

CLARA submission of views on Article 6.8 -- 30 August 2022

ActionAid International is pleased to submit this document on behalf of the Climate Land Ambition and Rights Alliance (CLARA).

Making Article 6 work for NDC ambition

International Cooperation for mitigation ambition is the purpose that drives Article 6 of the Paris Agreement. Countries are free to pursue ITMOs ('internationally transferred mitigation obligations') under the Article 6.2 mechanism. An Article 6.4 Supervisory Body is now starting work to bring proper governance to, and standardization of, the complex crediting systems now in use in different carbon and offset markets.

Meanwhile, non-market mechanisms under Article 6.8 are still under negotiation and development, and waiting for an agreement at COP27 on two areas proposed by the SBSTA Chair in the 'Draft Conclusions' document ([SBSTA/2022/L.11](#)): specifications for the UNFCCC web-based platform for non-market approaches, and types of actions that facilitate NDC ambition using NMAs.

Building from the Draft Conclusions and the [Informal Note](#) by the Co-Chairs of the Glasgow Committee on Non-market Approaches, based on Parties' views as discussed in Bonn, [CLARA](#) responds below to the specific requests for input regarding elements of Decision 4/CMA.3. We want to see the Platform constructed for operationalizing NMAs that are prioritized by countries in their Nationally Determined Contributions. Below we lay out the rationale for the launch of an Article 6.8 operational platform at Sharm al-Sheikh as well as the importance of scaling up non-market approaches as part of the 'balanced package' on Article 6 agreed at Glasgow.

- **Immediate:** The Draft Conclusions document doesn't cite a need for new rules. It simply calls for agreement on which existing or proposed new activities will be part of the 6.8 framework initially, as part of the Glasgow Committee on NMA, and specifications of a new UNFCCC platform to help drive ambition. We fully expect that negotiators will be able to reach agreement on these 'nuts and bolts' issues at COP27.
- **Not dependent on carbon accounting.** Contrast the relatively streamlined set of decisions to be taken to operationalize Article 6.8 with the arduous rule-writing agenda set before the Article 6.4 Supervisory Body. We predict it will take years for agreement on Article 6.4 rules to be complete. More importantly – Article 6.8 creates no crediting system, and therefore no need for complex record-keeping in relation to financial transfers, and no new capacity requirements for measuring emission reductions. Most importantly – Article 6.8 does not reassign credits to non-sovereign entities. 100% of NMA mitigation benefits are realized as emission reductions.
- **Scales up existing activities.** The Chair's Draft Conclusions takes as a given that Article 6.8 will build on existing development efforts that have mitigation benefits. The task now is to identify which of these are most promising and appropriate for scale-up.

- **A broad range of financing approaches are appropriate:** multilateral approaches supporting regional NMAs, bilateral finance building on existing country engagements, as well as private finance. Article 6.8 can accommodate contributions to mitigation action from corporate and other entities seeking to take responsibility for emissions without using offsets. Tropical forest countries that signed the [Glasgow Leaders Declaration](#) can work with the [national and private donors that pledged \\$1.7B](#) at Glasgow to scale up conservation efforts as part of an overall non-market approach that includes mitigation, adaptation, and biodiversity benefits.
- **Matching mechanism.** The proposed NMA website/portal provides an excellent opportunity for countries to clarify those sectors and regions that would benefit from international cooperation, and to make explicit the set of activities proposed to increase mitigation ambition through a matching facility that shall articulate the needs of developing countries on NMA-based actions and provision of finance, technical transfer and capacity building.
- **Voluntary contributions.** It was made clear at SBSTA56 that the launch of the Article 6.8 mechanism places no new mandatory funding requirements on any Party or other entity.

We now consider the five ‘elements of a draft decision’ about which the SBSTA Chair sought input ahead of COP27.

- a) **Schedule.** CLARA supports use of the timetable attached to the Informal Note accompanying SBSTA/2022/L.11. In previous submissions, CLARA commented extensively on the range of activities and measures that should be included as NMAs under Article 6.8. We agree with the Informal Note that identifying NMAs and enabling measures can be concluded in November 2022, based on work already completed by the Secretariat. We urge Parties at COP27 to begin the process of sharing best practices and implementation approaches, as is outlined in B1-3 of the Informal Note timetable.
- b) **Specifications of the web-based platform.** CLARA appreciates the effort by the Co-Chairs to capture the range of ideas about the platform in the Informal Note. CLARA also supports submissions from the Like-Minded Developing Countries, and observer Worldwide Fund for Nature, made prior to SBSTA56, and the detailed ideas regarding the platform contained therein. The function of the operational Platform is to link NMAs to enhanced ambition in NDCs by matching needs with support. It should not be simply a ‘knowledge-sharing’ platform. To accomplish this, the Platform should include i) a Registry for actions, ii) a matching facility that presents clear opportunities for enhancing NDC ambition; and iii) a means of connecting the various UNFCCC entities, to initiate a discussion on how they can also support non-market approaches.
- c) **Actions that facilitate implementation.** CLARA member organizations focus primarily on issues related to land use. Our [February 2022 submission](#) argued for the relevance of Article 6.8 to increasing land-sector climate ambition through joint mitigation-adaptation (JMA) approaches that improve community resilience and resource management in response to the changing climate.
- d) **Initiatives, programs, activities.** Reflecting Sectoral Guidance on Land Use from the Green Climate Fund, [CLARA’s 2021 submission](#) on Article 6.8 referred to the priorities of “Protection, Restoration, and Sustainable Forest Management centered on community forest governance.” We argued that use of this hierarchy of action in the land-use sector can anchor an Article 6.8

mechanism, distinct from the less well defined 'Nature-based Solutions' approach still being pursued under Articles 6.2 and 6.4 and in the Standing Committee on Finance. CLARA further argues that activities outlined in the 2022-25 Strategic Plan of the Local Communities and Indigenous Peoples (LCIP) Platform can be better mainstreamed *via* Article 6.8.

- e) **Preambular elements.** CLARA deeply appreciates the Chair's request for consideration of how NMAs will support those elements of the Paris Agreement Preamble that, as a matter of international treaty law, should be considered in all programs and actions undertaken through all Article 6 mechanisms. We believe that an independent review mechanism is needed to ensure the appropriateness of activities taken under both Article 6.4 and 6.8 mechanisms.