

Discussion Paper

MATCH-MAKING COMMUNITY-LED CLIMATE ACTION

**Kick-Starting a Course Correct: A Vision
for International Cooperation under the
Paris Agreement beyond Carbon Markets**

Countries participating in negotiations within the UNFCCC need to move beyond their obsession with carbon offset markets and embrace the diverse range of non-market-based approaches.

This Greenpeace Publication is supported by Members of the Climate Land Ambition and Rights Alliance:

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Imprint

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11/2023

S04701

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Key Points

- The establishment of carbon markets under the Paris Agreement has absorbed huge resources and has, other than hot air, delivered very little in terms of meaningful results to address the climate and biodiversity crisis. There is a lack of real solutions that empower communities and unleash international cooperation without the generation of carbon offset claims especially for continuous emissions of high emitting entities. Time for risky offset gambles is over.
- Non-market-based approaches (NMAs) under Article 6.8 have the potential to bring about the much-needed change of course, disrupt business-as-usual and contribute to enhanced ambition if they exclude carbon offsets, as well as measures designed simply to build readiness for carbon markets.
- Article 6.8 can and will only succeed in contributing to the course correct if it is built within a transparent and accessible framework



Greenpeace activists protest at the Laguna de Aculeo for urgent and ambitious action on climate.

of social justice, gender justice, rights-based and ecosystems approaches. Priority areas of focus for NMAs should therefore include land tenure and rights based approaches; external debt cancellation; just transition; ecosystems protection; landscape restoration; zero deforestation supply chains; enhanced traceability, accountability, and participation; and restorative justice initiatives.

- A range of additional and predictable financing options exist to support the implementation of NMAs. These have the capacity to raise trillions of dollars, making clear that there is no lack of finance but a lack of political will. Existing and immediate financial opportunities should be prioritised such as finance becoming available now through the Glasgow Leaders' Declaration.
- Article 6.8 provides major opportunities for enhanced international cooperation and collaboration through joint work programs, including across the three Rio Conventions. The Article 6.8 platform should support the Joint Liaison Group on the Rio Conventions to develop a joint work program.
- Modalities, procedures, and guidelines related to NMAs should be guided by an exclusion list, adopt a precautionary "do no harm" approach, and take measures to prevent and exclude activities that may lead to increases in emissions or other harmful practices on people and biodiversity.
- National Focal Points (NFPs) should prioritise stakeholder participation and put in place processes to support access to the web-based platforms, as well as building capacity and assisting with preparing proposals. Gatekeeping and favouritism by NFPs should be prevented at all costs through enhanced transparency and accessibility.

List of Acronyms

BTR	Biennial Transparency Reports
CBD	Convention on Biological Diversity
CDM	Clean Development Mechanism
COP	Conference of the Parties
CTCN	Climate Technology Center Network
FACT	Forest, Agriculture and Commodities Trade
FAO	Food and Agriculture Organization of the United Nations
GBF	Kunming-Montreal Global Biodiversity Agreement
GCF	Green Climate Fund
GHG	Greenhouse Gases
GLD	Glasgow Leaders' Declaration on Forests and Land Use
GPS	Guidelines, Procedures, and Safeguards
GST	Global Stocktake
ICAO	International Civil Aviation Organization
IEA	International Energy Agency
IGAD	Intergovernmental Authority on Development
IMF	International Monetary Fund
ILO	International Labour Organization
IMO	International Maritime Organization
IP	Indigenous Peoples
IPBES	Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services
IPCC	The Intergovernmental Panel on Climate Change
ITMO	Internationally Transferred Mitigation Outcomes
IUCN	International Union for Conservation of Nature
LCIPP	Local Communities and Indigenous Peoples Platform
LDC	Least Developed Countries
NAP	National Adaptation Plans
NBSAPs	National Biodiversity Strategies & Action Plans
NDCs	Nationally Determined Contributions
NFPs	National Focal Point
NLC	Nigerian Labour Congress
NMA	Non-Market Approach
NYFD	New York Forest Declaration
NWP	Nairobi Work Programme on Impacts, Vulnerability and Adaptation to Climate Change
OECD	Organisation for Economic Co-operation and Development
PA	Paris Agreement
SBs	Subsidiary Bodies
SBI	Subsidiary Body for Implementation
SBSTA	Subsidiary Body for Scientific and Technological Advice
SCF	Standing Committee on Finance
SDGs	Sustainable Development Goals
SDR	Special Drawing Rights
SIDS	Small Island Developing States
UN	United Nations
UNCCD	United Nations Convention to Combat Desertification
UNDP	United Nations Development Programme
UNDRR	United Nations Office for Disaster Risk Reduction
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change

1. Executive Summary

The twin crises of biodiversity loss and climate change are already causing turmoil worldwide. Parties at the United Nations conventions on climate change (UNFCCC) and biodiversity (CBD) should make sure they play a central role in addressing these linked crises but have been slow to do so. The UNFCCC, through its Paris Agreement, has set a global goal that should be met by individual country pledges, called Nationally Determined Contributions (NDCs), but the sum of these pledges falls way short of the action needed to meet the goal of limiting global warming to 1.5 °C. This report looks at a part of the Paris Agreement (Article 6.8) which has the potential, if the political will would be there, to correct the course of climate action through increased international cooperation and to foster closer links with the CBD and other institutions promoting sustainable development.

Article 6.8 of the Paris Agreement aims to foster “integrated, holistic and balanced non-market approaches” for implementing NDCs.¹ It is focussed on increasing both “mitigation and adaptation ambition” but has the further objective of doing so through “coordination across instruments and relevant institutional arrangements” – fostering links with the CBD and other international treaties and initiatives that seek to protect biodiversity, the environment, human rights and sustainable development more broadly.

Until now, work on Article 6.8 has been hampered by the efforts of some countries to limit progress on this item. Instead, especially high emitting parties turned their focus to carbon market measures, which are the focus of other parts of Article 6 of the Paris Agreement. This work on international carbon market rules at the UNFCCC has absorbed huge amounts of time and resources but delivered very little in terms of meaningful results to address the climate and biodiversity crisis.

In this report, we argue that non-market approaches (NMAs) have the potential to bring about the much-needed change of course, disrupt business-as-usual

and contribute to enhanced ambition. As such, it is a mistake to limit Article 6.8 to a carbon market footnote, destined only to provide “readiness” activities for carbon offset schemes that serve mainly to greenwash the continued greenhouse gas emissions of high emitting countries, the fossil fuel industry and other big polluters.

There are numerous areas where NMAs can make a difference. We profile examples that prioritize land tenure and rights-based approaches; external debt cancellation; just transition; ecosystem protection; landscape restoration; sustainable consumption and supply chains; enhanced traceability, accountability, and participation; and restorative justice. For example, conserving primary forests and other carbon-dense primary ecosystems is critical to climate mitigation, as well as serving to protect biodiversity and enhance resilience in the face of climate change. NMAs to support ecosystem protection could support improved governance and management of land and territories, based on a participatory and rights-based approach and financial incentives that facilitate Indigenous Peoples and local communities, landowners and governments in maintaining primary forests and wetlands and improving conservation management.

Article 6.8 can provide a platform for internationally coordinated climate actions which, consistent with the equity principles at the heart of the UNFCCC, would require new, additional, and predictable financing to be provided from developed to developing countries and other entities to enable their implementation. While developed countries claim there is a lack of public finance, and have failed to meet even the US\$100 billion per year climate finance goal set at Copenhagen in 2009, this is not the case. Article 6.8 could help to ensure that there is some accountability when pledges of climate finance are made, such as the Glasgow Leaders’ Declaration (GLD) on Forests and Land Use. In addition, there are numerous possible sources of additional financing, ranging from windfall and wealth taxes, a levy on fossil fuel extraction (Climate Damages Tax), to increased support from philanthropy. These mechanisms have the capacity to



Overflight records areas of illegal mining within the Yanomani Indigenous Land in Roraima, Brazil in April 2021.

raise trillions of dollars and, while Article 6.8 would demand only a small portion of this total, what this makes abundantly clear is that there is no real lack of finance, but only a failure of political will.

Article 6.8 provides major opportunities for joint work across the three Rio Conventions on climate change, biodiversity and desertification. For example, the Article 6.8 platform should support the Joint Liaison Group on the Rio Conventions to develop a work programme and a roadmap to act on the findings of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) and Intergovernmental Panel on Climate Change (IPCC) joint report on Biodiversity and Climate Change.

Article 6.8 can and will only succeed if it is built within a framework of social justice, gender justice, rights-based and ecosystems approaches. As such, the rules on how NMAs operate should be guided by an exclusion list, adopt a precautionary “do no harm” approach, and ensure that they do not promote activities that could lead to increased emissions or cause harm to people and biodiversity.

To ensure accountability, countries through their National Focal Points (NFPs) should prioritise stakeholder participation and put in place processes to support access to the Article 6.8 web-based platform, planned to be launched at CoP28, as well as building capacity and assisting with preparing proposals. This requires a clearly defined role for NFPs to facilitate participation in a transparent manner, avoiding gatekeeping and favouritism that could deny communities or Indigenous Peoples access to the platform.

In short, if Article 6.8 is implemented correctly it could become a broad, open, and inclusive platform for international cooperation, encouraging new collaborations that bring together climate mitigation and adaptation objectives with biodiversity protection, as well as sustainable development support. Expanding the scope of NMAs has the potential to disrupt the disastrous high emissions business-as-usual trajectory the world is currently on, and bring about a much-needed ‘course correct’ in efforts to meet the goals of the UNFCCC and the Paris Agreement.

2. Introduction

Let's face it, humanity is changing the biosphere and decimating biodiversity in unprecedented ways. The extent to which countries are currently off track to achieve the goal of the Paris Agreement (PA), the Kunming-Montreal Global Biodiversity Framework (GBF), and other Sustainable Development Goals (SDGs) is outright dangerous.²

'Unhinged' is how the UN Secretary-General recently described the lack of adequate response to the climate crisis, and it is.³ Despite decades of warnings, the ongoing biodiversity extinction crisis and pronounced climate impacts are causing suffering and turmoil worldwide. There have been years of lost opportunities and the need for an urgent 'course correct' and disruption to business-as-usual has never been so critical. Likewise, front line defenders and Indigenous Peoples are increasingly criminalised and subjected to violence as they undertake efforts to protect their homelands and the world at large. These multiple crises are inextricably linked.⁴ The world has collectively entered a 'Polycrisis'.⁵

The UN body responsible for addressing climate change (UNFCCC) and many experts have recognized a major shortfall in the current pledges by countries known as Nationally Determined Contributions (NDCs). As we now finalize the first Global Stocktake (GST) of the Paris Agreement at COP28 in Dubai, it is clear that more must be done urgently to cut emissions in all sectors and to support synergies for ecosystem-based resilience and adaptation, increasing ecosystem carbon sinks, and biodiversity protection, and to do so in an inclusive, socially just, and rights-based way.

However, the options to support enhanced ambition directly through UNFCCC mechanisms have constraints. The emphasis on bottom-up approaches, a vital feature of the Paris Agreement, requires countries to lead through national actions, which can be limited. Article 6, however burdened with risk it may be, does at least provide for direct support of international cooperation through UNFCCC mechanisms. The intention of Article 6 is to enhance cooperation between countries to



A dried up farm in Leciñena, Zaragoza, Aragón. Greenpeace visits different locations in Spain to document the impacts of drought. Apart from lack of rain, poor management and uncontrolled irrigation system are worsening the situation in the country. Around 75% of its territory is already at risk for desertification.

implement their NDCs and support higher ambition and enhance mitigation and adaptation action across national jurisdictions. It should be given a broad interpretation, and no longer overly focused on market-based approaches.

Article 6 of the Paris Agreement entails negotiations on three approaches to enhance international cooperation. Negotiations on Article 6.2 develop a mechanism for countries to exchange or trade mitigation outcomes known as ITMOs (Internationally Transferred Mitigation Outcomes, aka carbon credits on the voluntary carbon market) to possibly enhance their NDCs. A forest-rich country could exchange ITMOs with a country with no natural sinks but large emitting industries, helping the latter to greenwash its emission portfolio. Negotiations on Article 6.4 aim to establish a new, country driven global carbon market mechanism managed by the UNFCCC, with a range of projections on the value this will add to mitigation and the economy. Negotiations on both of these areas of work continue to stumble upon multiple and significant risks and are mired in disagreement around establishing a sound and reliable approach to carbon market mechanisms. Put bluntly, both of these efforts risk developing cheap greenwashing solutions for those who want to continue wrecking the planet for corporate profit and oppress and exploit the vulnerable through extractivism. Quite some high emitting countries and the fossil fuel industry have advocated predominantly for these market-based approaches for years in order to enable their own business-as-usual.

However, the negotiated cooperative approach under Article 6.8 takes a new and more promising approach that has the potential to disrupt business-as-usual and contribute to a course correct, but only if it is built within a framework of social justice, gender justice, rights-based and ecosystems approaches. It is well advanced now and has the potential to support rapid, enhanced action globally to enable and incentivize the much-needed climate finance. It is, and should remain, a separate and distinct framework within Article 6 that looks beyond the narrow scope of carbon markets, since it is focussed on 'non-market approaches' (NMAs). The intention here is to establish win-win collaborations based on the exclusion of traded or exchanged mitigation outcomes – in short, avoiding compensation-based activities that issue carbon or biodiversity credits.



Top: Heather is set alight on peatlands in the North York Moors National Park for grouse-shooting.

Bottom: Activists demand Metsä Group and the Finnish forest industry to adapt its operations to the limits of nature and climate.

This approach has huge untapped potential to disrupt business-as-usual emissions pathways, to support enhanced resilience of people and ecosystems, and to address the climate and biodiversity crisis equitably and restoratively. Countries negotiating at CoP28 must grab this opportunity now and turn Article 6.8 negotiations into a space of hope for just and honest climate action now.

3. What is Article 6.8 and why is it a space of hope?

Article 6.8 is a unique and important element of the Paris Agreement, with the potential to support a broad range of practical and real solutions, holistic outcomes for communities, climate-resilient development, biodiversity, ecological integrity and climate mitigation and adaptation, and to do so across international instruments. It should be implemented alongside UNFCCC financial mechanisms such as the Adaptation Fund, the Green Climate Fund (GCF) and the Loss and Damage Fund, as well as other international instruments and justice-related initiatives that support communities, Indigenous Peoples and biodiversity.

Article 6.8 emphasizes non-market approaches to assist in implementing NDCs in the context of sustainable development and poverty eradication. It takes a much broader approach than Articles 6.2 and 6.4 to include joint mitigation and adaptation, and other means of implementation (including finance, technology transfer, and capacity building). It is well-positioned to address the polycrisis as it promotes international coordination across instruments and relevant institutional arrangements. Parties to the UNFCCC (countries), multilateral institutions, civil society and Indigenous Peoples networks have all put forward ambitious ideas to build a high-impact NMA ‘pipeline’ of projects.

Current negotiations under Article 6.8 have brought forward the establishment of a web-based platform that should be launched at COP28 and receive content during 2024. This new platform will be an online exchange hub for cooperative NMA projects. A Committee for implementing Article 6.8 will oversee the popularization and utilization of the platform, which should be directly accessible to communities without country gatekeeping and aims to be both decentralised and well-governed. This web-based platform aims to connect project partners and record and exchange information on NMA project implementation.⁶ It will facilitate opportunities for participants to find partners to help identify, develop,

and implement NMA projects. It opens a new space for international cooperation and coordination, and it can help parties with their enhanced transparency requirements, and to gain an overview of the chaotic funding landscape, clarifying how funding arrangements contribute to agreed NDCs and other commitments. With so much emphasis and investment in market-based approaches, many of which are failing, there is a desperate need for this space to play an important role in disrupting business-as-usual. It should prioritize new, innovative approaches through gender-just, rights-based joint mitigation adaptation actions that are not based on generating compensation credits, since those ultimately just allow for continuous emissions or ecosystem destruction.

The NMA platform, however, does not come free of risks. It is potentially a new space for polluting industries and others seeking to implement risky technological ‘fixes’ and false solutions that purport to address climate change. For example, in the climate negotiations, some countries have suggested that Article 6.8 should be the space to create enabling conditions for carbon markets, limiting the space and resources for genuinely non-market initiatives. Under this approach, projects under 6.8 would be readiness initiatives that support the extension of carbon markets. However, this is a misguided intention. Non-market approaches must not be used simply to enable the trade in greenwashing credits. The Guidelines, Procedures, and Safeguards (GPS), which are being developed, should ensure the sound implementation of NMAs only through initiatives aligned with the intention of Article 6.8, namely NMAs to assist in implementing and raising ambition in the NDCs in the context of sustainable development and poverty eradication.

4. Moving beyond an unhealthy obsession with carbon markets

Over the past decade, negotiations related to Article 6 have been dominated by those favouring carbon markets and trading in emissions. This over-emphasis and ‘market bias’ within the climate negotiations has slowed progress on NMAs for years. As far back as 2015, at COP21 in Paris, the UNFCCC Standing Committee on Finance (SCF) provided guidance to the Green Climate Fund (GCF) to make progress on non-market-based (alternative) approaches for joint mitigation-adaptation actions concerning forests, which was not pursued in favour of an emphasis on the REDD+ Results-Based Payments US \$500 m Pilot.⁷ For some years now, the NMA platform has been held hostage within the UNFCCC negotiations while countries spent (and continue to spend) huge amounts of time negotiating the technical complexities of Articles 6.2 and 6.4, insisting all matters under Article 6 should be delivered as one package.⁸ The NMA platform is now in full implementation mode and should, as a matter of good faith, no longer be held back by negotiations concerning markets but should be operationalised independently of the other Article 6 items.

This overdependence on short-term and unsustainable market-based approaches is usually rationalized by a need to mobilize private sector finance. Developed, high-polluting countries are not only seeking to outsource emissions reductions to the global south through carbon market-based approaches, but also aim to outsource their responsibilities to provide the necessary climate finance. Developed countries have yet to achieve the mobilization of the US\$100bn per year climate finance goal promised in Copenhagen fourteen years ago. Yet these same rich, polluting countries have found no shortage of funds to bailout financial institutions, pay billions in fossil fuel subsidies, and

allocate hundreds of billions annually for military spending.⁹ They have also failed to hold the fossil fuel industry (and other major polluters) to account for the destruction and harm they have caused, notably failing to introduce legislation to phase out these polluting industries, or even to levy taxes that apply the internationally recognized principle that ‘polluters must pay.’

The failure to properly support climate mitigation or adaptation is not the result of a lack of available finance, as many carbon market proponents argue, but the result of a lack of political will, the main responsibility for which rests with global elites, and the relationships between polluting industries and politics.¹⁰ Market-based approaches are too often used as a diversion away from the responsibilities of the rich polluting nations to reduce emissions and pay up for historical emissions, or even to support sound, voluntary, cooperative climate action now without compensation claims or the development of new strategic dependencies. Articles 6.2 and 6.4 will, without doubt, be used by the biggest fossil fuel and agro-business polluters as false pathways to an energy transition, offsetting away their commitments and responsibilities. Inaccuracies in accounting and methodologies will allow for continued emissions. Article 6.8 is the appropriate instrument to ‘balance the ledger’ within the Paris Agreement to move us beyond carbon markets and towards community-driven, restorative, bottom up, gender-just, rights-based, ecosystem-centred approaches.

Precious time has been lost, and we now see a succession of carbon market failures associated with forest and land-based carbon trading. Over the past 12 months, we have seen headline after headline and expert report after report, confirming that most forest-based carbon credits circulating in the market are ‘hot air.’¹¹ These so-called ‘certified’ carbon offset credits and compensation schemes are a part of

the entrenched problem of continuous emissions. This issue plagued the failed Clean Development Mechanism (CDM), leading to the creation of the Article 6.4 mechanism. The flaws under these market mechanisms are not new and they continue. They are myriad, ranging from technical permanence and accounting risks to insufficient safeguards to avoid negative impacts on overall mitigation of global emissions, human and Indigenous rights violations, and further destruction of vital ecosystem functions.

Article 6.8 provides a legitimate and transformative way to ‘course correct’ and stop wasting time and money on flawed and risky market mechanisms to greenwash further inaction. It must be embraced to move beyond market-based false solutions and prevent further entrenchment of the polycrisis.



Emma Thompson on board the Greenpeace Rainbow Warrior in Venice supports the European Citizens' Initiative (ECI) to ban fossil fuel advertisements and sponsorships in the European Union holding a banner against greenwashing.

5. If not carbon markets, then what?

Article 6.8 could provide international support for a wide range of practical solutions, supporting the implementation of NDCs and enhancing international cooperation that connects mitigation and adaptation actions with the broader goals of the Paris Agreement, the other Rio conventions, and other multilateral processes. The new goals agreed upon under the Kunming-Montreal Global Biodiversity Agreement and a sound design of a NMA mechanism under Article 6.8 offer a great opportunity to build bridges between the UNFCCC and the CBD through projects emphasizing synergies between climate mitigation, ecosystem-based adaptation, and biodiversity protection. Due to both methodological challenges and the impact on rural livelihoods, Article 6.8 is the only appropriate place for land-based actions. Land-based approaches should continue to be excluded from 6.2 and 6.4 mechanisms.

Alongside positive proposals, the rules established for the NMA platform should ensure that there are clear guidelines, safeguards, and exclusions

so that it does not provide support for approaches that could cause environmental and social harm or further entrench the climate and biodiversity crisis. For countries, the NMA approach can help to deliver greater transparency, an overview of the existing funding landscape, and better accounting for achieved outcomes and improvements. For people and communities, well-implemented NMAs could provide unconditional development support and assistance in better-defining adaptation needs and loss and damage claims.

The following section highlights a range of possible NMAs under Article 6.8, identifying core thematic areas, the scale of the problem that needs addressing, and a range of existing initiatives and proposals that could be built on.

5.1.1 Land tenure and rights-based approaches

Almost a quarter of the carbon stored in the world's tropical and sub-tropical forests is in collectively managed territories, but in many cases Indigenous

Peoples and local communities lack formal recognition of their tenure rights.¹²

There is considerable evidence that securing the land tenure and resource rights of Indigenous Peoples and local communities results in lower rates of deforestation and soil degradation, and better protection of the biodiversity and ecosystem functions upon which these communities depend.¹³ This creates more resilient landscapes, directly contributing to climate change adaptation and mitigation.

NMA approaches could seek guidance from the “Shandia Vision” put forward by the Global Alliance for Territorial Communities, which envisages direct funding to Indigenous Peoples and Local Communities to secure their rights and effectively manage their territories.¹⁴ The International Land and Forest Tenure Facility, which focuses on securing land and forest rights for Indigenous Peoples and local communities, is also now scaling up its support. Projects may take various forms, such as securing land tenure rights, or supporting IP communities to monitor territories to ensure sovereignty, inform law enforcement and protect intact ecosystems from destructive intrusion of illegal loggers, miners or slash and burn farmers.

5.1.2 External debt cancellation

54 countries that are home to more than half of the world’s poorest people currently face a debt crisis, including 28 of the world’s most climate-vulnerable countries.¹⁵ High debt levels reduce the fiscal space for public spending, limiting investment in climate mitigation, adaptation, and loss and damage.¹⁶ Climate vulnerability increases debt distress, since countries facing higher climate risks, especially SIDS and low-income states, pay considerably more to access finance.¹⁷ Loan-based climate finance can also push countries into further debt.

Climate-related debt cancellation measures should be considered as NMAs. Notably, there should be a mechanism to suspend and cancel debt payments when an extreme climate event takes place, so countries have the resources they need for emergency response and reconstruction without going into more debt.¹⁸

5.1.3 Just transition

A Just Transition means promoting alternative development pathways that guarantee social justice while addressing climate change.¹⁹ Relevant policies and measures should support workers’ access to decent work opportunities, including support for re-skilling where possible, and suitable retirement and compensation packages where needed. They should also ensure adequate (grant or zero-interest) financing, strengthened social protection systems, and an inclusive and transparent approach involving communities (especially marginalized groups) and workers (through unions, and representation of informal and precarious workers).

NMAs could use bilateral finance from industrialised countries to support sectoral transition plans in the Global South. While most of the sectoral focus on Just Transition has been on the fossil fuel value chain (from extraction to secondary users in the transport sector and heavy industry), Just Transition initiatives are needed across all productive sectors, including agriculture and food to achieve a 1.5 °C climate goal. For example, the Nigerian Labour Congress (NLC) and civil society partners have started to develop a just transition plan for agriculture based on multisite, bottom-up studies of worker and community views.²⁰ NMAs could support this type of participatory approach, as well as the potential subsequent stages of this work: developing policy measures to promote agroecology at national or regional level; training for workers; and technical support to implement agroecology practices, including the use of monitoring indicators that target improvements in working conditions of agricultural workers (e.g. formalisation of their current jobs).

5.1.4 Ecosystem protection

Protecting all carbon-dense primary ecosystems, in particular all remaining primary forests, is critical to climate mitigation, as they store far more carbon than harvested forests or plantations.²¹ Biodiversity plays an important role in underpinning ecosystem integrity, since protecting and enhancing biodiversity maximises longevity of carbon storage. This has significant co-benefits for adaptation and critical ecosystem services.²²



Thousands of Indigenous women from all over the country are gathering in Brasilia to advocate women's rights and the preservation of indigenous cultures. The march theme "Women Biomes in Defense of Biodiversity Through Ancestral Roots," at the heart of the march is a powerful call for equal rights for indigenous women.

NMAs to support ecosystem protection could support improved governance and management of land and territories, based on a participatory and rights-based approach and financial incentives that facilitate Indigenous Peoples and local communities, landowners and governments in maintaining primary forests and wetlands and improving conservation management.²³ For example, this might include support for a rural community that invests in ecosystem-based adaptation, natural carbon sink improvement and biodiversity protection through ecosystem protection and restoration.

Ecosystem protection initiatives under article 6.8 should be compatible and seek synergies with the Kunming-Montreal Global Biodiversity Framework (GBF), including through participatory spatial planning that respects the rights of Indigenous Peoples and local communities, as well as protecting customary sustainable use of forest resources [and wetlands].²⁴ Further, such work under 6.8 should address the land gap and over-dependence on land in NDCs as identified in the 2022 Land Gap report.²⁵

5.1.5 Landscape restoration

Landscape restoration, which does not involve monoculture plantations, improves ecosystem functions and services that bring broader ecological and social benefits, including the recovery of soil health, improved water quality and availability, and carbon storage capacity, as well as benefiting smallholders and local communities by offering additional and more diversified revenues.

NMAs could support various landscape restoration interventions, ranging from allowing for the regeneration of degraded ecosystems (e.g. woodlands, grasslands or mangroves) through to transitioning towards agroecology or agroforestry. For example, support could be provided to local communities to reclaim farmland from big landowners for the development of more resilient ecological farming cooperatives that developed more ecological diversity in degraded industrial farming landscapes.

Landscape restoration should always be implemented with respect to the land rights and self-determination of Indigenous Peoples and local communities. In particular, it is important to evaluate trade-offs between different land uses to ensure that carbon storage goals do not undermine other land uses.

5.1.6 Sustainable consumption and supply chains

Reducing the consumption of unsustainable commodities is a crucial element of living within planetary boundaries, including climate change. The global food system alone is responsible for a third of global GHG emissions and its sustainable transformation requires a shift in dietary and consumption patterns towards eating more plant-based food, and more sustainably produced food – including reduced reliance on processed foods.²⁶ Transformative measures are also needed across many sectors, including ecodesign regulations for sustainable products; limits on plastics, which have a significant climate footprint as well as causing wider environmental damage; and the elimination of toxic chemicals.

NMAs could support a battery of policy measures aimed at encouraging shifts towards sustainable

consumption, including tax incentives to promote plant-rich diets; support to implement binding targets for reductions in food waste across the supply chain; targets for reduced dairy and livestock consumption; the removal of meat and dairy subsidies (with appropriate compensatory measures to ensure this does not deepen inequality); revised public procurement policies; new rules on marketing and advertising of meat, dairy and eggs; and new dietary guidelines.²⁷

Along a comprehensive UN treaty to end plastic pollution, NMAs reported under article 6.8 could include support for implementing limits on plastic production and use; regulations specifically reducing single-use plastic use; holding corporate polluters accountable; full transparency on plastic production, use, import and export; and ensuring that Indigenous Peoples, Frontline communities, waste pickers and affected workers have a voice in designing a just transition to a reuse economy.

5.1.7 Transparency, accountability, and participation

Corruption poses a significant threat to the effectiveness of mitigation and adaptation measures, as well as potentially contributing to environmental degradation, negative health consequences and human rights violations.²⁸

NMAs could contribute to reducing corruption by improving transparency and reporting standards (particularly around procurement, following standards such as the Open Contracting Partnership); promoting community- and -shared ownership models; enhanced independent monitoring mechanisms and whistleblower protections; and ensuring the participation and prior consultation of Indigenous Peoples, local communities and other civil society representatives.²⁹

Restorative justice

Article 6.8 holds great potential for the establishment of restorative justice initiatives, such as alternative dispute resolution approaches. Restorative justice is “a process whereby all the parties with a stake in a particular offence come together to resolve collectively how to deal with the aftermath of the

offence and its implications for the future.”³⁰ This can prevent the need for resource intensive and stressful climate litigation, offering communities an alternative pathway to progress climate finance or loss and damage claims.³¹ It aims to include and empower those who have faced harms – such as climate-induced loss and damage affecting lives and livelihoods, biodiversity and territories – as well as offering those who have caused these problems a non-judicial path to taking responsibility for the harms they have caused.

NMAs could offer a route for communities, regional or national governments facing irreversible climate impacts to negotiate settlements with fossil fuel companies, under the terms of which the latter may support a variety of needs, ranging from recovery and rehabilitation costs of rebuilding in the aftermath of climate disasters, to support for alternative livelihoods and risk planning tools. Restitution as part of the restorative justice approach could also be non-monetary – for example, through technology transfer or capacity-building.



Photo OP in the sunflower and corn fields in Austria to build awareness regarding the use of crops as biofuels.

6. So, where does the money come from?

NMAs will require new, additional and predictable financing. To ensure that financing for Article 6.8 measures is not simply competing with existing climate finance, this should involve identifying and expanding the range of funding sources beyond nation state contributions and existing mechanisms.

For example, the Glasgow Leaders Declaration (GLD) made at COP26 includes reaffirmations of existing financial commitments and pledges to significantly increase finance and investment to enable sustainable agriculture, sustainable forest management, forest conservation and restoration, and support for Indigenous Peoples and local communities.³² The GLD also pledges to facilitate the alignment of financial flows with international goals to reverse forest loss and degradation, while

ensuring robust policies and systems are in place to accelerate the transition to an economy that is resilient and advances forest, sustainable land use, biodiversity and climate goals. These pledges are now being actualised, making the GLD an obvious and immediate, low hanging fruit source of finance for Article 6.8 initiatives, and can kick start progress.

The table below shows a range of financing options to support NMAs. The revenue estimates are for the whole amount that a particular tax or mechanism could raise and are not intended to pre-judge the share of this funding that would go to supporting NMAs. What this clearly shows, however, is that there is no shortage of financing that could be raised for NMAs but that the core problem is a lack of political will.



Activists outside Major Oil Conference in London. Hundreds of demonstrators gather in front of a Mayfair hotel to protest against the influence of the fossil fuel industry on UK and global climate politics.

SOURCE	BRIEF DESCRIPTION	REVENUE ESTIMATES
IFIs and development finance		
Special Drawing Rights (SDRs)	SDRs are an international reserve asset created by the IMF to supplement member countries' official reserves.	In 2021, US\$ 650 billion in SDRs were issued, a share of which should be re-allocated to countries most in need, including for addressing loss and damage. ³³
Bilateral finance	Bilateral climate finance passes directly from developed to developing countries via development aid agencies and development finance institutions. It can be project based or be paid into specific funding vehicles (e.g. Amazon Fund) to apply across whole sectors.	According to OECD figures, US\$ 31.4 billion in bilateral public finance was provided in 2020. ³⁴ However, activities under Article 6.8 should also receive new and additional funding and support.
National fiscal tools		
Windfall tax	A tax on large corporations' profiteering in the context of high inflation and growing profit margins following the pandemic.	A tax of 50 to 90 percent on the windfall profits of the largest 722 corporations globally could generate between \$523 billion and \$941 billion based on taxing excess profits in the 2021-2022 period. ³⁵
Frequent Flyer Levy	A frequent flyer levy would progressively tax flights, with the price increasing with each flight taken in a year. Varying the levy based on frequency focusses the tax burden on the small proportion of wealthy people who fly a lot. ³⁶ Alternatively, a flat rate air passenger levy has also been proposed by the LDC Group, based on an existing levy that finances UNITAID. ³⁷ Further taxes could be raised from private and chartered jet use. ³⁸	A frequent flyer levy set at \$0 for the first flight, \$9 for the second flight, escalating to US\$ 177 for a person's twentieth flight, would raise an estimated US\$ 121 billion per year. ³⁹
Wealth tax	A tax based on a person's assets (not just income) targeted at those with the highest levels of net wealth.	A tax of up to 5 % on the world's multi-millionaires and billionaires could raise US\$ 1.7 trillion annually. ⁴⁰
Financial Transactions Tax	A tax of 0.05 % on financial transactions (trading in currency, shares, bonds, derivatives and other financial instruments), with a view to both raising revenue and curbing volatility in global financial markets. ⁴¹	Up to US\$ 650 billion per year globally with revenue allocated to climate action and SDG goals. ⁴²
Redirected fossil fuel subsidies	These generally take the form of subsidies to reduce the price of fossil fuels for consumers, or tax breaks and direct payments for producers.	The IEA estimates that there were US\$ 1 trillion in consumer subsidies alone in 2022. ⁴³ However, not all of these represent funds that can be shifted, and a significant share of redirected subsidies would need to be dedicated to compensatory and social protection measures to avoid exacerbating existing inequalities.
International taxes		
Tax on international shipping emissions (bunkers)	Shipping emissions contribute 3 % (and rising) of global emissions but are largely unregulated. A 'bunkers' tax would levy a carbon price per tonne of emissions produced.	US\$ 19 to US\$ 75 billion per year globally. The lower end estimate assumes one-quarter of a US\$ 75tCO ₂ e tax is allocated to international climate financing, while the higher end assumes international climate financing accounts for half of the revenues from a US\$ 150 tCO ₂ e tax.
Levy on fossil fuel extraction (Climate Damages Tax)	A charge on coal, oil and gas extraction based on how much CO ₂ equivalent is embedded in each fossil fuel. 50 percent of revenue in high-income countries would contribute to international climate financing, especially loss and damage, with the rest contributing to a just energy transition. Low-income countries would keep all revenues, with a scale in between.	At US\$ 5/tCO ₂ e it could raise an initial US\$ 69 billion for international climate financing (out of US\$ 210 billion total revenue) rising to over US\$ 380 billion (of US\$ 1.15 trillion total revenue) before falling production takes this total back down to around US\$ 300 billion (of US\$ 915 billion) by 2050. ⁴⁴
Other		
Philanthropy	Grant-making by foundations and (ultra) high net worth individuals to support climate action. However, existing climate philanthropy has been criticised as "elitist, supply-side, market-centred [and] technocratic", and a "radically different" approach should be adopted centred on climate justice principles responding more to grantees' priorities. ⁴⁵	Climate change philanthropy currently accounts for US\$ 7.5 to US\$ 12.5 billion, just 1 to 1.5 % of an estimated US\$ 810 billion in global philanthropic giving. ⁴⁶ Increasing the scale of climate philanthropy, channelling. Re-aligning towards climate justice priorities would increase philanthropy's effectiveness and accountability.

7. Securing a course correct through enhanced international cooperation at COP28

The UNFCCC cannot deliver on the ‘course correct’ alone. A unique feature of Article 6 is that it is intended to support enhanced international cooperation. Through Article 6.8, greater synergies across key international policy processes can support real climate solutions within a justice and rights-based framework through cooperation and joint work. Each year, the UNFCCC Secretariat reports on UNFCCC engagement and collaboration over a 12-month period with other international initiatives.⁴⁷ For 2022, a total of 163 collaborations are reported, which include establishing partnerships, joint work programs, and development of toolkits, assessment tools, and software.⁴⁸

Examples of enhanced international cooperation through ‘joint work’ include: the Joint Work Programme of the Technology Mechanism for 2023–2027 between the UNFCCC, the Climate Technology Center Network (CTCN) and UN Environment; the Kornivia Joint Work on Agriculture between the UNFCCC, where the UN Food and Agriculture Organisation (FAO) is providing technical support; the Joint Programme on Addressing Drivers and Facilitating Safe, Orderly and Regular Migration in the context of Disasters and Climate Change between the UNFCCC, the Intergovernmental Authority on Development (IGAD), the International Organisation for Migration (IOM), the Platform on Disaster Displacement (PDD), The Regional Collaboration Centre Kampala, and the United Nations High Commissioner for Refugees; and the Joint Liaison Group of the Rio Conventions, which brings together the UNFCCC, the Convention on Biological Diversity (CBD), and the UN Convention to Combat Desertification (UNCCD).

The work of the Joint Liaison Group of the Rio Conventions is well aligned with Article 6.8. It seeks to maintain close cooperation between the three secretariats, to promote implementation of multisectoral transformative projects with large scale impacts that integrate action on land degradation, biodiversity loss and climate change, seeking to support delivery of multiple development benefits, such as ecosystem services, climate protection and increased resilience. Delivering on these responsibilities depends upon protecting and restoring biodiversity and ecosystem/ecological integrity. The Executive Secretaries of the three Rio Conventions have also agreed on increasing joint communication efforts to highlight the interlinkages and synergetic benefits of coordinated action to attain the objectives and goals of the respective intergovernmental processes. A joint capacity-building program has also been designed, recognizing the interconnected nature of the three Conventions.⁴⁹

Further, in 2019, the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES), under the CBD, and the Intergovernmental Panel on Climate (IPCC) under the UNFCCC agreed to develop a technical paper on the interlinkage between biodiversity and climate change.⁵⁰ A co-sponsored workshop was subsequently held with the objective of bringing biodiversity to the forefront of land and ocean-based climate mitigation and adaptation discussions through a joint scientific publication.⁵¹ The final joint IPBES / IPCC report delivered 41 conclusions offering guidance on the implementation of the Paris Agreement, the Post-2020 Global Biodiversity Framework, and the Sustainable Development Goals.⁵²



Press conference at Ecological Food Farmers' Trek Launch in Kenya.

The Joint Liaison Group on the Rio Conventions appears to have been somewhat inactive since 2017 and the UNFCCC is yet to consider these conclusions, making it difficult to see how and where they will be operationalised. Hence, calls are being made for a SBSTA Joint Work Programme to guide ecosystem-based synergistic action in National Biodiversity Strategies & Action Plans (NBSAPs) and Nationally Determined Contributions (NDCs).⁵³ Opportunities arise within the context of Article 6.8 to support this work, to hold workshops and support joint work programmes in collaboration with the Joint Liaison Group on the Rio Conventions to work towards the implementation of these conclusions. In addition to workshops under Article 6.8, negotiations should take place under the Subsidiary Bodies (SBSTA & SBI) to achieve COP level, implementation-oriented decisions on the subject. The UNFCCC Standing Committee on Finance should also take the matter up as soon as possible to provide guidance to the UNFCCC financial mechanisms for the scaling up of support and build on previous recommendations related to joint adaptation and mitigation and ecosystem-based synergistic action in NBSAPs and NDCs.

Whilst the collaborations already underway by the UNFCCC appear impressive, there are also many gaps. There are many social, environmental and climate justice networks, Indigenous Peoples networks and other grassroots movements noticeably missing.

It is also not clear how the UNFCCC is supporting country pledges, including initiatives related to the accountability of these pledges, many of which have been made alongside climate conferences or NY Climate Week, such as the New York Forest Declaration (NYFD), the Glasgow Leaders Declaration on Forests and Land Use (GLD) and the Forest, Agriculture and Commodities Trade (FACT) Dialogue.

If the UNFCCC is to play a relevant part in the 'course correct,' things must be done differently, and enhanced international cooperation is a major part of this. There is no room for continued fragmented work in siloes or a business-as-usual approach. Accountability needs to be brought to the fore. The NMA platform through Article 6.8 has the potential to support rapid, enhanced action globally to enable and incentivize new and additional climate finance, to ensure the accountability of pledges (e.g. Glasgow Leaders Declaration on Forests and Land Use), and to support new and emerging initiatives such as the Treaty on the Non Proliferation of Fossil Fuels.⁵⁴ Countries and the UNFCCC Secretariat need to prioritise the allocation of resources to tap into the very significant opportunities that exist through enhanced international non-market based cooperation, including through joint work programmes, stakeholder mobilization, development of toolkits and other publications, capacity building and training, and events.

8. Implementing Non-Market Approaches

The overall NMA framework is well advanced and very nearly ready for implementation. Guidelines, procedures, and safeguards (GPS) are still under discussion, however, and are expected to be further developed. These must be simple, transparent, and inclusive and must not delay the implementation of the NMA platform, the capacity building to manage NMAs at the national level, the mobilisation of implementing and supporting stakeholders, or the development of initial project proposals.

Any GPS must ensure activities supported by the 6.8 platform contribute to decrease in GHG emissions through reduction of emissions or an increase of natural carbon sinks while in the best-case ensuring synergies and benefits for adaptation needs, the protection of biodiversity, and sustainable development benefits for people under a gender and rights-based approach. As a means to support international cooperation, they should support collaboration with other international instruments, like for example the guidelines for ecosystem-based approaches under the CBD.

8.1.1 Guidelines

Guidelines are important tools to ensure ambition is being increased without any risk of supporting activities or actions that may contribute further to the climate and biodiversity crisis. Guidelines should be light-touch, simple, and aligned with existing international best practices, expectations, and commitments, including related to governance. They should ensure a precautionary ‘do no harm’ approach concerning people and biodiversity and should provide clear parameters concerning what is and is not accepted within the platform using simple, easy to use templates and toolkits, which can be developed over time and be improved based on lessons learnt.

In this context, guidelines should make it clear that Article 6.8 activities must not support, directly

or indirectly, activities that involve, or which will lead to

- Extraction, transport, refinement, export, and combustion of oil, coal, gas, or biomass feedstocks;
- Development and deployment of geoengineering technologies; harmful marine and coastal fishing practices;
- Construction of dams that disrupt natural ecosystems or displace large numbers of people;
- Energy generation using nuclear fuels or other activities in the nuclear fuel production cycle;
- Energy generation from incineration of forestry or agricultural biomass;
- Violation of host country legislation or international conventions relating to the protection of biodiversity, human rights, or cultural heritage; or
- Deforestation, loss or damage to primary forests, conversion of natural forests and other natural ecosystems to tree plantations, or degradation of natural forests.

NMA guidelines also need to ensure that the 6.8 platform does not support international cooperative approaches that involve the transfer of mitigation outcomes through offsetting and generating carbon credits for trading, nor should it be used as a readiness opportunity for carbon market mechanisms.

8.1.2 Procedures

Access to the web-based platform should be equitable and simple and prevent unnecessary and inappropriate ‘gatekeeping’ by National Focal Points (NFPs), whilst developing clear criteria for determining and approving NMA projects, including exclusions (as mentioned above) and mobilising bilateral, multilateral, and philanthropic funds. Article 6.8 needs to provide a least cost approach that is simple to use, has no to low transaction costs, and no intermediaries or layers that create barriers to access by communities. The procedures should also be light touch and limited only to accessing the web platform.

On the subject of access and registrations, there should be an expedited registration process commencing in early 2024 to reflect the urgency, for example all organisations registered to the UNFCCC, its financial mechanisms and other relevant UN bodies (e.g. Convention on Biological Diversity, UN Indigenous Peoples Forum) should be automatically able to access the platform.

At the national level, a simple, resource efficient and transparent system for NFP support and review of uploaded proposals should be put in place. National focal points should ensure the space is created at the national level for stakeholder participation and capacity development. Support should be provided to developing countries through UNFCCC financial mechanisms to support NFPs. This should specifically assist communities and organizations in the development of project proposals, as well as ensure ongoing participatory consultation processes related to activities associated with the NFP. No proposal should be objected to by an NFP without good reason (e.g. it is an activity ruled out by the exclusion list) and any rejection by an NFP should be made in writing and uploaded to the platform to enhance transparency.

Further, procedures should be developed for grievance redress and complaints. Such a system needs to be free of charge, accessible and provide assurances of confidentiality and security for complainants.

8.1.3 Safeguards

As safeguards are a matter for consideration across the entirety of Article 6, the issue of safeguards should be deferred to a dedicated discussion concerning Safeguards and Article 6 and should not take resources or time away from the rapid implementation of Article 6.8. In this context, there should be a robust rights-based social and environmental safeguards system in place for all Article 6 activities, which takes into consideration the failings of safeguard systems of the past, particularly as those pertain to the protection of biodiversity, rights, Indigenous Peoples and gender justice. An accessible grievance mechanism governed by an independent body should be established through a participatory process, and



Top: Ecological farmer in Gümüşdere village, Turkey.
Bottom: Produce from an Ecological Farm in Bulgaria.

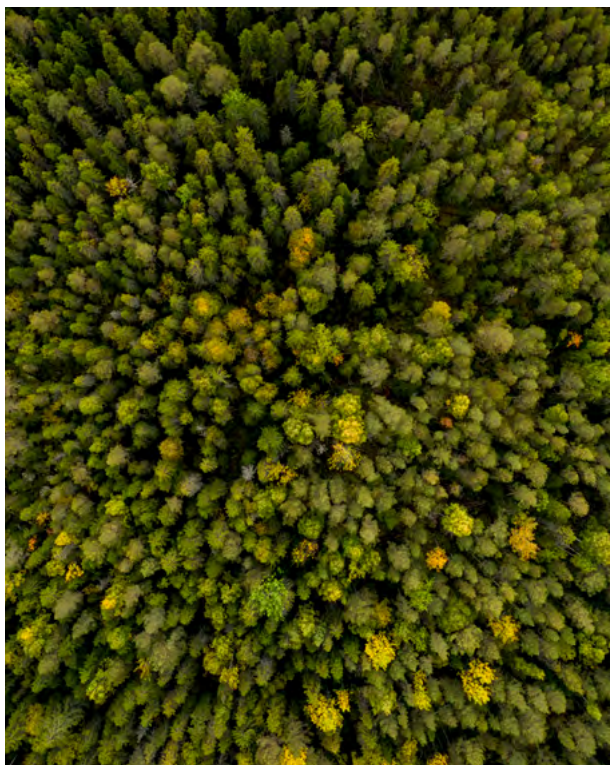
stakeholders should be involved in its design and implementation.

Consultation of local communities and Indigenous Peoples, including respecting Indigenous Peoples' right to free, prior, and informed consent is essential. Without this involvement, projects will not only harm people, but run the risk of facing significant resistance that undermines project sustainability and the ability to deliver on sustainable development. Protecting and including Indigenous Peoples rights is also important, because ecosystems protected through Indigenous Peoples territorial rights are proved to be the most efficient way to conserve these ecosystems.

9. The Web Platform

COP28 is expected to see the launch of the NMA web platform. This is an important development that should not be delayed as a result of negotiations happening in other areas of Article 6 concerning carbon markets, nor should it be linked to carbon market platforms, including those under creation for Article 6.2 and 6.4. Estimates provided by the UNFCCC indicate the platform could be up and running in as little as 6 to 12 months from agreement between countries.⁵⁵

Implementing the NMA platform and establishing the needed capacity to facilitate first projects should be a priority, and 2024 should see the first initiatives uploaded to the platform. Countries with complex and opaque funding landscapes could be frontrunners to cooperate in the utilization of the Platform towards COP30, especially having regard to the high level of interest in projects concerning biodiversity and climate change, an expected priority for COP30. But to make it a success it should



Forest West of Stor-Gravberget in Sweden Edward Beskow

be highly accessible and inclusive, user-friendly, and simple in its design so that there can be direct access by communities, civil society, Indigenous Peoples, and those most in need of support for adaptation and resilience to climate change, without gatekeeping by NFPs.

As NFPs will be put in place, it is important to ensure a system consistent with the principles of accessibility and transparency. Avoiding circumstances that would allow countries to favour access of some stakeholders over others is not in the spirit of Article 6.8, or the Paris Agreement, and should be prevented at all costs. NFPs should follow the guidelines and exclusion list, and where there is an objection to any proposal, upload written reasons to the platform.

Incentives for engagement on the web platform include provision of a central 'hub' and best overview of climate projects being implemented, including information related to stakeholder engagement, finance, monitoring and impact and GHG information. This information can inform country reporting through national communications, biennial transparency reports and greenhouse gas inventories, as well as provide opportunities to draw lessons for building the capacity of national actors. Information contained on the platform could also inform on measures that link adaptation and mitigation, biodiversity and SDGs, as well as implementation of commitments under other international instruments designed to benefit people and nature.

Supporting country efforts concerning enhanced transparency under the Paris Agreement should be a priority for the platform in its design. The first round of Biennial Transparency Reports (BTRs) are expected in December 2024, and there are major capacity-related challenges potentially hindering the ability of many developing countries to submit their BTRs. The web platform should be designed so that the content can easily be downloaded and included in BTRs.



Ernesto Oyama, talking about his plans to merge his plantations with the forest area, establishing a sustainable agroforestry system. South of Sao Paulo, Brazil.

10. Ongoing Roundtable Workshops

Workshops at COP28 and beyond are another feature currently being implemented under the Committee on NMAs, however little clarity is provided on the workshop’s topics. There should be a dedicated discussion within the negotiations to identify workshop thematic topics intended to support the implementation of NMAs as follows:

International cooperation across instruments: Harnessing the potential of enhanced international cooperation is key to the impact potential of Article 6.8. A workshop which provides insights and lessons learnt for countries to support the development of joint work programmes and identify areas for cooperation would be beneficial.

Finance and funding mechanisms: Significant resources can be mobilised through the mobilization of public climate finance and development assistance, philanthropists, or from levies and taxes that seek to reduce fossil fuel use, as well

as speculation in financial markets – delivering a ‘double win’ for land-based action and restorative justice claims in relation to much needed adaptation and loss and damage funding. In addition, examples of funding channels that might be presented at the workshop may include: the Amazon Fund, the Pawanka Fund, the Forest Peoples Climate Platform, the Shandia Mechanism, and The Tenure Facility.

Accountability Frameworks: There is strong alignment between commitments made by countries through recent pledges made at COP26 and COP27 and the activities identified under Article 6.8. The NMA web-based platform could be used as a means to ensure accountability in the implementation of pledges made such as the Glasgow Leaders Declaration to halt deforestation by 2030 and to work together to meet land use, climate, biodiversity and sustainable development goals. Such accountability frameworks are currently lacking and, with no accountability, these pledges are unlikely to be realised.

11. Conclusions and Recommendations for the Course Correct

Article 6 of the Paris Agreement is both a blessing and a curse. Work related to carbon markets has absorbed huge resources and has delivered very little in terms of meaningful results for people or biodiversity, or in terms of reducing greenhouse gas emissions. Work under Article 6 by countries has been overly influenced by the fossil fuel industry and high emitting countries, seeking to continue with business-as-usual through extractivism, capitalism, and exploitation of people and the planet for the increased wealth of a few, despite the very clear impacts occurring around the world, caused by the polycrisis.

NMAs under Article 6.8 do however provide a ‘North Star’ which, if implemented within a framework of social justice, gender justice, rights-based, and ecosystems approaches does have the potential to disrupt the disastrous high emissions business-as-usual trajectory the world is currently on, and bring about the much-needed ‘course correct’ and contribute to enhanced ambition.

Countries participating in negotiations within the UNFCCC need to move beyond their obsession with carbon offset markets and embrace the diverse range of non-market-based approaches, which include: land tenure and rights-based approaches; external debt cancellation; just transition; ecosystems protection; landscape restoration; zero deforestation supply chains; enhancing traceability, accountability, and participation; and restorative justice initiatives. In doing so, it is not a question as to whether the money is there to get this done, but one of political will.

A range of additional and predictable financing options exist which have the capacity to raise trillions in finance, some of which could be used to support the implementation of non-market approaches as well as financing for loss and damage, mitigation and adaptation. Too often, governments call on the

unreliable and self-interested private sector to come to the rescue and finance solutions to the crises. Time is not on our side. Political will, bravery, and proper representation of society by the representatives of governments should outweigh the interests of elites and the corporate capture of politics. The money can be mobilized, but the political will is not. This needs to change.

In addition to the range of NMAs with potential to disrupt business-as-usual, leading United Nations agencies and powerful intergovernmental organizations also need to do things differently. Article 6.8 provides major opportunities for enhanced international cooperation and collaboration through joint work programmes, including across the three Rio Conventions. A strong foundation has been built for enhanced implementation-oriented joint work, including through the joint liaison group on the Rio conventions, and the joint work undertaken by the IPBES and IPCC. There is a need for enhanced joint work with the intention to secure a UNFCCC COP decision for enhanced joint adaptation and mitigation and ecosystem-based synergistic actions.

Implementation of non-market approaches is already taking place around the world, and the UNFCCC needs to play its part in scaling them up by ensuring the framework and platforms being put in place concerning NMAs include guidelines that ensure a precautionary ‘do no harm’ approach and exclude activities which may lead to emissions increases, or other practices that harm people and biodiversity. The web platform, a central feature, should be directly accessible by communities and decentralized, and NFPs should not be enabled to gatekeep. The workshops to take place under the Glasgow committee can make a positive ongoing contribution to implementation, especially related to enhancing inter-national cooperation and holding countries accountable for pledges such as the Glasgow Leaders’ Declaration.

In this context and in times of geopolitical tensions, we make the following recommendations for consideration as we must strive towards sound international cooperation for ambitious climate actions:

- Countries should drive solutions that create synergies between the climate and biodiversity sphere and ensure non-offset action to increase ambition of updated National Biodiversity Strategies and Action Plans (NBSAPs) on the road to the next CBD CoP16 and updated Nationally Determined Contributions (NDCs) by the UNFCCC CoP 30 as response to the Global Stock Take at CoP28 in Dubai.
- Countries should initiate and task the Joint Liaison Group of the Rio Conventions to develop a work programme setting out a roadmap for workshops to take place, including under Article 6.8, and for the implementation of the IPBES/IPCC Report conclusions. This joint work should lead to COP decisions across Conventions, and guidance made to financial mechanisms for the scaled-up implementation of actions that synergistically address the climate and biodiversity crisis across both mitigation and adaptation.
- Countries must prioritize measures to halt deforestation and protection and restoration of ecosystems should be appropriately financed through public funding and other sources and prioritized as a matter of urgency.
- As of COP28, the work on Article 6.8 should become disconnected from the work on Articles 6.2 and 6.4. Article 6.8 and should not become a platform to support enabling conditions for carbon markets.
- Non-market approaches must not be used for the trade of greenwashing credits. Countries negotiating Article 6.8 should ensure the new platform does not become an opportunity for polluting industries and others to support the implementation of false solutions.
- If NMAs are to succeed in contributing to the course correct, the Article 6.8 platform must be built within a framework of social justice, gender justice, rights-based, and ecosystems approaches.
- The NMA platform and NFPs should ensure prioritisation of initiatives related to land tenure and rights-based approaches; external debt cancellation; just transition; ecosystem protection; landscape restoration; sustainable consumption and supply chains; transparency, accountability, and participation; and restorative justice.
- Modalities and procedures related to NMAs should be guided by an exclusion list that must be adhered to by NFPs. The exclusion list should inter alia, prevent projects or programmes that increase GHG emissions, support geoengineering, large-scale dams, the incineration of biomass; violate norms related to the protection of biodiversity, human rights, and culture; or contribute to deforestation or displacement of people.
- Countries must invest in stakeholder engagement and mobilize finance for NMAs, including through new and innovative finance sources. Existing and immediate finance opportunities should be prioritised, such as ensuring that pledges made through the Glasgow Leaders' Declaration are realised.
- NFPs should prioritise stakeholder participation and put in place measures to support access to the web-based platform, including through capacity development for communities seeking access, and project development.
- Gatekeeping and favouritism by NFPs should be prevented at all costs. This can be achieved through the application of an exclusion list and transparent no objection procedures, that require written reasons published on the platform where a proposal is rejected.
- The Glasgow Committee should prioritise a workshop concerning international cooperation across international instruments for the purpose of implementing the conclusions of the joint IPCC/IPBES report, and pathways within the UNFCCC towards joint work programmes, including within the SBs and in collaboration with the SCF. Other workshop topics to be prioritised should include accountability of pledges (e.g. the GLD) and mobilisation of resources.

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The Indigenous Sámi youth organisation Suoma Sámi Nuorat, Suohpanterror activist collective and Greenpeace activists join in a demonstration against industrial exploitation of the Great Northern Forest in the Sámi territory in northern Finland early September 2018.