**India’s submission on**

**Article 6.2 based on CMA’s decision on the Guidance on Cooperative Approaches referred to in Article 6, paragraph 2, of the Paris Agreement**

India welcomes the opportunity to address the topic of Article 6.2 cooperative mechanisms, specifically with respect to the decision text adopted in Glasgow which invited Parties to submit views and information in Paragraph 4 of the Decision -/CMA.3.

Paragraph 4 of Decision -/CMA.3 *“Invites submissions from Parties on options for the tables and outlines for the information required pursuant to chapter IV of the annex (Reporting), by 31 March 2022 via the submission portal.”*

India recognizes the need to operationalize cooperative approaches in the context of Article 6, paragraph 2, of the Paris Agreement. Article 6.2 provides a robust accounting framework to avoid double counting of emission reductions (ERs) that are traded as Internationally Transferred Mitigation Outcomes (ITMOs). This accounting framework will help ensure environmental integrity and transparency of outcomes, transfers, and use of ITMOs and ERs, in cooperative approaches.

Annexure IV of the Article 6.2 decision -/CMA.3 mandates that participating Parties must submit the initial report, annual information report, and regular information report. These reports contain extensive informational elements including but not limited to linkages with NDC, linkages with long term goal of Paris Agreement, and more. Some of the informational elements under Article 6.2 are also included in the Parties’ Biennial Transparency Reports (BTRs). Therefore, it is imperative that reporting requirements under Article 6.2 are aligned with those in Article 13.

To alleviate reporting burden on developing country Parties, India believes it is imperative to understand and explore the interplay between Article 6.2 reporting requirements and Article 13 transparency requirements.

Decision -/CMA.3 mandates certain information items in the initial report and regular information report such as timing of submission of initial report, authorization of the use of ITMOs, and quantity of ITMOs applied for corresponding adjustments (CAs).

India’s position on the information items is as follows:

**Regarding timing of submission of initial report**

India supports the option to submit the initial report with the first Biennial Transparency Report (BTR) in 2024 as per Paragraph 18 in the Annex of the Decision -/CMA.3 on Article 6.2.

This would enhance administrative effectiveness and reduce administrative burden on developing countries. Accordingly, coordination and communication burdens, both internally and internationally, would be reduced. Furthermore, it may enable Parties to include more extensive statistics and information about ITMOs in their BTRs, improving transparency and accuracy of reporting. This alternative may also provide countries more time to set up the required infrastructure for tracking ITMOs and coordinate with partner countries.

The alternative option of submitting the initial report before the initial first transfer of ITMOs will increase administrative burden due to enhanced coordination requirements between different stakeholders.

**Regarding authorization of the use of ITMOs**

India supports that for cooperative approaches, bilateral authorization should be given by the Parties participating in the cooperative Art 6.2 activity. This high-level governance will enable Parties to authorize ITMOs at high-level joint meetings or in joint committees. This would utilize existing infrastructure and reduce administrative burden on the Parties.

Further, in terms of the level of authorization of ITMOs/ERs, India would support the authorization of ITMOs/ERs at an activity/project/programme level. This would greatly reduce administrative burden on Parties as the ITMOs authorized for transfer will be from activities aligned with domestic policies and approval processes.

India believes that all the options of ITMOs/ERs level, activity/project level, and scheme/program/policy level authorizations of transfers should be available to Parties to be employed as circumstances of the Art 6 activity require.

Further, India requests that UNFCCC may also provide the formats and templates for reporting authorization of ITMOs. Furthermore, there should be additional clarity on the implications if reporting on ITMO authorization from participating Parties is delayed.

**Regarding the quantity of ITMOs applied for Corresponding Adjustments (CAs)**

Article 6.2 decision -/CMA.3 mandates that Parties ensure transparency on how ITMOs are acquired and used towards the achievement of NDC or towards other international mitigation purposes. This information is required to be submitted through the regular information report as part of the BTRs. The annual information report is included in the regular information report and annual and aggregate quantities of ITMOs both transferred internationally and used towards Parties’ NDC.

In the options for the application of CAs, India would support reporting and applying CAs based on the first transfer year date instead of the vintage year date.

India seeks further clarification on the question: where first transfer occurs after the NDC period, in these cases whether the issuance year can be considered as first transfer.

Further, India would like to underscore that there are certain areas across initial reporting, annual information, and regular information that will need to be discussed at the SBSTA. Areas for discussion would include, but are not limited to, the format of the initial report, database linkages across initial report and annual information report, and how registries will connect with the three reports and transparency requirements.

India will support and participate in discussions regarding the reporting requirements under the Article 6.2 decision -/CMA.3. However, it is important for Parties to be cognizant of the resource and capacity requirements to implement the transparency framework and robust accounting methodologies. Financial transfers to developing countries for technology support and capacity building will help institutionalize and operationalize these robust requirements.

India reserves the right to make additional submissions and present further views on the relevant issues connected with Article 6.2 based on CMA’s decision under United Nations Framework Convention on Climate Change (UNFCCC).