SUBMISSION BY SPAIN AND THE EUROPEAN COMMISSION ON BEHALF OF THE EUROPEAN UNION AND ITS MEMBER STATES

Madrid, 14 July 2023

Subject: Submission on Article 6.2 of the Paris Agreement including views on authorizations, the agreed electronic format (AEF) and first transfers, and views on the functional requirements for the centralized accounting and reporting platform (CARP), the Article 6 database (A6 DB) and the international registry.

The EU is pleased to submit its views on the functional requirements for the CARP, the A6 DB and the international registry, based on the 2 following documents prepared by the secretariat, and requested by paragraphs 26 and 33(c) of decision 6/CMA.4:
- "Functional requirements for the centralized accounting and reporting platform and the Article 6 database, v01.1, dated 02/06/2023" (https://unfccc.int/documents/628727) and
- "Functional requirements and associated cost estimates for the international registry, v0.1.1, dated 02/06/2023" (https://unfccc.int/documents/628728)

In addition to the above, we have also included in this submission our views expressed during SBSTA58 regarding:

- the agreed electronic format (AEF),
- the authorizations (timing, changes and content),
- the definition of first transfers.

This is because we consider that further guidance is needed in respect of these elements, and any decision on those elements will have direct implications for the functionalities of the CARP, the A6 DB and the registries. Therefore, an agreement on those elements is needed before we can finalise all the detailed functionalities for the CARP, the A6 DB and the registries.

We would start by insisting that tracking and recording of mitigation outcomes under Article 6.2 should be enabled through a system based on 'transfers' of ITMOs between registries (centralised system), next to a system based on 'pulling and viewing' of information from underlying cooperative approach registries (decentralised system). For both systems it is essential to clearly understand the flow of information, including through reporting by countries and interoperability of registries.

With respect to infrastructure design and development, it will also be essential to have a clear understanding of both the level of demand for infrastructure services and potential costs of implementation for centralised and decentralised infrastructure for the UNFCCC, and for implementing Parties, before proceeding to implementation.

Section 1: Authorizations, AEF and first transfer

Regarding different types of authorisations and definition of cooperative approaches

We consider it of critical importance that CMA5 adopts minimum requirements regarding the content, the timing, the format and possible changes or revocation of authorisations. The minimum elements of authorizations should be reflected in information on cooperative approaches, ITMOs and entities, as included in the international registry and national registries as well as the AEF. It should also be used for conducting the consistency checks in relation to information submitted by Parties.

Article 6.2 guidance mandates three distinct types of authorisations, at distinct stages in implementation of the cooperative approach:

- Authorisation of the cooperative approach
- Authorisation of the ITMOs
- Authorisation of entities

Adopting minimum requirements for each type of authorisation is key to support transparency and enable tracking and reconciliation of ITMOs and corresponding adjustments, but also to allow the finalisation and adoption of the AEF. We also recall that some guidance is needed to clarify:

- the minimum information needed for each of the three different authorizations,
- where this information should be reported.

The technical workshop in Bonn in April showed that the flexibility granted in previous CMA decisions, such as the definition of first transfer, creates some complexity for the structure of the AEF. The AEF must be able to cover different scenarios under which Parties may engage in ITMOs. This has implications for the information that needs to be included in authorizations.

Some of the information included in authorisations needs to be incorporated into the International Registry and national A6.2 registries, in order to enable registries to identify which actions are eligible and consistent with the authorization, and for registries to pre-fill the AEF. The annex to this submission includes a list of minimum requirements for each type of authorisation and which of those requirements are needed for the technical functioning of the international registry and national Article 6.2 registries and A6 database.

In this context, it is also important that CMA5 provides clarity on the subject of authorisation of a cooperative approach, and a definition of cooperative approach is needed to deliver transparency and coherence in the reporting and review process.

Authorisations of cooperative approaches should refer to an agreement, and associated arrangements for cooperation. In this context, a cooperative approach should be defined as being:

- *a set of agreed standards and procedures that govern:*
  - *the voluntary participation of Parties in Article 6.2 in respect of an agreed scope of activities and the international transfer of mitigation*

outcomes between them, including with respect to the relevant implementing CMA decisions (regarding authorisation, tracking, reporting and accounting, integrity requirements, etc.), and

o *the relationship of the cooperative approach to any underlying mechanism or mechanism.*

Discussions during the informal workshops in Bonn in April and May showed divergent views and interpretation of what is a cooperative approach, resulting in different views on how to report information in the initial report and in the AEF. In turn, this could result in a large number of initial reports being submitted and have impact on the review process.

We also think that CMA5 guidance should clarify that:

- ITMOs shall only be transferred between Parties participating in the cooperative approach
- ITMOs can only be used for the purposes provided in the authorisation. For example, an ITMO authorised for use towards NDCs cannot be used towards OIMP without a change in the relevant authorisation. CMA5 could further clarify that the first transferring Party shall define the use towards which an ITMO is authorized.
- ITMOs shall only be used by entities that are authorised. An entity needs at least to be authorised by the Party in whose registry the entity is going to hold, transfer or use the ITMOs.

Regarding the timing and reporting of authorisation

Regarding the timing and reporting of authorization, we recommend that further guidance on Article 6.2, to be adopted by CMA5, clarifies the following:

Timing

- Parties shall provide the authorization referred to in paragraph 18(g) of the Annex to decision 2/CMA.3 prior to or in conjunction with the authorisation of specific ITMOs.
- Parties shall authorize specific ITMOs prior to their use or transfer to another Party or to an authorized entity.
- Parties shall authorize entities prior to any transfer of ITMOs to those entities.

Reporting

- Authorisation of a cooperative approach should be reported in the initial reports, the updated initial reports (for new approaches) and in the BTR (for updates to existing approaches).
- The approach to authorisation of ITMOs should be reported in the initial report, the ITMOS subsequently authorised should be reported in the AEF, and the summary of information on authorized ITMOs should be reported in the BTR
- The approach to authorisation of entities should be reported in the initial report (e.g. whether entities will be authorised and if so, the type of entities that will be

authorized), the entities authorised in respect of each block of ITMOs should be reported in the AEF and the summary of this information should be reported in the BTR.

Regarding changes or revocation of authorisation

Paragraph 21(c) of the Article 6.2 guidance states that any 'changes to earlier authorisations' would need to be reported under the regular information. This implies that changes can possibly be made to authorisations. However, there is no further indication on what type of changes can be made, at which time they can be made and under what conditions, and what the consequences of such changes would be for the Parties involved. This needs to be further defined.

Revocation and certain substantive changes of authorisations can be problematic, depending on the timing. Allowing for certain changes or revocations could imply retroactive correction/adjustments/reclassification of already reported information. If changes are made after an ITMO has been transferred to another Party or an entity, it may require several actions in the A6.2 registries (and possibly in the reporting in the AEF and the application of corresponding adjustments), to roll back the transfers and use. The system would thus get more complex, more difficult to monitor and more prone to errors. Furthermore, it can create considerable uncertainty and can undermine the functioning of the market. Depending on the type of change and the timing, the impact might differ significantly though.

The principle of non-retroactivity should be the underlying principle for any decision on (substantive) changes to authorisation. We believe that further guidance on Article 6.2, to be adopted at CMA5, should clarify that:

- Parties should not revoke an authorisation, or change the authorized use (NDC, OIMP or NDC/OIMP), of ITMOs that have already been transferred to another Party or to an authorized entity.
- Any revoking of an authorisation for a cooperative approach should not apply to ITMOs that have already been transferred to another Party or to an authorized entity.
- When revoking an authorisation for an entity, this should not affect ITMOs already transferred.

We further suggest that the secretariat includes in the technical paper referred to in document UNFCCC/SBSTA/2023/L.6 paragraph 6 (a), elements related to authorizations, including on:

- the content, format, and timing of the three types of authorisations
- the possible scope for changes or revocation, for each of the three types of authorization
- how different types of changes or revocations to authorizations could be addressed, including addressing the implications of such changes

Regarding functionalities for the AEF

The international registry shall provide functionalities for the prefilling of the AEF for the Parties that have accounts in this registry. This minimizes the burden on Parties. Moreover, the registry already has most of the information needed for preparing the AEF.

However, the EU would like to recall that in our view, the final version of the AEF can only be adopted once we have reached agreement on:

- the content, timing, and format of the 3 types of authorizations (see above and in the Annex below)
- the sequence of the reporting obligations
- key terms and concepts such as: use, cancellation, and retirement to ensure that these terms are used in a coherent manner
- a robust interoperability, transparency, accuracy, security and reliability of the registry system, in particular for registries that are not linked to the international registry to ensure that only reliable information is (automatically) uploaded in the AEF through the registry system.

Parties shall make arrangements to ensure that they have access to all necessary information to complete the AEF, including through exchange of information with A6.2 registries of other participating Parties, to ensure that Parties are able to report complete and accurate information. *The AEF cannot be relied upon to exchange such information between Parties,* as this would be too late to enable accurate and complete reporting on ITMOs.

The AEF should be structured with different sub-tables to ensure that information is easily accessible (e.g., with separate tables for different types of actions), that summary information for different types of actions is available, and that resulting obligations to apply corresponding adjustments are also clearly shown.

Where a first transferring Party has defined "cancellation or use" as the first transfer pursuant to paragraph 2b of the Annex to decision 2/CMA.3 and the "cancellation or use" occurs in the A6.2 registry of another Party, both the first transferring Party and the Party where the "cancellation or use" has occurred shall report in the AEF on the "use or cancellation".

In developing common nomenclatures pursuant to section II.B in Annex I to decision 6/CMA.4, unique elements (values) shall be assigned to all Parties, cooperative approaches, authorisations, actions in relation to ITMOs, A6.2 registries, activity types, sectors, and underlying registries used by cooperative approaches, in order to facilitate tracking and consistency of data in ITMO registries and the AEF.

For better understanding the content of the AEF, the EU has prepared a preliminary summary of the expected origin of the different data required for completing the AEF. The table is included in the annex to this submission.

Regarding 'first transfer'

Applying the same definition of 'first transfer' to all ITMOs authorized for use towards OIMP, makes accounting and reconciliation of corresponding adjustments simpler than if different definitions of 'first transfer' would apply to different ITMOs authorised by the same host Party. Moreover, as highlighted in previous submissions, further clarity is needed on the definition of 'first transfer' in cases where ITMOs are authorized for use towards NDCs and/or OIMP.

We therefore recommend that further guidance on Article 6.2, to be adopted by CMA5, clarifies that:

- Parties shall define the 'first transfer' pursuant to paragraph 2b of the Annex to decision 2/CMA.3 *as part of their authorization of the cooperative approach*, pursuant to paragraph 18g, in their initial report.
- A Party shall apply the same definition of 'first transfer' pursuant to paragraph 2b of the Annex to decision 2/CMA.3 to *all ITMOs authorized under a cooperative approach*.
- Where Parties authorize ITMOs for use towards either NDCs or OIMP, the first transfer should be the earlier point in time between
  - the international transfer of the mitigation outcome pursuant to paragraph 2a of the Annex to decision 2/CMA.3 and
  - the first transfer as defined by the first transferring Party pursuant to paragraph 2b of the Annex to decision 2/CMA.3.

Section 2: Functionalities for the CARP and A6 DB

Publicly availability of data

Regarding the implementation of the CARP by the secretariat, we recommend that the secretariat implements the following functions:

- In addition to the data that the secretariat proposes to keep in the CARP storage (figure 3 in the document [https://unfccc.int/documents/628727)](https://unfccc.int/documents/628727), *the AEF and the results of the consistency checks should be made publicly available in the CARP*.
- All the data should be publicly available *in a disaggregated manner, through extractions to be made by the secretariat* as requested in paragraph 36(a) of decision 2/CMA.3. Furthermore, detailed data and information should be easily searchable, so that it is possible to get, for example, information related to a Party, a cooperative approach or an ITMO.
- To keep transparency and trust in the system any inconsistencies in relation to ITMOs should be made transparent in the CARP. For each ITMO it should be possible to easily identify whether there are unresolved inconsistencies related to any reporting requirement, including the cooperative approach under which the ITMO was generated. The information should be updated as soon as the inconsistency is resolved.
- The CARP should have a special place for storing authorisations of cooperative approaches, authorisations of entities and authorisations of ITMOs in a disaggregated manner. These authorisations should also be searchable.

Common nomenclatures

Common nomenclature should be defined on many elements, to ensure that information reported by Parties is coherent and comparable and to facilitate the review process. In order to perform the consistency check, the A6 DB needs to be able to compare information on the cooperative approach, ITMOs and authorized entities, as reported by different Parties. Therefore unique identifiers are needed for certain types of data. Minimum elements for identifiers of ITMOs have already been defined (decision 6/CMA.4, annex I, paragraph 5). Identifiers for other data types still need to be defined.

Common nomenclature is needed, for example, for: cooperative approaches, host parties, sectors, activities, types of activities, registries and use purposes of authorized ITMOs.

Further clarification is needed on the process to establish common nomenclature as referred to in paragraphs 28 to 31 in annex I to decision 6/CMA.4.

The guidance proposed by the Secretariat in its Technical Paper on the CARP and A6 DB, document https://unfccc.int/documents/628727, is very valuable, and common nomenclature is one of the functional requirements of the CARP. We welcome the proposed approach and the participative process, allowing Parties to submit proposals for common nomenclature. However, we also note that some stability is needed and too many changes in the nomenclature should be avoided.

Use cases

The use cases for the CARP and the A6 DB should be evaluated by the Reg Admin Forum.

Consistency checks

The A6 DB should receive all the records from the Party reports needed for performing the consistency checks.

Each party in a cooperative approach should only report a specific action related to a specific cooperative approach once. However, each participating party in a cooperative approach may report the same action.

Section 3: Functional requirements for the international registry

At COP27 in Sharm El-Sheikh, Parties mandated the secretariat to implement the international registry and to develop technical specification for the international registry (paragraph 33 of decision 6/CMA.4). We believe that the draft technical specifications, published by the secretariat in document "Functional requirements and associated cost estimates for the international registry, v0.1.1, dated 02/06/2023" (unfccc.int/documents/628728), form a good and solid first basis. We believe, however,

that several improvements should be implemented to these specifications, as set out further below.

Procedures and minimum standards

We consider it important that the secretariat develops, in consultation with the forum of Article 6 registry administrators referred to in decision 6/CMA.4 paragraph 34, (hereafter referred to as 'the Reg Admin Forum'), procedures and common minimum standards (paragraph 33 (d) of decision 6/CMA.4) to ensure the *operational security* of the international registry, national registries and other registries used by Parties under cooperative approaches and to avoid financial fraud (e.g., money laundering). These standards should include due diligence to be performed by the international registry administrator and by Party administrators before authorizing access to the registry to any entity and include procedural arrangements to suspend or remove access.

Common Nomenclatures

Development of common nomenclatures is mandated in paragraph 17 (j) of decision 6/CMA.4. Some of the common nomenclatures are needed as standardized identifiers to ensure that the registries can function correctly and will make the A6 DB able to recognize the different data types and to conduct the consistency checks. The EU believes that it is important that the secretariat in consultation with the Reg Admin Forum develops standardized identifiers relevant for the registries and the A6 DB for key data reported by Parties and specific actions in the A6.2 registries.

Change Management

A set of common procedures and standards including for management of technical changes in the international registry is also needed. This require technical knowledge and should therefore be developed by the Reg Admin Forum and the secretariat.

Relationship between National and Underlying Registries

Where, as a result of the authorisation of units in an underlying mechanism or programmes, ITMO transactions are undertaken in an underlying registry, careful consideration is needed regarding security, trust, transparency & avoidance of double counting with respect to these transactions (i.e., through guarantees that the ITMO related information available in the national registry accurately reflects the transactions of underlying units authorised as ITMOS within and between the underlying registries).

Transfer between registries and tracking

At CMA 5 there should be given a clear mandate for parties to choose a registry system based on either 'pulling and viewing' or 'transfers' and the International Registry should provide for both solutions.

Transactions of authorized A6.4ERs from the mechanism registry to the international registry are defined in decision 6/CMA.4, annex I, paras. 9, 10, 23 and 24. National A6.2 registries should be able to connect to the Mechanism Registry to allow for transfers of authorised A6.4ERs to the national registries.

Authorized A6.4ERs that are transferred to the international registry shall maintain a reference to their original serial number. ITMOs that are based on authorized A6.4ERs

and generated through pulling and viewing of data from the mechanism registry shall include a reference to the serial number of the A6.4ERs

At a minimum, it should be possible to transfer authorized A6.4ERs from the Mechanism Registry to the International Registry and national A6.2 registries.

For tracking, transparency and to avoid double counting, each ITMO and A6.4ER, expressed as one tonne of CO_2 equivalent, should be clearly identified with a unique identifier, regardless of whether ITMOs are transferred as a block of units or as accounting amounts.

For tracking, transparency and to avoid double counting, where a cooperative approach is undertaken with respect to an underlying mechanism or mechanisms, the relationship of units issues, transferred or used in underlying registries, to the ITMOs issued or recorded, transferred or used in A6.2 registries should be clearly and consistently specified as part of the authorisation of the cooperative approach. Moreover, both underlying units and ITMOs should have an identifier for the relevant cooperative approach.

Where underlying units are directly authorised, and operation with respect to ITMOs are recorded and reported with respect to the issuance, transfer, or use of underlying units in underlying registries, we recommend that CMA5 guidance on Article 6.2 clarifies that Parties shall have arrangements in place with underlying registries to ensure that relevant registry data on the status of these units is made available to the Parties participating in the cooperative approach. The data should be provided in a standardized format.

A standardized format and respective protocols for pulling and viewing of data would reduce the administrative burden both for Parties, in particular if they make use of several underlying registries, and for the underlying registries, which may serve different Parties and cooperative approaches. The format should include, inter alia, information on the issuance, transfer, and retirement and cancellation of units. As this is highly technical, we recommend that the secretariat should develop the standardized format and protocols in consultation with the Reg Admin Forum.

Reconciliation mechanism

The EU agrees with the Secretariat in the considerations in document https://unfccc.int/documents/628728, page 17, to postpone a decision on whether to implement a reconciliation mechanism for reconciling transfers of ITMOs.

Registry administrator for the Mechanism Registry

In the document https://unfccc.int/documents/628728, it is indicated that the Mechanism Registry will have Party Specific Sections (section 2.1, page 11). It is, however, unclear if parties need to appoint a registry administrator for the mechanism Registry and need to manage the accounts in the Party's section of the Mechanism Registry. This needs to be clarified in the technical specifications described in document UNFCCC/SBSTA/2023/L.6, paragraph 13.

Accounts of the international registry

The international registry and national registries should have the same account types. A list of proposed accounts is included in the annex to this submission.

In the document https://unfccc.int/documents/628728 page 27, the secretariat proposes that an account may be bound to a maximum of one cooperative approach. As ITMOs can be referred to the cooperative approach via the unique identifier of the ITMO, the EU see no need for this limitation that might lead to a need for opening several accounts instead of one with a larger administrative burden for the Party and for participating authorised entities.

The EU recommends that the secretariat, in consultation with the Reg Admin Forum, should define the list of account types needed for the international registry.

Role of administrators

CMA.5 should adopt rules for the administrators' responsibilities.

Besides the responsibilities of the administrator of the international registry mentioned in decision 6/CMA.4, Annex I, paragraph 17, the registry administrator of the international registry should have the responsibility to keep the international registry secure and safe.

The EU supports the proposal by the Secretariat in the document https://unfccc.int/documents/628728 that the administrator of the international registry provides access to the administrators of parties using the international registry.

The EU recommends that each Party using the international registry, or a national registry, should appoint their own registry administrator to manage the section in the international registry specific for that party.

The secretariat, in consultation with the Reg Admin Forum, should define the responsibilities and obligations of the registry administrators. A proposal for these responsibilities and obligations is included in the annex to this submission.

Financing of the international registry

Once up and running, the infrastructure should be self-financing and paid for by users according to the level of demand they place on the system. It will be important to understand the level of demand for the international registry, before a decision is made on the level and scale of implementation.

The EU recommends that the cost estimates in the implementation plan mentioned in document UNFCCC/SBSTA/2023/L.6, paragraph 12 should separately specify the costs of implementation and operation of the international registry, the mechanism registry and/or the costs to parties of ensuring the interoperability between national and underlying registry systems. The paper unfccc.int/documents/628728 includes general cost considerations but lack information on the costs related to the different implementation solutions. This description should be extended to include estimates of

potential level of demand for registry services and associated costs, including costs for centralized and decentralized systems.

The EU prefers a structure that is cost-effective to implement and manage while keeping the functions and data of the different elements distinct. A shared platform for the Mechanism Registry and the International registry might fulfil these requirements.

Annex

Authorization

The authorization of a cooperative approach referred to in paragraph 18(g) in the Annex to decision 2/CMA.3 shall include at least the following minimum information:

1. the date of the authorization
2. the duration of the authorisation
3. whether the authorization could be changed or revoked and under which conditions
4. the authorizing Party, including details of the Party authority providing the authorization
5. a unique identifier for the cooperative approach
6. the Parties involved in the cooperative approach
7. the arrangements for authorising entities under the cooperative approach, as applicable
8. the authorised entities, as applicable
9. the definition of 'first transfer' by the Party for the cooperative approach, pursuant to paragraph 2b of the Annex to decision 2/CMA.3
10. a description of the cooperative approach including:
    a. its duration
    b. whether the cooperative approach entails the linking of cap-and-trade schemes, baseline-crediting approaches, or other types of cooperative approaches
    c. how the approach contributes to the NDC implementation, the long term LEDS (if any) and the long-term goals of the Paris Agreement
    d. how the risk of non-permanence is minimized and how the approach will ensure that reversals are addressed in full
    e. the sectors, greenhouse gases and type of mitigation actions involved in the cooperative approach
    f. whether the cooperative approach involves underlying registries or units, and if so, which ones
    g. the procedures and standards under which the cooperative approach is implemented

At least the following of the above data is needs to be tracked by A6.2 registries and be included in the A6 database: 2, 4, 5, 6, 8, 9.

The authorization of specific ITMOs shall at least include the following minimum information:

1. the date of the authorisation
2. the authorising party, including details of the Party authority providing the authorization

3. the mitigation activity
4. the sectors in which the mitigation outcomes are generated
5. the vintage year(s) of the authorized ITMOs
6. the global warming potential applied, as applicable
7. the unique identifier of the relevant cooperative approach
8. the purpose of the authorisation, being
   a. use towards NDCs, or
   b. use towards OIMP, or
   c. use towards NDCs and/or OIMPs
9. the amount of ITMOs authorised
10. the conditions at which the ITMO authorisation was provided
11. whether the ITMO authorization could be changed or revoked prior to the transfer of the ITMO to another Party or to an authorized entity, if certain conditions are not fulfilled
12. in the case of baseline-crediting approaches and the use of underlying unit registries, reference to the serial numbers of the underlying units
13. in the case of 6.4 ERs, a reference to the approval of the 6.4 mitigation activity

At least the following of the above data needs to be tracked by A6.2 ITMO registries and be included in the A6 database: 1, 4, 5, 7, 8, 9, 11, 12, 13.

The authorization of an entity shall at least include the following minimum information:

1. the authorising Party, including details of the Party authority providing the authorization
2. the date of the authorisation
3. the unique identifier of the relevant cooperative approach
4. the name, address and country of the authorised entity
5. the unique identifier of the A6.2 registry in which the entity may have an ITMO account and may transact ITMOs
6. the conditions at which the authorisation was provided, as applicable
7. whether the authorization could be changed or revoked and under which conditions

At least the following of the above data needs to be tracked by A6.2 ITMO registries and be included in the A6 database: 2, 3, 4, 5, 7.

The functionalities and procedures for the international registry

Accounts of the international registry (§17(h))

The international registry and national A6.2 registries should have at least the following accounts for each Party:

- At least one holding account
- An account for use of ITMOs toward the NDC of the Party. Units used towards NDC should be transferred into this account. Transfer out of the account should not be possible
- At least one account for use towards OIMP. Units used towards OIMP should be transferred into this account. Transfer out of the account should not be possible
- At least one account for voluntary cancellation. Units voluntary cancelled should be transferred into this account. Transfer out of the account should not be possible
- An Account owned by the Adaptation Fund to receive ITMOs for the purpose of providing a share of proceeds
- A cancellation account for the purpose of cancellation of ITMOs for OMGE. Transfer out of the account should not be possible.
- At least one account for administrative cancellations for other mandated purposes. Units cancelled for other mandated purposes should be transferred into these accounts. Transfer out of the accounts should not be possible.

Role of administrators (§17(h))

The administrator of each Party that uses the international registry should:

- manage the Party's accounts and obligations in the registry,
- perform the Party's transactions and actions in the registry,
- open and grant access to holding accounts to authorized entities,
- prefill the AEF (should technically be prefilled by the registry by initiation of the administrator)
- handle the security related to the accounts of the Party and authorized entities
- be responsible for the user management procedures, including due diligence.

The administrator of a Party that uses a national Article 6.2 registry should be responsible for:

- ensuring that the registry operates consistent with any decisions by the CMA and the technical specifications and other relevant published documents by the secretariat
- keeping the Party's registry secure and safe
- managing the Party's accounts in the registry
- performing the Party's transactions and actions in the registry
- opening and granting access to holding accounts to authorized entities
- prefilling the AEF
- handle the security related to the accounts of the Party and authorized entities
- be responsible for the user management procedures, including due diligence

Agreed electronic format (AEF)

The table below provides a preliminary overview of the possible origin of the data for the AEF (based on the Informal report on the hybrid workshop on the draft version of the agreed electronic format 02 June 2023, noting that the EU proposed substantial changes to the content and structure of the table).

Some data needs to be included manually by the registry administrator when recording a cooperative approach or an authorization in the registry ("manual entry" in the table below). This type of data will later be used by the registry to perform its functions and will be included in the prefilled AEF, as provided by the registry. Manual entries should, where possible, be made by choosing from a drop-down list with a common nomenclature.

Object	Origin	Comment
Party	Provided by the registry	
Reported year	Manual Entry	Registry Administrator enters the year, when creating the report
Article 6 database record	Provided by A6 database	This ought to be an internal A6 database record added to the AEF upon submission. This may not need to be included in the AEF table itself.
Cooperative approach (unique identifier)	Provided by the Party when authorizing the CA. Manual entry when first registering the CA in the registry. The ID could be created by the registry. The ID should be consistent across Parties participating in one cooperative approach.	The identifier is needed by all participating Parties as reference for all actions related to the CA
ITMO unique identifier (first and last number in the block)	Provided by the registry	The Identifier follows the ITMO throughout its lifetime
Underlying Block ID (start and end number in the block)	Provided by underlying registry. Manual or	The Identifier follows the ITMO throughout its lifetime

	automatic entry depending on registry system	
Metric and conversation factor	Provided by the Party when authorizing the ITMOs. Manual entry	Only used by the registry for prefilling the AEF
Quantity	Provided by the registry	Based on the amount included in the Block
First transferring party	Provided by the registry	Based on the data from the action in the registry. This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Vintage	Provided by the Party when authorizing the ITMO. Manual entry	This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Sectors	Provided by the party when authorizing the ITMO. Manual entry.	Only used by the registry for prefilling the AEF. This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Activity types	Provided by the party when authorizing the ITMO. Manual entry.	Used by the registry for prefilling the AEF. This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Date of authorization	Provided by the party when authorizing the ITMO. Manual entry.	Used by the registry for prefilling the AEF. This information should be a descriptor that is propagated across registries when the ITMO is transferred.

Authorisation ID	Provided by the Party when authorizing the ITMO. Manual entry when registering the authorization in the registry.	This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Purpose of the authorization	Provided by the party when authorizing. Manual entry when registering the authorization in the registry.	This information should be a descriptor that is propagated across registries when the ITMO is transferred.
OIMP authorised by the party	Provided by the Party when authorizing the ITMO. Manual entry when registering the authorization in the registry	This information should be a descriptor that is propagated across registries when the ITMO is transferred.
First transfer definition	Provided by the party when authorizing the cooperative approach. Manual entry when registering the CA in the registry	This information should be a descriptor that is propagated across registries when the ITMO is transferred.
Action date	Provided by the registry	Based on the data from the action in the registry
Action type	Provided by the registry	Based on the data from the action in the registry
Transferring and acquiring participating party	Provided by the registry	Based on the data from the action in the registry
Purpose for the cancellation	Provided by the registry	Based on the data from the action in the registry
Using participating Parties or authorised entities	Provided by the party when authorizing the ITMOs or entities. Manual entry when registering the authorization in the registry.	This information should be a descriptor that is propagated across registries when the ITMO is transferred.

| First transfer | Provided by the registry | Based on the data from the action in the registry |