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# AUTHORISING ARTICLE 6.4 CARBON CREDITS

Guidance

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Authorising Article 6.4  
carbon credits

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#### Disclaimer

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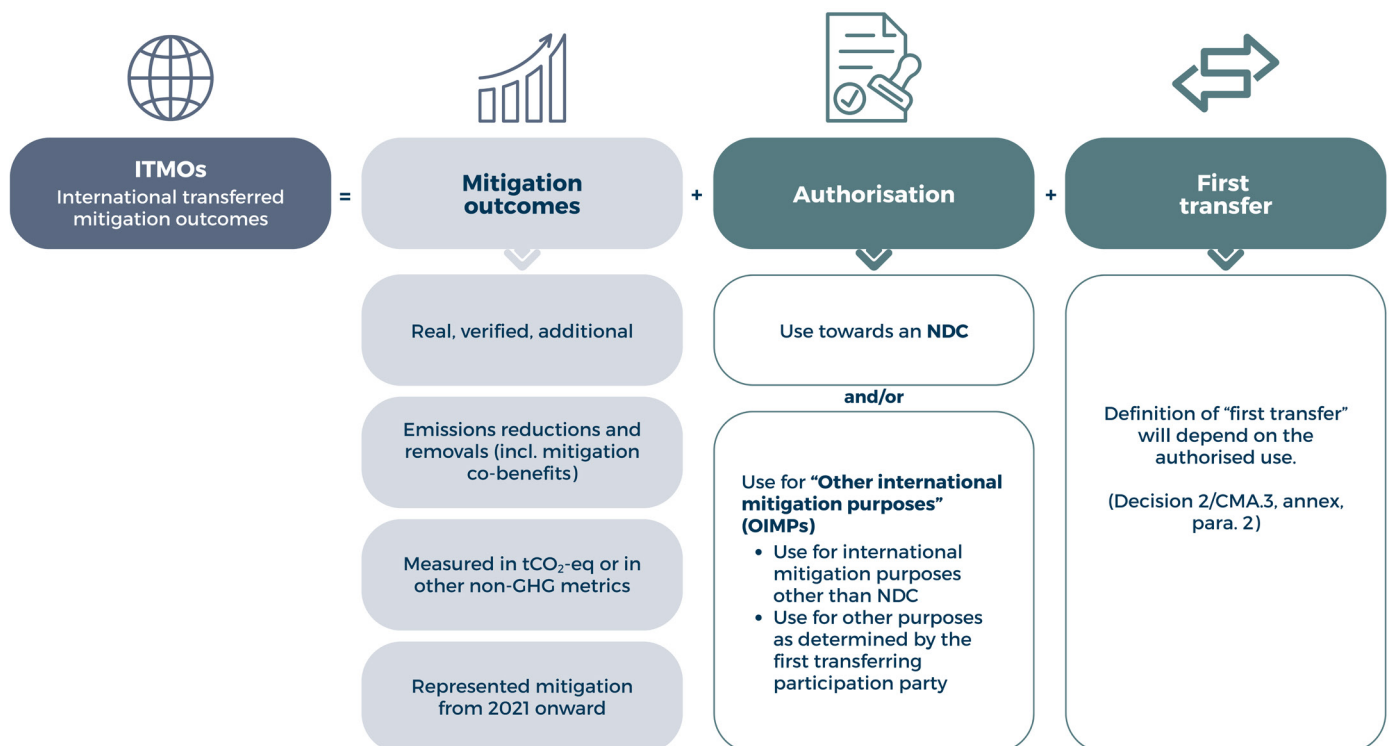
# 1. Introduction

As Article 6-backed carbon markets enter full implementation, host countries are facing growing pressure from project developers to provide an authorisation of the resulting mitigation outcomes (emission reductions or removals). Article 6 authorisation determines which mitigation outcomes may be first transferred by the host country as Internationally Transferred Mitigation Outcomes (ITMOs).

- Use toward other countries' Nationally Determined Contributions (NDCs)
- Other International Mitigation Purposes (OIMP) such as for compliance with the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) or voluntary uses

The Article 6.2 guidance defines an ITMO as an authorised and first transferred mitigation outcome. The Article 6 authorisation provides for additional use cases of mitigation outcomes and requires host countries to avoid double-counting by applying corresponding adjustments (CAs) to their emissions balance. This means that the host country excludes the associated mitigation from being counted towards its NDC, thus enabling it to be counted uniquely by the buyer towards its targets or other purposes. The trigger for applying CAs is the first transfer. The authorisation must be granted before a first transfer can occur, as the two are separate and sequential actions.

Figure 1: Definition of an ITMO



Source: Adapted from A6IP 2025

This raises practical questions for host countries regarding the criteria to be used when assessing whether to provide authorisation. While both Articles 6.2 and 6.4 rules clearly specify the requirements for authorisations and the authorisation statements, uncertainties remain about how to operationalise the relationship between a carbon market activity and the host country's NDC.

In practice, even countries with mature national Article 6 frameworks have so far been hesitant to provide an Article 6 authorisation.<sup>1</sup> This should be embraced, as it indicates that most host countries are taking their NDC targets seriously and want to avoid overselling ITMOs. At the same time, this situation has limited the supply of ITMOs even as compliance demand is expected to increase from NDCs and CORSIA.

An emerging source of ITMO supply is the Paris Agreement Crediting Mechanism (PACM) established under Article 6.4 of the Paris Agreement. The mechanism's oversight body, the Supervisory Body of the Article 6.4 mechanism (SBM) has recently registered its first activities (transitioning activities), adopted many regulatory standards, procedures and tools, and is expected to soon issue the first Article 6.4 emission reductions (A6.4ERs), Article 6.4 carbon credits.<sup>2</sup> Although no new activities have been registered yet due to the availability of only one approved PACM methodology<sup>3</sup>, it is noteworthy that a significant portfolio of transitioning activities from the Clean Development Mechanism (CDM) enables a 'fast start' of the PACM. This means that a significant number of activities may be registered quickly, but also that A6.4ER issuances from these transitioning activities will rapidly increase. Numerous transitioning activities have already accumulated mitigation outcomes for the period 2021-2025, years that fell outside the CDM's pre-2020 issuance scope.

In anticipation of these developments, the purpose of this guidance is to explain host country authorisation of A6.4ERs. It offers practical guidance for host countries on how to make informed decisions when providing authorisation as a first step toward avoiding double-counting of mitigation outcomes through CAs.

This booklet focuses on the authorisation of A6.4ERs, which cover two types of PACM units:

### **Authorised Emission Reductions (AERs)**

Authorised A6.4ERs represent authorised and internationally certified units that can be used for meeting buyer countries' NDC targets and for OIMP. AERs are ITMOs, and once authorised, they must follow the Article 6.2 accounting and reporting requirements.

### **Mitigation Contribution Units (MCUs)**

Non-authorised A6.4ERs that can be used for results-based climate finance, domestic mitigation pricing schemes or domestic price-based measures.

Next to the authorisation of mitigation outcomes, Article 6 also recognises other types of authorisations such as the authorisation of entities, which will not be the focus of this guidance. Also, this guidance focuses on PACM as a specific carbon crediting programme while acknowledging that other carbon market approaches can also generate ITMOs and that market demand seems to converge towards a preference for authorised credits.

<sup>1</sup> As of October 20, 2025, 32 letters of authorisation have been issued by host countries (IETA 2025); while 62 host countries have identified national authorities responsible to provide authorisation (A6IP 2025).

<sup>2</sup> A6.4ERs include both emission reductions and removals

<sup>3</sup> In a major step forward, SBM 019 in October 2025 approved the first PACM methodology for the waste sector, with others for renewable energy and clean cooking expected to follow in subsequent meetings.

## 2. Distinguishing host country approval and authorisation under PACM

As ITMO authorisation is a new concept in international carbon markets, it is important to clarify the distinction between **Article 6.4 approval of PACM activities** and **authorisation of mitigation outcomes**:

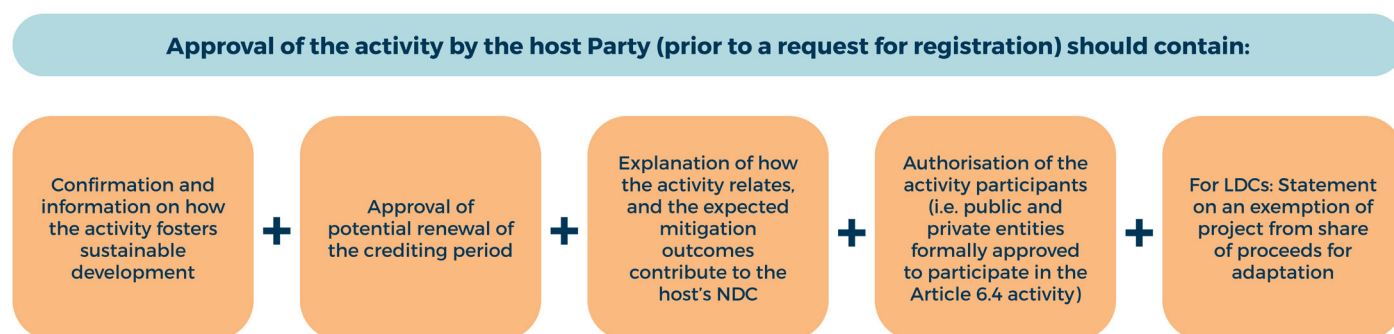
- **Article 6.4 approval** is the formal process early in the activity cycle by which a host country approves a mitigation activity prior to registration with PACM.
- **Authorisation** is the formal process by which the host country commits itself to apply CAs to its annual emissions balance for specific mitigation outcomes (A6.4ERs in this case) that will be transferred internationally.

In practice, a mitigation activity may be approved by the host country and registered with PACM, but resulting mitigation outcomes only become eligible for NDC or OIMP uses if the host country authorises them.

### 2.1. Approval of Article 6.4 activities

The host country's approval of an Article 6.4 activity is a key step in the PACM activity cycle (see Figure 3), and a mandatory precondition for registration with the PACM. Through approval, the host country grants its consent for a project to proceed toward PACM registration based on information provided in the activity design documents as described in Figure 2.

Figure 2: Requirements for an A6.4 activity approval

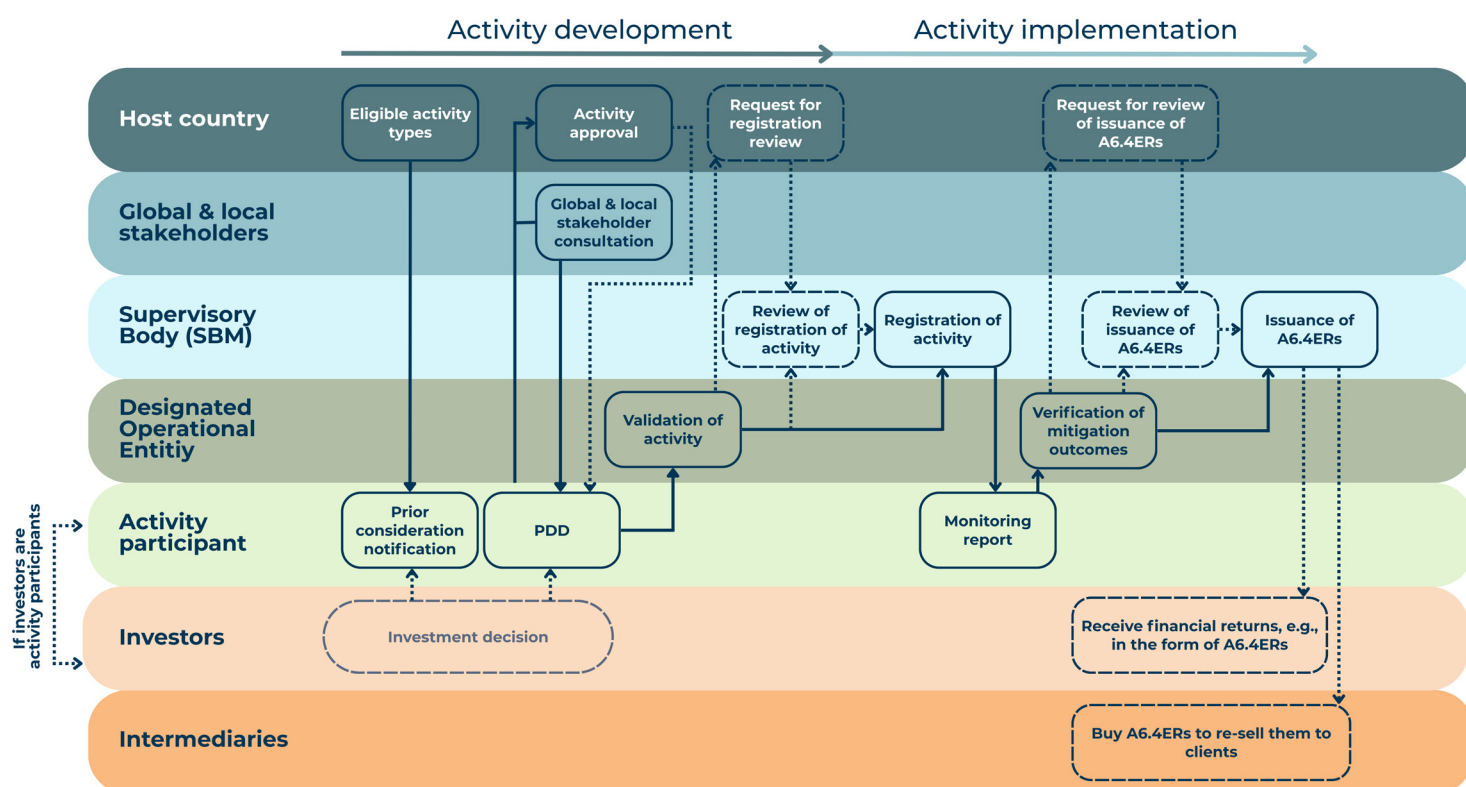


Source: Authors based on UNFCCC 2025a

As part of activity approval, the host country is required (UNFCCC 2025a):

- To confirm and inform how the activity fosters sustainable development
- To approve the potential renewal of the crediting period
- To explain how the activity relates and the expected mitigation outcomes contribute to the host country's NDC
- To authorise the activity participants engaging in an Article 6.4 activity.

Figure 3: PACM activity cycle with host country approval



Source: Authors

Host country approval ensures the alignment of PACM activities with national climate and sustainable development goals. It is worth noting that activity approvals can only be granted once Parties have completed the Article 6.4 participation forms, which 38 countries have done as of November 2025 (UNFCCC 2025b).

For eligible CDM activities transitioning to PACM, host country approval of the transition of an activity is an equivalent step to approvals for new activities in the activity cycle. However, for eligible activities seeking transition from CDM to PACM, host countries will need to provide approval of transition until 30 June 2026; otherwise, the activity cannot be registered under PACM anymore.

As activity approval is a separate step from host country authorisation of A6.4ERs, granting host country approval of a new Article 6.4 activity or transitioning a CDM activity does not automatically imply that the resulting A6.4ERs will be authorised and become ITMOs at a later stage.

## 2.2. Host country authorisation statement

The host country authorisation statement of A6.4ERs is defined in the Article 6.4 rules, modalities and procedures (RMP) and reflected in the PACM's activity cycle procedure and is also linked to the Article 6.2 guidance. The Article 6.4 authorisation statement determines whether A6.4ERs are authorised for the following use case or for a combination thereof:

- for another country's NDC achievement, and/or
- for international mitigation purposes (e.g., CORSIA), and/or
- for other purposes (e.g., voluntary mitigation action)



The UNFCCC Secretariat has provided specific templates which must be used for the Article 6.4 authorisation statement (UNFCCC 2025c; UNFCCC 2025d):

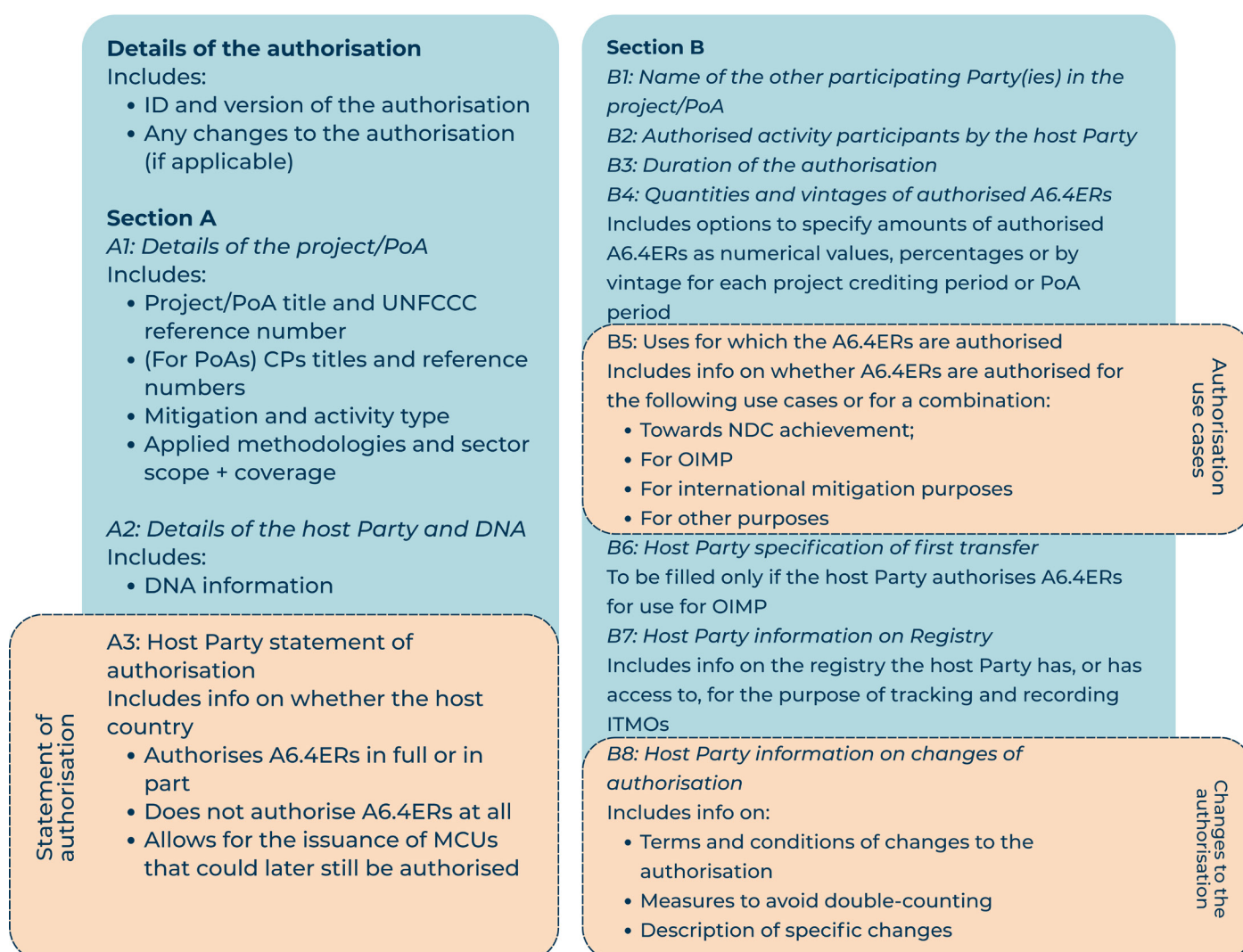
- [Template for projects](#)
- [Template for programmes of activities](#)

It contains all applicable content elements required by the Article 6.2 guidance on the content of authorisation (UNFCCC 2025c). Next to these, the statement must include information on whether the host country (UNFCCC 2025e):

- Authorises A6.4ERs in full or in part
- Does not authorise A6.4ERs at all
- Allows for the issuance of MCUs that could later still be authorised


Figure 4 provides an overview of the content included in the Article 6.4 authorisation statement.

Figure 4: A6.4ERs authorisation form details



Source: Authors based on UNFCCC 2025c; UNFCCC 2025d





If the host country authorises the A6.4ERs, in full or in part or at a later stage – the authorisation statement must specify the authorised uses, such as toward NDCs, for OIMP, or a combination thereof. The host country may, at any time, submit a revised statement of authorisation. However, such revisions must not apply to or affect any A6.4ERs that have already been transferred into or out of the mechanism registry. The only exception for modifications after a transfer in or out of the registry applies when such changes are specified in the applicable terms and conditions and a process for such changes was clearly defined in section B.8. of the authorisation statement (UNFCCC 2025a).

Host countries should clearly define the applicable terms and conditions and process for such changes. This offers transparency and avoids the risk of double-counting, as well as providing greater clarity on associated risks, thereby enhancing the financial viability of projects. Developers can plan confidently, and investors are better positioned to assess and finance PACM activities.

### First transfer

The specification of the ‘first transfer’ is significant, as this is the point at which AERs become ITMOs and CAs must be applied. While NDC use of ITMOs has a clearly defined point of application, OIMP use provides host countries with three distinct options (UNFCCC 2022):

- If A6.4ERs have been authorised for use towards an NDC, ‘first transfer’ is **the first international transfer of the AERs**, typically into the holding account of a buying Party, public or private entity within the mechanism registry or outside (e.g., Party registry)<sup>5</sup>.
- If A6.4ERs have been authorised for OIMP, the host country must specify whether ‘first transfer’ is specified as **(1) the authorisation, (2) the issuance, or (3) the use or cancellation of the AERs**.

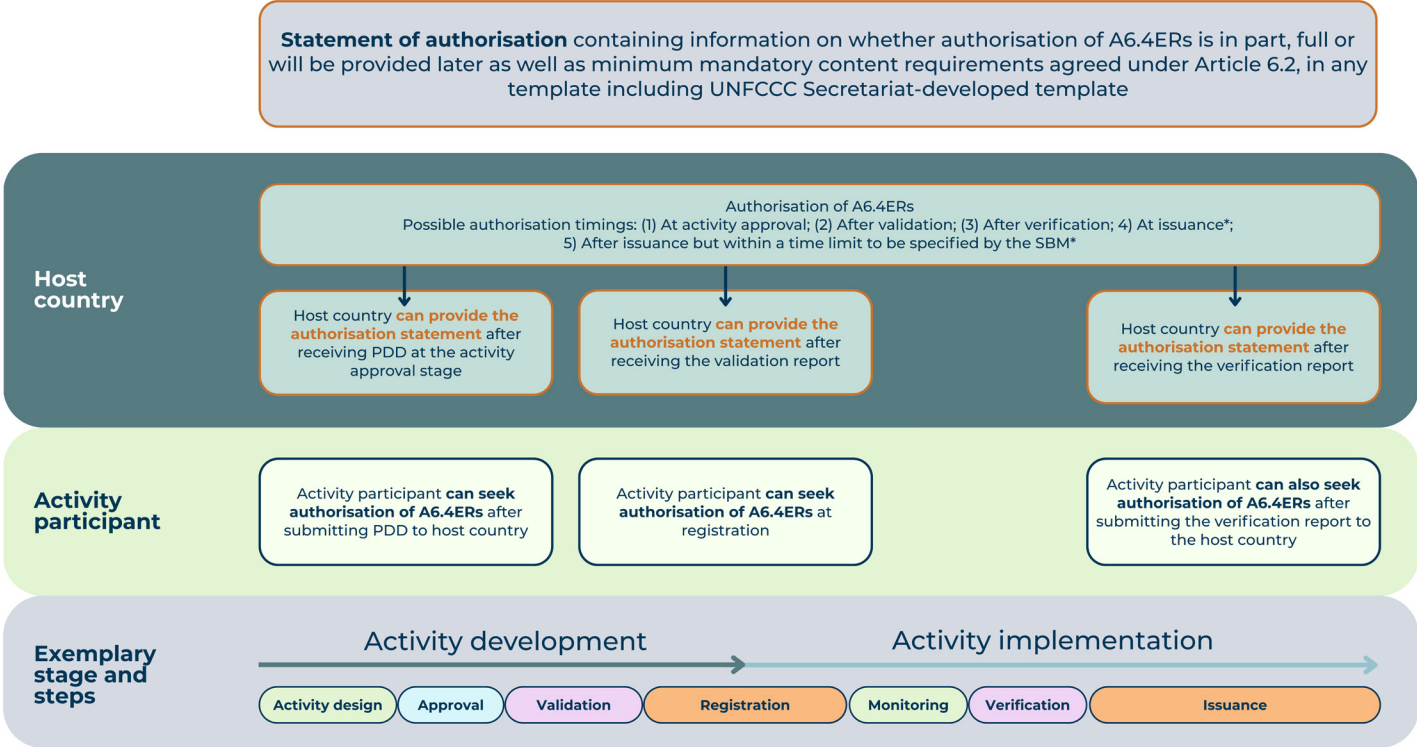
AERs must be labelled with both their unique identifier and their first transfer status. The latter will also be streamed on the UNFCCC website.

### Timing of the authorisation statement

In addition, the **timing of the authorisation statement** is important for market practitioners as there is a price differential for authorised carbon credits. Host countries must provide a formal statement of authorisation on the use of the A6.4ERs “as early as possible but prior to the first issuance of A6.4ERs” through a dedicated interface on the UNFCCC website (UNFCCC 2025a). If the host country allows MCUs to be issued pending a future decision on authorisation, it can later issue a revised statement to be submitted to the SBM once it chooses to authorise them. The condition for doing so is that it occurs before any transfer of the MCUs in question in or out of the mechanism registry, and that the MCUs are still held by the activity participants and participating Parties involved at that point of time (UNFCCC 2025a). A potential time limit for providing the revised authorisation statement after issuance might still be determined by the SBM based on practical experience gained (UNFCCC 2025f). Figure 4 outlines the authorisation process within the PACM activity cycle.

<sup>4</sup> The mechanism registry enables A6.4ERs to be moved between holding accounts, and to retirement or cancellation accounts, by Parties or authorised public or private entities. It also supports transfer-ring AERs from the mechanism registry to the international registry and to any participating Party’s registry linked to the mechanism registry.

Figure 5: Authorisation process within the PACM activity cycle



\*at and after issuance but prior to any transfer of A6.4ERs in or out of the mechanism registry is only possible if an authorisation statement was provided prior to the first issuance of A6.4ERs indicating that it may authorise issued MCUs at later stage.

Source: Authors

An early-stage authorisation is attractive for ITMO buyers but would require host countries to make decisions based on preliminary information. Authorisation later in the activity cycle would allow host countries to base their decision on more accurate information, while activity developers and buyers would need to accept a longer period of uncertainty about the activity’s authorisation status, potentially undermining investment decisions.

The authorisation allows the buyer to use the credits for additional use cases (e.g., NDC or CORSIA use). The authorisation thus safeguards the integrity of specific use cases. From the host country’s perspective, an authorisation represents its confirmation that the credits ensure environmental and social integrity. This highlights the importance of careful decision-making by the host country when it comes to authorising A6.4ERs and ensures that all carbon market activities align with national and international environmental goals.

Reporting on authorisation

The authorisation of A6.4ERs triggers the reporting obligations under Article 6.2 guidance of the Paris Agreement. Once a host country has authorised the use of A6.4ERs, it must submit an Initial Report followed by Annual and Regular Information.

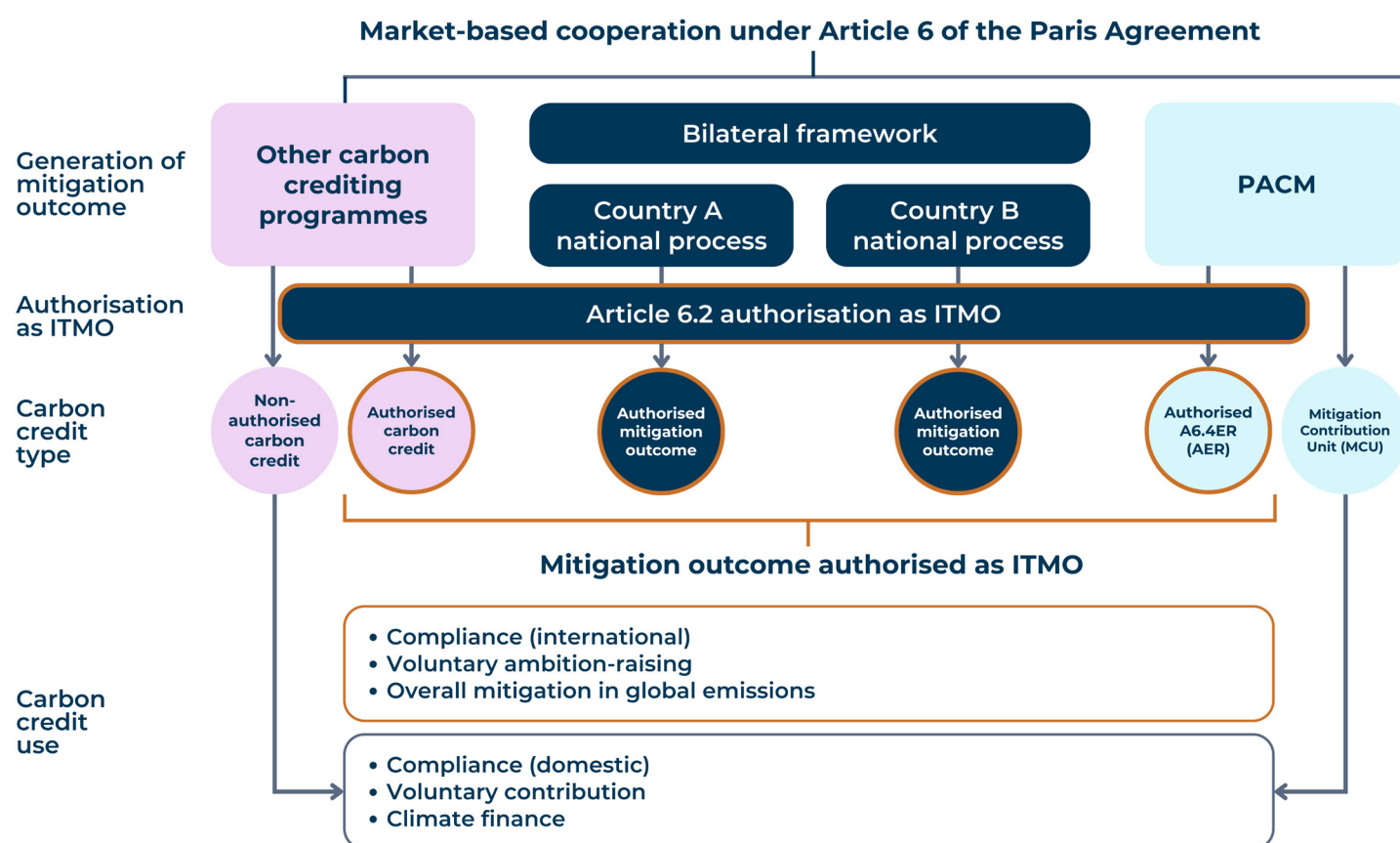
## 2.3. Mitigation contribution units

To prevent overselling, so as not to jeopardise achieving NDC targets, countries may also choose not to authorise A6.4ERs for international transfers. Non-authorised A6.4ERs, MCUs, cannot be used to meet other countries' NDC targets and cannot be used towards international mitigation purposes. Instead, such non-authorised credits can be used for other purposes. MCU use cases can include:

- Voluntary contributions to national targets, e.g., by voluntarily cancelling MCUs
- Compliance use under domestic schemes, e.g., a domestic tax scheme that allows the surrendering of domestic carbon credits for tax obligations
- Delivery of results-based climate finance to the host country by voluntarily cancelling MCUs

To which extent MCUs contribute to the host country's NDC depends on its inventory granularity and NDC scope. Where MCUs are visible in the host country inventory and within the scope of the NDC, they contribute to the host country's NDC target.

Figure 6: Overview of use cases of mitigation outcomes



Source: Adapted from Ahonen et al. 2023

### 3. Key considerations of Article 6 authorisations for host country NDC targets

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As host countries are coming under increasing pressure from market participants to provide authorisation, a clearer common understanding how host countries can assess authorisation requests would be beneficial. Even in host countries with established legal and/or institutional frameworks for Article 6, there may be a procedure for authorisation which often lacks transparent criteria, or criteria grounded in national (climate) policy instruments or regulations.

As described above, Article 6 rules specify the required elements of authorisation statements. Articles 6.2 and 13 detail accounting and reporting practices through CAs in biennial transparency reports (BTRs). However, a crucial open question related to ITMO authorisation is how host countries should assess the relationship between a carbon market activity and their NDC as a basis for determining whether the resulting carbon credits should be authorised as ITMOs. This challenge is amplified by the unresolved question of what a CA means for achieving the conditional NDC targets of the host country. Articles 4, 6, and 13 do not mention the conditionality of NDC targets; however, many developing countries have chosen to use this demarcation to express their need for international support for achieving their ambition.

According to the latest UNFCCC synthesis report, **67% of all newly revised NDCs include conditional elements**, in particular more ambitious mitigation targets that depend on international support (UNFCCC 2025g). Most countries generally refer to the availability of finance, capacity building and technology transfer as conditions. Yet, some explicitly refer to the availability of market-based mechanisms for being able to achieve their NDC targets. The synthesis report also finds that an increasing number of Parties indicate their intention to participate in voluntary cooperation under Article 6 of the Paris Agreement. Among newly updated NDCs, 89% indicate their general interest while 72% explicitly refer to ITMO transactions (either as sellers or buyers). Only 5% of Parties explicitly establish that they intend to use Article 6 as a means of achieving conditional mitigation targets, whereas most generally mention that voluntary cooperation will be aligned with the Article 6 rules and related CMA decisions (UNFCCC 2025g).

This demonstrates that the **current generation of NDCs remains insufficiently clear or inconsistent on how Article 6 can be used for achieving conditional and potentially unconditional NDC targets**. Therefore, this section explores the possibility of establishing a clearer understanding of how NDC targets should be considered in host country assessments of whether to authorise mitigation outcomes. There have been previous attempts to categorise distinct types of conditionality in NDC targets (Strand 2017, ECBI 2020, Day et al. 2016). Strand (2017) distinguishes conditionality as measures being i) conditional on international financial and/or technical support; and ii) conditional on climate-related policies pursued by other countries. ECBI (2020) and Day et al. (2016) complement this with further categorisations: iii) conditional on the rules of engagement (i.e., availability of market-based approaches to fulfil contribution); and iv) conditional on national circumstances. However, a clear understanding of how NDC conditionality impacts the use of carbon markets remains elusive and requires further elaboration (Greiner et al 2021).

Generally, it seems to be broadly accepted that unconditional NDC targets are to be achieved by the host country with domestic resources. Conditional NDC targets are typically understood to be contingent on finance, capacity building, and technology transfer provided by developed countries. This differentiation was introduced primarily by developing countries to highlight their need for financial support in achieving more ambitious climate goals. The Oxford Principles for responsible use of Article 6 support this interpretation as they establish that international carbon markets should be used for going “beyond unconditional climate mitigation” (Johnstone et al. 2025). However, this view has not been universally accepted. In an analysis of the relationship between NDC target conditionality and Article 6 focused on Africa, Greiner et al. (2021) found that countries employed different interpretations of target conditionality, with some NDCs classifying ongoing carbon market activities as part of unconditional targets.

Such differences in interpretation seem unavoidable given the ‘nationally determined’ nature of NDC targets and features. Therefore, countries should not formally be excluded from Article 6 cooperation based on their current interpretation of NDC features, including conditionality. One should also not set any perverse incentives to set artificially low unconditional NDC targets to have a higher share of conditional mitigation potential available for international transfer. Still, working towards a common understanding of how to deal with NDC target conditionality and ITMO authorization is crucial for improving transparency and robust Article 6 governance. Therefore, a starting point for further discussion and exchange could be to put forward proposed core principles for good practice for how Article 6 can support NDC targets:

**Unconditional NDC targets should not generate ITMOs** as the purpose of defining unconditional measures is that these do not depend on international support. Carbon credits that are used by the host country domestically such as MCUs could still contribute to achieving unconditional targets.

**Conditional NDC targets may generate ITMOs** if additional activity level assessments (such as through the PACM activity cycle) find that all Article 6 requirements have been met. This allows host countries to rely on the capacities of the PACM if they are not establishing their own national requirements for engaging in bilateral cooperative approaches.

**Conditional NDC targets should be considered achieved even if corresponding adjustments have been made for ITMO transfers from mitigation outcomes within the conditional NDC target.** Carbon market activity cycles demonstrate that ITMOs are based on real, permanent and additional mitigation outcomes. This means that no other type of international support was available for the activity generating the ITMO. The host country has made clear that the mitigation is conditional on international support, and carbon markets are a widely recognised policy instrument for delivering such support.

**If a country has not demarcated unconditional and conditional NDC targets, countries may choose to define quantified caps on ITMOs for sectors as defined by IPCC inventory guidance, based on GHG inventories used for the BTR.** This would allow for a comparative assessment whether the country has been exporting a “fair share” of the available mitigation potential or whether there may be a risk of overselling that weakens the ambition of the NDC.



While these proposals seem simple, their operationalisation will be challenging. NDCs are often formulated at high levels of sectoral aggregation and with single-year targets, which may often require additional steps for host countries. Therefore, converting single-year targets into annual emissions budgets and then demarcating which quantities belong to conditional NDC target scopes may not be a straightforward exercise. However, these NDC accounting questions need to be resolved in any case for BTRs aligned with the Enhanced Transparency Framework. **Ongoing and future NDC updates may use more disaggregated conditional mitigation potentials, with the potential for ITMOs transparently demarcated.**

In addition, **countries can also choose to provide more clarity with measures such as developing positive lists that contain activity types the country intends to authorise for international transfers.** Such lists would ideally put forward aggregated or disaggregated total quantities of potential ITMO exports. They may also evolve by adding or deleting certain activity types based on the additionality of these activity types. Criteria for assembling such lists may include:

- Showing that their mitigation costs exceed a pre-defined level (e.g., through marginal abatement cost curves), in order to prevent the sale of “low hanging fruit”.
- Show that the emissions and/or removals attributed to the activity are reflected in the national GHG inventory report
- Facilitate transition towards a net-zero economy
- Incorporate the best available technology

Moreover, national carbon market frameworks and sectoral policies may define more clearly the potential scope and quantity of potential ITMO transfers. This could also be an enabling factor for upscaled or policy crediting, which has so far not yet been explored in the PACM but may become more relevant in the future.

While the Article 6 rules do not address the distinction between conditional and unconditional targets, some processes under the Convention do touch on it to a certain extent. The Article 6 Technical Expert Review (TER) of reports submitted under Article 6.2 cooperative approaches considers the activity's contribution to the host country's NDC implementation and assesses whether it ensures that there is no net increase in global emissions during the NDC implementation period. As of October 2025, 17 Initial Reports and one Updated Initial Report have been submitted, of which five Initial Reports have already undergone review (UNFCCC 2025h).

The first Article 6 TER conducted in 2025 revealed the following:

- The TER team frequently identified inconsistencies (UNFCCC 2025i,j) regarding how carbon market cooperation contributes to the implementation of a country's NDC and its long-term low-emission development strategy (LT-LEDS). During the review process, the reviewers often requested additional information from countries to clarify this linkage. When a country indicated that the mitigation activity in question fell under a conditional NDC target requiring carbon market support, this was generally considered sufficiently transparent, and no inconsistencies were raised in this regard (UNFCCC 2025k,l). The review team noted that, specifically on the contribution to the LT-LEDS and long-term goals of the Paris Agreement, further information would be required in the future (UNFCCC 2025i,j,k).

- On ensuring no net increase in global emissions within and between NDC periods, the TER team also identified inconsistencies (UNFCCC 2025i, k), asking the countries to include further information in the future on how exactly this is ensured. During the review process, the Government of Ghana provided additional information explaining that its framework allows authorisation only for ITMOs generated from activities under the conditional NDC target or those included in the national GHG inventory, ensuring that only mitigation outcomes surplus to the unconditional target are transferred. This information, along with details on the three measures to prevent overcrediting, was found to be sufficiently transparent.

## 4. Conclusions and recommendations

The guidance demonstrates the relevance of host country authorisation for Article 6-backed international carbon markets, focusing on the PACM. The lack of supply of fully authorised credits is indicative, on one hand, of an ongoing process of host countries translating multilateral Article 6 rules into national frameworks and legislation, which takes time. On the other hand, there are unresolved open questions that further complicate this process that require attention and clarity. To advance the implementation of carbon markets, therefore, we provide the following recommendations:

National Article 6 frameworks should prioritise authorisation: Establishing clearly defined criteria and procedures. This may include positive lists indicating which activity types will be authorised automatically or with high probability.

Ongoing and future NDC updates should more clearly identify Article 6 potential, demarcate unconditional and conditional targets, and the intent to authorise mitigation outcomes more clearly. Additional guidance under PA Articles 4 and 13 may be required to enhance clarity and transparency of the information provided in NDC related to Article 6.

Countries require substantially more capacity building, generally for a better understanding how Article 6 can strengthen the ambition of their NDC without undermining its environmental integrity. In addition, capacities on defining and executing authorisation procedures should be a short-term priority of capacity-building efforts. Compliance buyer countries, especially, have an incentive to ensure that host countries have robust accounting and reporting procedures to minimise political risks.

Related, there should be a consultative dialogue process of at least a smaller group of countries that works towards defining a better understanding of the relationship between the conditionality of NDC targets and Article 6, with a focus on supporting host Parties in their decision-making regarding ITMO authorisations. This could be a future priority, especially of sovereign carbon buyers that have an interest in robust frameworks and procedures.

Host countries should embrace the new feature of being able to use MCUs as an opportunity to catalyse domestic demand for carbon credits by host countries in support of their NDC, either through a domestic voluntary carbon market or carbon pricing instruments, or through results-based climate finance. Crucially, MCUs allow countries to fully use the PACM activity cycle and infrastructure, which substantially reduces transaction costs and capacity requirements compared to setting up domestic crediting mechanisms.

More work is needed on corresponding adjustments and related host countries' NDC accounting (defining annual carbon budgets) to better understand the accounting implications of providing authorisation for ITMO transfers.



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