

**To avoid climate catastrophe the UNFCCC Supervisory Body of Article 6 paragraph 4 of the Paris Agreement must recognize that the world no longer has time for misplaced reliance on market-based emissions trading systems and offset mechanisms**

8 July 2024

Dear Supervisory Body, Co-Chairs and Secretariat of Article 6, paragraph 4 of the Paris Agreement,

As the Supervisory Body of Article 6.4 convenes to discuss key areas of the global carbon offsets mechanism, social movements and non-governmental organizations ask the Supervisory Body of Article 6.4 of the Paris Agreement to reconsider its trajectory. The stakes could not be any higher, the science any clearer, or the imperative for immediate action any greater. The Article 6.4 mechanism will be a license to pollute for the industries that have caused climate change and will not avert climate catastrophe already accelerating and deepening global inequalities.

Current levels of warming are already causing permanent loss and damage, especially for the populations most vulnerable to, and least responsible for, the climate crisis. Surpassing 1.5°C of warming—even temporarily—will unleash further irreparable harm taking the planet into a point of no return. The Supervisory Body and Secretariat have a responsibility to listen and incorporate the concerns of cross-constituency groups at the UNFCCC, scientists and social movements who continue to reject carbon trading and offsetting in order to avert climate catastrophe. The urgency of the climate crisis demands a rapid reorientation of our societies and economies away from fossil fuels, the key driver of global warming. There is no time or justification for policy scenarios that fail to center an immediate halt to oil, gas, and coal expansion and the equitably managed phaseout of all fossil fuels. The build out of Article 6.4 offsets mechanisms will do the opposite of phasing out fossil fuels and is indefensible.

Particularly concerning is the continued discussions on the Sustainable Development Tool (SDT) without the expert guidance of the Facilitative Working Group (FWG) of the Local Communities and Indigenous Peoples Platform (LCIPP) who should be the core stakeholders shaping the discussion and decision-making.

Further, and very concerning, is the continued focus on carbon dioxide removals (CDR). Reports on the failure of CDR leaves no doubt: Both biological removals and technology-based removals threaten the rights of Indigenous Peoples, increase emissions and climate change impacts, pose great risks to the ecosystems which sustain life on earth and erode environmental and social justice. Implementing CDR carbon offsets and credits through the Article 6.4 is antithetical to mitigating climate change.

As you consider the parameters of the Sustainable Development Tool (SDT) and discuss carbon dioxide removals (CDR) as a methodology to generate carbon offsets and credits, the undersigned organizations and impacted communities urge you to **recognize that the world no longer has time for misplaced reliance on market-based emissions trading systems and offset mechanisms and call for carbon markets to be abandoned because they** fail to reduce emissions, advance the urgent action needed to end reliance on fossil fuels, halt agro-industrial deforestation and biodiversity loss, are not justice-based climate finance, and do not accelerate a just transition to a fossil-free future. The IPCC has clearly stated the urgency of staying within a rapidly dwindling carbon budget. Doing so requires that efforts to respect and restore natural systems, consistent with Indigenous Peoples' cosmovision, traditional

knowledge, and human and land rights, must be separate from and pursued in addition to emissions reductions policies to phase out fossil fuels, not carbon pricing and trading.

**Further, the following should be taken into account:**

**1) The Supervisory Body must acknowledge and study the failures of previous 'safeguard' approaches and include Indigenous Peoples, women in all their diversity and local communities impacted by carbon markets. Otherwise, the SDT may legitimize ongoing human rights violations and threaten the rights of Indigenous Peoples.** Further, the Rights of Indigenous Peoples of the UNDRIP and free, prior and informed consent must be included in the SDT. The Supervisory Body and Secretariat must ensure that the SDT process includes direction from the Facilitative Working Group (FWG) of the Local Communities and Indigenous Peoples Platform (LCIPP), IIPFCC and other cross-constituency groups in order for the SDT to be treated as a legitimate response to upholding the rights of Indigenous Peoples, women in all their diversity and local communities. Therefore, any discussions should be halted until Indigenous Peoples, women and local community involvement is organized with stronger processes for meaningful participation and more inclusiveness.

**2) The Supervisory Body must acknowledge clearly that reliance on large-sale carbon dioxide removals threatens to result in irreversible harm by pushing the planet beyond 1.5°C warming,** from which a return might not be possible. The Supervisory Body and Secretariat of Article 6.4 must recognize that biological removals, removal technologies, and geoengineering pose precisely the risks to the rights of Indigenous Peoples, social justice, and human rights that climate mitigation should be defending. The Supervisory Body must acknowledge the equal status of other UN fora and their agreements including the Convention on Biological Diversity and the London Convention / London Protocol, and recognize these as the scientific reference in terms of risks and impacts from geoengineering. In doing so it must uphold the *de facto* moratorium on geoengineering under the CBD since 2010, the 2008 prohibition on ocean fertilization and acknowledge more recent moves to restrict potentially 4 additional categories of marine geoengineering under the LC / LP, noting that a commercial factor is a key element in these restrictions on geoengineering and marine CDR. We draw to the attention of the Supervisory Body [a recent statement endorsed by over 100 civil society groups](#) from around the world calling on governments to prevent marine geoengineering experiments and uphold the CBD moratorium.

**3) Article 6 of the Paris Agreement should be sent back to the CMA for a renewed study assessment of evidence that global carbon pricing and offsets can assist the phase out of fossil fuels at source, beginning immediately.** Reports have repeatedly affirmed that fossil fuels are the primary cause of climate change. From double-counting, verifier conflict of interest, coercion, fraud and lack of a sunset plan of Article 6, carbon markets continue to fail and underscores the dire consequences of current levels of warming and the looming threat of triggering tipping points and catastrophic feedback loops if warming surpasses 1.5°C, even temporarily. There is no evidence that the Article 6 carbon pricing and markets will be able to change the fundamental flaws in the market. Therefore, the principal focus of the Supervisory Body on mitigating climate change should be to send a clear message that carbon markets will not end the extraction and use of fossil fuels, nor reduce biodiversity loss, and recognize that wealthy nations should begin to phase-out fossil fuels immediately to avoid temperature overshoot.

**4) In light of the difficult negotiations to end the Clean Development Mechanism of the Kyoto Protocol, the Supervisory Body of Article 6.4 must include a negotiated sunset agreement for Article 6.4.** There are concerns regarding the effectiveness of the carbon markets, and as such, a plan to equitably end Article 6.4 should be implemented before the mechanism is operational. If the Supervisory Body and Secretariat truly believe that the Article 6.4 carbon offsets market will reduce emissions, then a study that calculates when the mechanism will be effective and can be shut down should be issued to avoid uncomfortable situations witnessed in the CDM negotiating space. From the study, a plan outlining the parameters of when and how to terminate Article 6.4 should be included before Article 6.4 becomes operational.

This is the decisive decade for climate action. The public understanding of the decisions made by the Supervisory Body and Secretariat on Article 6.4 will be a critical pillar of that action. You have a responsibility to ensure that negotiations include perspectives which acknowledge the fundamental flaws of carbon markets that Indigenous Knowledge-based and science clearly conveys; the responsibility to convey to the global community the urgency of the crisis and the central role of fossil fuels in driving it; the need for a rapid and equitably phaseout of oil, gas, and coal to avoid overshooting 1.5°C and unleashing further irreversible harm; and thus, the danger of relying on large-scale carbon dioxide removals, carbon trading, markets and offsets, which do not reduce emissions or keep fossil fuels in the ground, and pose significant risks to the rights of Indigenous Peoples, women, local communities, all people and nature.

Sincerely,

350 Bay Area Action US

Acción Ecológica

African Coalition on Green Growth

Africa for Sustainable Development Goals

Akina Mama wa Afrika

Albanian Values (ALVA)

Association Diaoule D'Abord

Association Nationale des Conseils d'Enfants du Bénin (ANACEB)

Association pour la Conservation et la Protection des Écosystèmes des Lacs et l'Agriculture Durable

Aube Nouvelle pour la Femme et le Développement (ANFD non-profit NGO)

Beranda Perempuan Indonesia

Better Path Coalition

Biofuelwatch

Buliisa Initiative for Rural Development Organisation (BIRUDO)

Centre for Alternative Development Zimbabwe

Centre for Climatology and Applied Research

Centre for Environment, Human Rights & Development Forum (CEHRDF)

Center For Sustainable Community Development

Chirapaq, Center of Indigenous Cultures of Peru and Continental Network of Indigenous Women of the Americas (ECMIAN)

CIWED Ghana

Climate Action Network Eastern Africa

Climate Change and Environmental Defenders

Climate Clock DRC

Climate Justice Alliance

CNETZERO DRC

Colectivo VientoSur

Community Action for Health & Development (CAHED)

Community Links and Human Empowerment\*initiative

Congo Basin Conservation Society CBCS network DRC

CSAAZ

DAPP ADSWAC

Eco-Friendly

Emmaus International

Environment Homage Foundation, Kenya

Equal Rights

ETC group

Ethiopian Women with Disabilities National Association (EWDNA)

Expert SDG Algeria

Focus on Women Magazine

Friends of the Earth International

Friends of the Earth U.S.

Gender and Environmental Risk Reduction Initiative (GERI)

Girls United For Human Rights

Global Forest Coalition

Global Sustainable Futures Network CIC

GDMR, Mozambique

Grupo Tematico Migracion del Mecanismo Soc Civil Foro Desarrollo Sostenible

Gulf South Fossil Finance Hub, US

Heinrich Boell Foundation Washington, DC

Human Power Organisation

Ilias Center

Indigenous Environmental Network

Initiatives des Femmes en Situations Difficiles pour le Développement Durable et Intégré (IFESIDDII)

Institute for Agriculture and Trade Policy (IATP)

Institute of Local Governance Studies (INLOGOS)

Institute for Policy Studies Climate Policy Program

Just Transition Alliance

Kutoka Urban Slums Initiative

Lanka Fundamental Rights Organization

Local Governance Network (LOGnet)

MOZalimentus

Mtende Homecraft Foundation, Malawi

NACSO

Narikuravar Education and Welfare Society (NEWS)

Office against Discrimination, Racism and Intolerance (ODRI)

Oil Change International

OSSEDI Malawi

People Federation For National Peace and Development (PEFENAP)

Port Arthur Community Action Network (PACAN)

Priskar Foundation CBO

Quest For Growth and Development Foundation Nigeria

Reform and Hope Organization (REHO)

RECODEF Sénégal AACJ

REPALEF-RDC, République Démocratique du Congo

Réseau Africain Pour l'EDD

Réseau sur le changement climatique en RDC (RCCRDC - PACJA)

Réseau des organisations des jeunes engagés dans le changement climatique, conservation de la biodiversité, zones humides et forêts, DRC

Resilient40 (R40)

Resource Link Foundation

Sahabat Alam Malaysia (Friends of the Earth Malaysia)

San Youth Network

Save Our Illinois Land

Sinatsisa Lubombo Women and Girls Empowerment Organization

Solidarity Health foundation

SOMO The Netherlands

Southern Africa Climate Action Network (SARCAN)

Southern Africa Climate Change Coalition

Southern Africa Climate Smart Agriculture Alliance (SACSAA))

The Center of International Humanitarian Law & Human Rights

TRAFFED - RDC (Asbl)

Unitarian Universalist Church in Anaheim

Village Farmers Initiative (VFI)

VWA FANM AYISYÈN (VFA)

Women's Association Alga

Women's Environment and Development Organization (WEDO)

Youth Action Sustainable Inclusion

Zimbabwe Climate Change Coalition