



**SUBMISSION BY GUATEMALA ON BEHALF OF THE AILAC GROUP OF COUNTRIES - CHILE,
COLOMBIA, COSTA RICA, HONDURAS, GUATEMALA, PANAMA, PARAGUAY AND PERU
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**Views on functional requirements for the Centralized Accounting and Reporting Platform,
the Article 6 database and the International Registry**

Introductory Remarks

1. Following the invitation by the Secretariat, AILAC welcomes the opportunity to provide views on the documents prepared by the Secretariat in response to paragraphs 26 and 33(c) of decision 6/CMA.4: “Functional Requirements for the Centralized Accounting and Reporting Platform and the Article 6 database” and “Functional Requirements and Associated Cost Estimates for the International Registry”. In particular:
 - a. Functional Requirements for the Centralized Accounting and Reporting Platform;
 - b. Functional Requirements for the Article 6 Database and;
 - c. Functional Requirements for the International Registry.

Centralized Accounting and Reporting Platform

2. It would be useful to differentiate within the documents the kind of information and publications that each type of user (Party User, Secretariat User, Article 6 TER Reviewer, Public User) will have access to, at least while countries define this under the UNFCCC negotiation process.
3. It is important to provide further clarity on the availability of the Article 6 TER report to Public Users, specifically the timing of when it will be made available and upon which, if any, conditions it will be made available.
4. The Centralized Accounting and Reporting Platform (CARP) houses or provides all the items listed in decision 6/CMA.4 paragraph 27, which according to sub-paragraph (g) includes a public interface. In the document that contains the functional requirements for the CARP and the Article 6 database, section 3.3.1.4 describes a functionality that enables the public to export non-confidential data of reports submitted by Parties from the aforementioned public interface. AILAC would like further clarity on how this information would be presented. For instance, if the non-confidential data will be presented using the same format of the Article 6 database or the Agreed Electronic Format or will be using other multiple formats to visualize the information, for example, organize it by report provided by each Party or by cooperative approach. If the information will be presented by cooperative approach, if the information will be presented in a single format (summarizing the information) or detailing the information by each country involved in the Cooperative Approach.
5. Under section 3.1.3.1-PRE010 on the preparation of a new report, it is required to define who is the “other user” and what will be the scope.

6. It is necessary to have a manual for Party Users to enable the understanding of how countries will interact with the platform and what are the requirements needed prior to the interconnection enabled by the Application Platform Interface (API).

International Registry

7. After the Secretariat finishes the definition and further details regarding the access from each different type of user, it is necessary to have a manual user for the Parties to enable the understanding of how countries will interact with the platform and what requirements need to be fulfilled prior to the interconnection.
8. After the DNA is defined, further clarification is needed on how to request the user account, who approves it and gives the credentials, and how long will this process take.
9. Since some of the information is going to be qualitative, AILAC would like further clarification on how this information will be submitted, and whether it will be directly manual (online) or through a format to be uploaded.
10. AILAC would like to know if there will be interfaces that enable the uploading of quantitative data for the transfer of information to the Art.6 database and what kind of information will be required.
11. In regards to the section on transaction account types, it is important to take into consideration that other Parties have mentioned other types of accounts to facilitate the process of unit transferring.
12. It is not specified how the information of the units will be transparently tracked depending on the different case scenarios such as if a Party A:
 - a. Transfers to various parties
 - b. Transfers repeatedly to the same party
 - c. Transfers to Party B and then Party B transfers to Party C
 - d. Cancellations for other international mitigation purposes
13. AILAC sees that it is necessary to include data flow diagrams in the annex. These would facilitate the understanding on how the information will flow from one platform to the other and to verify and understand functionality.
14. We see that its relevant to create a security protocol for data loss prevention.

Article 6 Database

15. Further clarity on how information will flow from the Article 6.4 Mechanism to the International Registry by filling out the Agreed Electronic Format (AEF) is needed.
16. AILAC sees that including data flow diagrams in the annex is needed. These would facilitate the understanding on how the information will flow (from the input of data to the review and inconsistency solving).



17. Section 3.7.3 of the document addresses the “Article 6 Database Consistency Check Process”, it states how partial data is available is labeled, however there is no information as to where this notification will be received or to whom it will be made available.

General comments

18. AILAC would like to see how the periodic information will be requested, if not directly exported from the BTR database.