes, first transfer, transfer, acquisition, holdings, cancellation, voluntary cancellation, voluntary cancellation of mitigation outcomes or ITMOs towards overall mitigation in global emissions, and use towards NDCs*’. Annex to 3/CMA.3 provides for the ‘*the host Party [for Article 6, paragraph 4, activity] 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 -/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*’. This leaves uncertainty about the

timing of authorization (prior to activity or prior to the first transfer) and its level (for all the activities under the same cooperative approach, for each activity or for each ITMO). Authorization is likely to be the trigger for the data transfer (**Option A1**) or a distinguishing quality for emissions reductions or removals that are subject to data transfer (**Option A2 and Option B**).

- Recording and reporting of emissions reduction and removals transferred to technical accounts (buffering) for the purpose of non-permanence risks mitigation.