

Views and information, toward development and implementation of non-market approaches
Article 6.8 Submission on behalf of CLARA, the Climate Land Ambition and Rights Alliance

Summary. The international [CLARA](#) alliance is pleased to submit its views and information regarding the initial focus areas for non-market approaches described at ¶3(a) and (b) of the Glasgow COP26 CMA.3 decision document pertaining to Article 6.8. CLARA proposes one additional focus area to complement those described at ¶(c)(i) and (ii), necessary to achieve the ‘integrated, holistic and balanced’ approach noted in ¶(a) of this same CMA.3 document. We cite existing and potential non-market financing approaches that can become part of the 6.8 framework that builds mutual learning, connects to implementation of the newest LCIP Platform work program, allows for rapid scale-up of activities, and assists countries with fulfilling their NDC pledges. We conclude with comments on the web-based platform and timing of the Work Programme. COP26 decisions make clear that non-market approaches are ready to be implemented. CLARA seeks immediate operationalization of the Article 6.8 mechanism and CLARA members are eager to assist with implementation of activities in these initial focus areas.

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We greatly appreciate the opportunity provided to Accredited Observers to provide views on initial focus areas and relevant non-market approaches under Article 6.8 of the Paris Agreement. CLARA members include many Accredited Observers to the UNFCCC. Forests of the World is submitting these views and information on behalf of the full CLARA Alliance.

PART I – Article 6.8’s unique niche and necessity

CLARA views adoption of guidance on Article 6.8 as the:

Key achievement of COP26. After years of Article 6.8 negotiations being marginalized and joint mitigation-adaption activity proposals being ignored, finally there’s an outcome on Article 6.8 from Glasgow. CLARA members enthusiastically welcome the launch of non-market approaches at COP26. We appreciate the way that CMA.3ⁱ builds on several other recent COP decisions, including Paragraph 15 of the Chile Madrid Time for Actionⁱⁱ, and we welcome Paragraph 38 of the Glasgow Climate Pact.ⁱⁱⁱ Article 6.8 provides opportunities for important points of linkage with action plans developed by the Facilitative Working Group of the Local Communities and Indigenous Peoples (LCIP) Platform. An Article 6.8 platform also provides the natural home for listing activities in the ‘conditional’ portion of Nationally Determined Contributions and matching these with Means of Implementation.

CLARA also notes that this is the sole COP26 output pertaining to Article 6 that specifically stipulates implementation of its work programme “in the context of the Paris Agreement in its entirety, including its preamble.” This language helps to foreground indigenous rights, biodiversity conservation, and the special needs of local communities and other marginalized groups. As such, Article 6.8 represents the most important outcome of COP26 for Indigenous Peoples and Local Communities and marginalized groups such as women, with opportunities for immediate implementation and scale-up of non-market approaches.

Appropriate place for land-sector mitigation activities. Article 6.8 should be the sole mechanism in which to consider removals from AFOLU (agriculture, forestry, and other land use) sectors. The challenge of ensuring permanence of removals greatly complicates the use of AFOLU removals in the transactional environments proposed by Article 6.2 and 6.4. Land- and other ecosystem-based carbon stocks are important in their own right and should *not* be ‘fungible’ with fossil-carbon removals. This is due to measurement (MRV) challenges—estimates of carbon stocks and flows in AFOLU sectors are not even close to the level of accuracy found in non-AFOLU sectors; the continued failure to adequately recognize the importance of ecosystem integrity for ecosystem stability and longevity of carbon storage; the ever-present and still mostly unresolved threat of double-counting of emission reductions and removals; and most importantly, lack of recognition of the numerous critical mitigation co-benefits associated with attempts to pursue low-carbon development pathways in AFOLU sectors.

Since Article 6.8 includes a focus on *resilience* – the only Article 6 mechanism to do so -- CLARA further notes the important potential use of non-market approaches in Article 6.8 for improving accounting of AFOLU sector resources, based on improved understanding of the functional role of biodiversity in supporting robust climate mitigation outcomes in ecosystems. We note that 89 countries assisted in the development of a System of Environmental Economic Accounting (SEEA) that does a much better job of adding nature to the “balance sheet”^{iv} of national accounts, and that the United Nations adopted SEEA as a global framework for national account reporting in March 2021. Activities under the non-market mechanism provide an opportunity for experimentation and improvement of the SEEA framework so as to better capture the combined mitigation and biodiversity conservation benefits associated with high integrity ecosystems and community-managed lands. Further support for this approach can also be found at ¶167 of Decision 2/CP.17, which posits the development of “non-market approaches, such as joint mitigation and adaptation approaches for the integral and sustainable management of forests as a non-market alternative that supports and strengthens governance.” The CMA.3 document’s reference to implementing the Paris Agreement “in its entirety” also creates a link to PA Article 5.2, building further on opportunities to pursue joint mitigation-adaptation activities, results-based payments, and non-carbon benefits. These in turn create links to governance, ecosystem integrity and social benefits – all prerequisites for sustainability of non-market approaches to mitigation.

Improved accounting will also help to operationalize the “protect and conserve” mandate found in Paragraph 38 of the Glasgow Climate Pact, which ties “forests and other terrestrial and marine ecosystems acting as sinks and reservoirs of greenhouse gases” together with “protecting biodiversity”. CLARA takes seriously the opportunity to field-test SEEA approaches through Article 6.8 mechanisms, while also noting that, in contradistinction to the need for intensive rule-writing to make ready the proposed market mechanisms under Articles 6.2 and 6.4, nothing prevents non-market mechanisms under Article 6.8 from being implemented and scaled immediately. All that is lacking is creation of the web-based platform for registering non-market activities, which we address below.

Finally, CLARA points to other recent empirical work on the importance of the mandate found in Paragraph 38 of the Glasgow Climate Pact, including the 2018 CLARA report *Missing Pathways*^v, IPBES/IPCC Workshop recommendations^{vi}, sectoral guidance from the Green Climate Fund on *Ecosystems and Ecosystem Services*^{vii}, and new academic research from leading scientists examining ‘natural climate solutions’.^{viii} CLARA notes the suitability of Article 6.8 non-market approaches for operationalizing the insights on joint mitigation-adaptation, and the particular importance of protecting existing ecosystems, found in these IPBES/IPCC, Green Climate Fund, academic, and civil society network

publications. We would further expect outcomes from the upcoming Conference of Parties of the Convention on Biological Diversity to reinforce this understanding.

PART II. We turn now to the discussion of initial focus areas as outlined in the CMA decision.

Part II -- Initial Focus Areas for the Article 6.8 Non-market Mechanism.

CLARA's attention here is on the focus areas described at (c)(i) and (c)(ii) in the CMA 6.8 decision, which cover both adaptation and mitigation. (CLARA member organizations focus primarily on agriculture and forest livelihoods and sustainability. As such we do not address here issues pertaining to energy use or public transport, for example; we simply limit the scope of this submission to the areas of CLARA member expertise.) CLARA also suggests an additional initial focus area to fulfill the mandate emphasized in Para (a)1 of the decision: that non-market approaches be 'integrated, holistic and balanced'. We argue that the *recognition and protection of rights for local communities and Indigenous Peoples to achieve resilience and foster sustainable development* is a necessary and appropriate complement to the adaptation and mitigation foci found in (c)(i) and (c)(ii).

Article 6.8 is the appropriate place to pursue these four interlocking focus areas – mitigation, adaptation, ecosystem integrity, and rights – in view of the language in Article 6.8 regarding the Paris Agreement preamble; the focus on biodiversity in the COP25 and COP26 outcomes; and finally, to better operationalize and 'mainstream' the work programme of the Local Communities and Indigenous Peoples Platform, as well as the Gender Action Plan adopted at COP25. Non-market approaches that enable countries to pursue 'integrated, holistic, and balanced' outcomes in the conditional portion of their respective NDCs should be paired with appropriate technical and financial cooperation, from both public and private sources. CLARA provides examples of such approaches below, while again noting the importance of building a transparent Registry that links NDC achievement to Means of Implementation.

In this manner, we would also encourage the Standing Committee on Finance to recognize the centrality of non-market approaches at its upcoming (March 2022) meeting, at which the SCF will report on the "determination of the needs of developing country Parties related to implementing the Convention and the Paris Agreement."

Strengthening existing funding mechanisms and action platforms already included in the Convention.

1- LCIP Platform. Creating linkages between the LCIP Platform and Article 6.8 mechanisms would improve opportunities for Indigenous Peoples and local communities to act as agents of climate action, giving concrete expression to Paragraph 7 of the COP26 decision on the LCIP Platform regarding LCIP's traditional knowledge and wisdom about ecosystem management. Leaders within the LCIP Platform draw our attention to the three pillars in its 2022-2024 work plan, namely knowledge, capacity building, as well as policy and action; we emphasize the importance of the use of traditional knowledge, and allowing for effective LCIP governance of lands and territories, as "key to achieving the objectives of the Convention and the Paris Agreement". The Convention has acknowledged, at a rhetorical level, the irreplaceable contributions of LCIPs and traditional knowledge for ecosystem management; it is time to operationalize these insights, and Article 6.8 is an appropriate mechanism for doing so. We also cite the ample empirical research detailing the importance of secure and collective land and forest tenure for mitigation outcomes, and the relatively low cost associated with improving tenurial security.

2- Results based payments – GCF Pilot Programme. CLARA members look forward to engaging with the Green Climate Fund in reviewing results from its REDD+ Pilot Programme on Results-based Payments. The retirement of credits generated in this pilot program provides mitigation benefits that market-based crediting mechanisms cannot. While not all national experiences in the pilot led to the expected high level of mitigation effort and benefit, nonetheless CLARA supports further refinement and expansion of RBP mechanisms in the context of mitigation actions, and views the GCF as the appropriate place to test and further refine national-level non-market approaches, in line with each participating country’s national circumstances.^{ix}

Situating existing funding commitments as part of the Article 6.8 non-market mechanism.

COP26 was the occasion for a number of announcements regarding Party, corporate, and philanthropic support for rights-based mitigation and adaptation efforts. We highlight three such efforts, each of which could be registered at the web-based platform to be developed for listing and characterizing non-market activities under Article 6.8. There are many other such non-market activities found in integrated conservation and development projects, community conservation zones (ICCA) and co-managed protected areas, as well as forest restoration efforts. Thus, the following should be viewed as an indicative but incomplete list.

1- Bullet point #3 in the Glasgow Leaders’ Declaration on Forests and Land Use^x refers to “shared efforts” to “reduce vulnerability, build resilience and enhance rural livelihoods, including through empowering communities...and recognition of the multiple values of forests, while recognising the rights of Indigenous Peoples, as well as local communities.” As such, the Leaders’ Declaration provides an excellent summation of the entwined mitigation, adaptation, ecosystem integrity, and rights-based approaches advanced by CLARA and CLARA members in our policy and project work. Political leaders can give immediate heft and legitimacy to the launch of the Article 6.8 mechanism by fulfilling the ‘shared effort’ pledge and identifying that support as consistent with non-market approaches.

2- Local community and indigenous leaders from the [Global Alliance for Territorial Communities](#) announced in Glasgow on 1 November 2021 the ‘Shandia Vision’ for channeling direct funding to Indigenous Peoples and Local Communities in order to secure their rights and effectively manage their territories.^{xi} [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 to LCIPs. The Community Land Rights and Conservation Finance Initiative (CLARIFI)^{xii}, spearheaded by the [Rights and Resources Initiative](#) and the [Campaign for Nature](#), is a further example of this approach.

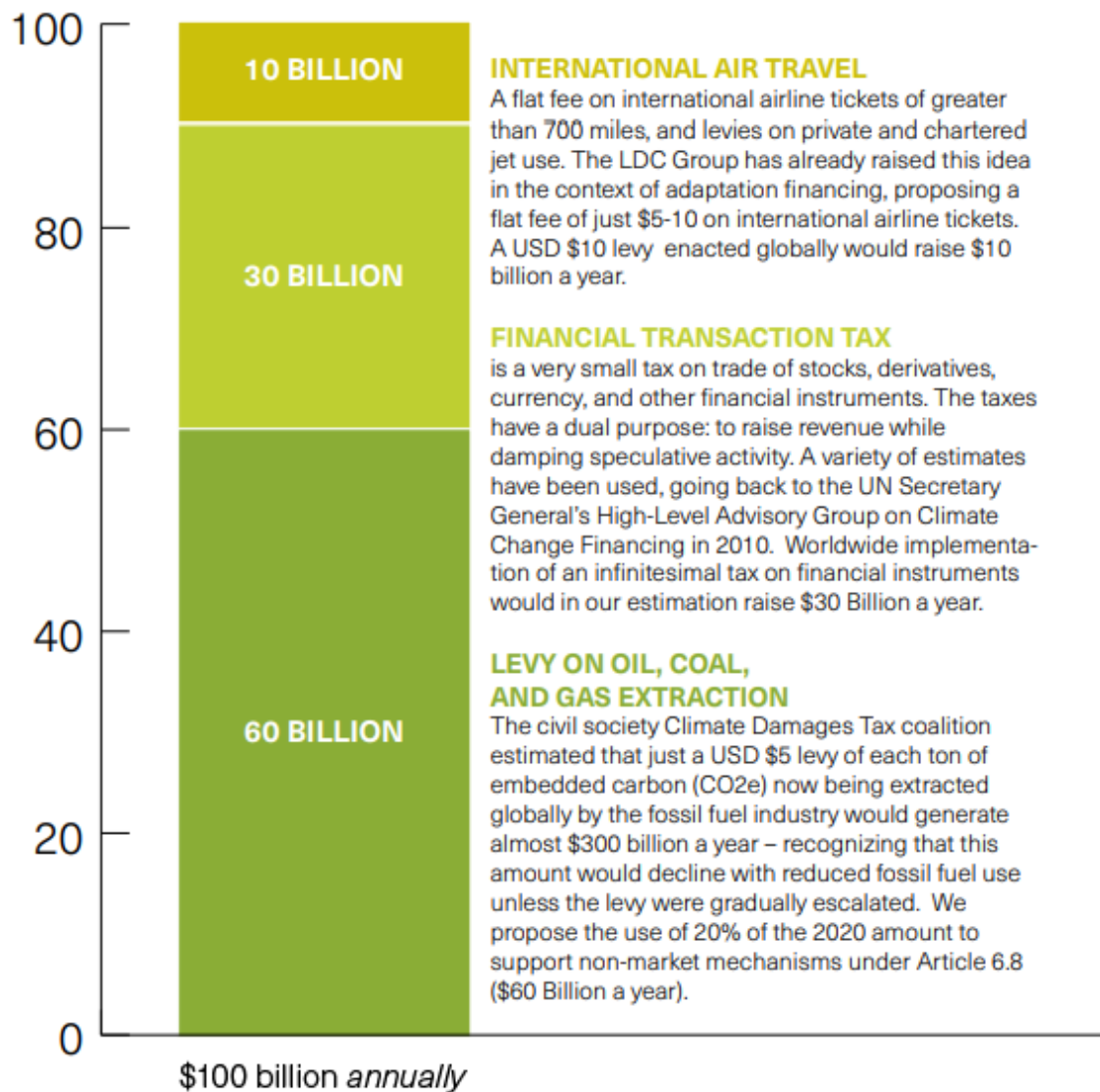
3- Leaders from a number of countries, as well as different European and US philanthropic entities,^{xiii} together announced at COP26 new support for Indigenous Peoples and local communities, pledges totaling USD 1.7 billion. This COP26 announcement cited the “proven role”^{xiv} of Indigenous Peoples and local communities in preventing deforestation. While the text of Article 6.4, for example, only notes the importance of consulting with LCIPs “where appropriate”, initial focus areas under Article 6.8 can do much better in centering support on the knowledge and wisdom of local communities and Indigenous Peoples and providing the resources commensurate with the central role that these communities and their traditional knowledge plays in conservation, management and effective governance of forests and other ecosystems.

Additional funding mechanisms. CMA.3 did not specifically solicit ‘views and information’ on additional and potential funding mechanisms for Article 6.8. CLARA includes this section in order to indicate our support for scale-up of non-market approaches and to suggest three different approaches relevant to that scale-up. CLARA members note in particular the appropriateness of non-market approaches to increasing ambition in ‘conditional NDCs’, since these efforts can both underwrite mitigation benefits and not lead to indebtedness or further financial liabilities for developing countries.

We refer first to CLARA’s previous submission^{xv} on Article 6 mechanisms, in June 2021, that posited new sources of support for non-market activities. These included:

- International Air Travel. A USD 10 levy enacted globally would raise USD 10 billion a year.
- Levy on oil, coal, and gas extraction. We propose the use of 20% of the 2020 amount to support non-market mechanisms under Article 6.8 (approximately USD 60 Billion a year).
- Levies on continued fossil fuel extraction: The Climate Damages Tax coalition estimated that just a USD 5 levy on each ton of embedded carbon (CO₂e) now being extracted globally by the fossil fuel industry would generate almost USD 300 billion a year.
- Levies on air travel: The LDC Group has calculated that an escalating fee on international airline tickets of greater than 700 miles, as well as levies on private and chartered jet use, could raise substantial funds for adaptation financing. A flat fee of just USD 5-10 on international airline tickets – the most carbon-intensive form of passenger travel – would substantially increase resources available for implementation of non-market activities.
- Taxes on speculative behavior in financial markets: A very small Financial Transaction Tax on trade of stocks, derivatives, currency, and other financial instruments could raise revenue for non-market activities while dampening speculative activity. A variety of estimates of revenues have been generated, including by the UN Secretary General’s High-Level Advisory Group on Climate Change Financing in 2010. We estimate the potential to raise USD 30 billion a year through very modest taxes.

The potential for scale-up from these resources is shown in the figure below. We note that this figure dwarfs the current size of the Voluntary Carbon market, and mobilizes finance for real mitigation action at a greater level than even the most optimistic projections of carbon-market growth, and thus is poised for much greater impact than can be achieved through Article 6.2 and 6.4 mechanisms



CLARA also recognizes the continued relevance of the concept of *climate debt* cited by the Plurinational State of Bolivia in its September 2013 submission^{xvi} regarding non-market mechanisms under the Convention, and by a range of Parties whose interventions during the past two years have noted the serious fiscal situation and vulnerabilities of developing countries as a result of the need to respond to the global pandemic. In our view, the transactional environments proposed in the market mechanisms under Article 6.2 and 6.4 remove the question of historical responsibility for emissions from current mitigation mechanisms. CLARA believes this erasure is not consistent with, nor promotive of, the provisions pertaining to equity in both the Convention and the Paris Agreement. Support of activities under 6.8 provides a just and practical mechanism for addressing the ongoing challenge of climate debt,

including the possibility of debt forgiveness and debt swaps to provide countries with the fiscal space necessary to pursue the land-sector activities already outlined in Nationally Determined Contributions.

Finally, we note that a subset of the corporations making ‘net zero’ commitments do acknowledge the question of historical responsibility for emissions, and therefore strive to go ‘above and beyond’ offsetting to take responsibility for such emissions. The Science-based Targets Initiative (SBTi), for example, uses the term “compensation” to refer to the common practice of using offsets to achieve a specific ‘net zero’ target; this is the logic undergirding actions under Article 6.2 and 6.4. The SBTi, however, also notes the potential for companies to make a ‘contribution’ to mitigation measure, that isn’t defined transactionally vis-à-vis ongoing emissions by that same entity.^{xvii} Financing ‘additional emission reductions’, as defined by SBTi, corresponds to the second (b) focus area listed in the CMA decision, “Mitigation measures to address climate change and contribute to sustainable development”.

PART III – Platform and Work Programme

The Web-based platform. The UNFCCC web-based platform, referred to in paragraph 8 (b)(i) of the CMA.3 decision Annex, would support the “identification of opportunities for participating Parties to identify, develop and implement NMAs.” The web-based platform for non-market mechanisms should, of course, be developed in ways that are consistent with the enhanced transparency framework. CLARA suggests that the Glasgow Committee be guided by Section V of activities of the Work Programme of Decision CMA/3: first identifying focus areas of work, then identifying appropriate areas of financial and technical cooperation, and finally listing Means of Implementation in the Registry to be established.

CLARA sees no technical or conceptual barriers to the immediate establishment of a web-based platform for non-market activities. CLARA has here identified five different non-market activities that can be included in the Article 6.8 mechanism, as well as a number of ideas related to funding that would enable Parties to better develop, implement, scale up, and match those activities in particular to areas of ambition found in conditional NDCs.

A simple web-based platform that a) identifies activities and b) provides ‘matchmaking’ between the ideas listed and the funding sources interested in promoting land tenure, agroforestry, and other integrated conservation and development approaches is, in our view, a relatively simple step to take, and one that will provide greater visibility to those entities, be they Parties or companies, that have proven willing to go beyond the ‘compensation’ logic of offsetting and toward making a contribution to the Convention’s long-term temperature goal through support of non-market activities related to mitigation. The platform should be open to use by Parties as well as accredited private sector and philanthropic entities. The platform can be used to map and register transboundary cooperative initiatives.

Reporting requirements are simple because under a non-market mechanism, there is no crediting or offsetting requirement – no need to parse the action with respect to relative contributions from private and Party actors. One hundred percent of the mitigation efforts under Article 6.8 can be counted toward achieving the goal of the Convention found in Article II of the Paris Agreement, and will be reflected in developing-country NDCs.

We therefore support the idea of the website functioning as a Repository of actions that communicate the needs of countries, based on their conditional NDCs, *linked to* the Provision of Means of Implementation, including financial, technical, and other forms of cooperation.

Schedule for implementation of the work programme. We see two simple tasks:

- *Determine focal areas.* CLARA has suggested a holistic and integrated approach focusing on adaptation, mitigation, and rights. We have provided a list of five possible examples through which such approaches can be pursued, as well as a number of ideas for financing the scale-up of non-market approaches.
- *Enable countries, companies, and philanthropic entities to list their projects and engagement in the web-based platform* and to build out the Repository as the essential tool for linking such projects to activities found in the ‘conditional’ NDCs of developing countries. We call again on the Standing Committee on Finance to provide a substantial focus on non-market mechanisms under Article 6.8 as part of its support for determining the needs of developing country Parties.

Two areas requiring more elucidation are: a) aligning the Article 6.8 platform with the implementation of activities found in the LCIP Platform’s current workplan; and b) determining whether the Article 6.8 platform supersedes, or exists in parallel to, NAMAs, or at least to that subset of NAMAs that don’t involve the use of offsets or compensation. With respect to cross-referencing the LCIP Platform, this is more opportunity than barrier, since the LCIP Platform is just embarking on its next two-year workplan, and the activities discussed here would provide greater visibility to Platform efforts while simultaneously linking to scaled-up activities in support of community ownership and leadership that may not yet be appreciated as non-market approaches.

NAMAs could be cross-listed with Article 6.8 activities. We are particularly interested in seeing the Article 6.8 web-based platform begin also to note activities undertaken under the Convention on Biological Diversity. Such activities on joint mitigation-adaptation, ecosystems approach and ecosystem resilience, would serve as a practical means toward tracking implementation of the desired ‘integrated approaches’ noted in ¶15 of the Chile Madrid Time for Action.

All of this can and should be accomplished in the 2022 calendar year. 2022 is the final year before the first Global Stocktake (GST) under the Paris Agreement. A functioning web-based platform for implementation of Article 6.8, linked to the Enhanced Transparency Framework, visible in the context of the GST, and supportive of the fulfillment of conditional NDCs of developing countries, should be a core implementation goal for the UNFCCC Secretariat in 2022.

We count *more than twenty* different areas of further clarification and rule-writing in the CMA text on Article 6.4^{xviii} and we again note our concern that Article 6.8, in that respect could be ‘held hostage’^{xix} to the other Article 6 mechanisms. There is no reason to wait, and certainly no reason to hold up implementation of non-market mechanisms until other Article 6 mechanisms are ready. Article 6.8 is both ‘shovel ready’ and ‘fit for purpose’ for building an implementation agenda related to non-market activities.

Conclusion.

CLARA again thanks the SBSTA chair for the opportunity to provide this Submission regarding implementation of Article 6.8 of the Paris Agreement. CLARA members enthusiastically support immediate design and construction of the web-based portal, and the listing of relevant non-market approaches for implementation and scale-up. We expect to see this progress reflected in outputs from the Standing Committee on Finance as well.

In the introduction to this Submission, we noted that the completion of Article 6.8 was the most important outcome of COP26 for Indigenous Peoples, local communities, and marginalized groups. We note here again that the CMA.3 text makes special mention of the importance of the Paris Agreement Preamble to the scope of the Article 6.8 work program.

We conclude by honoring the speakers in Glasgow at the 3 November 2021 event, “Reviewing Achievements of the Facilitative Working Group of the Local Communities and Indigenous Peoples Platform.”^{ix} Indigenous leaders at this COP26 event noted the importance of rights in the Paris Agreement Preamble, but then went on to lament that rights-based considerations have not substantially informed the actions, programs, and planning taken under the Paris Agreement.

Article 6.8 provides that integrated space for people, nature, and climate sought by speakers urging the mainstreaming of LCIP Platform actions. It can help to better incorporate the knowledge of Indigenous Peoples to inform adaptation and mitigation actions; and it can become a locus of joint action on climate change and biodiversity conservation. Finally, CLARA argues that non-market-based approaches, highlighted in a Registry designed as a 'matching facility', enables Parties to better communicate their financial and technical needs related to the conditional portion of NDCs.

CLARA urges attention to gender-just, rights-based, joint mitigation-adaptation activities as *the* key initial focus area for actions under Article 6.8 of the Paris Agreement.

ⁱ We refer to the ‘Advance Versions’ currently on-line at UNFCCC.int, and use paragraph numbering from those documents.

ⁱⁱ Found at https://unfccc.int/sites/default/files/resource/cp2019_13a01E.pdf.

ⁱⁱⁱ Found at https://unfccc.int/sites/default/files/resource/cma3_auv_2_cover%20decision.pdf.

^{iv} See <https://www.tbsnews.net/bloomberg-special/earths-value-being-left-balance-sheet-325393> from 4 Nov 2021 for commentary on this topic.

^v Available at <https://www.clara.earth/missing-pathways>.

^{vi} Found at <https://www.ipbes.net/sites/default/files/2021-06/20210606%20Media%20Release%20EMBARGO%203pm%20CEST%2010%20June.pdf>.

^{vii} See <https://www.greenclimate.fund/event/introductory-webinar-draft-gcf-sectoral-guide-ecosystem-ecosystem-services>.

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- viii See the article “Protect, manage and then restore lands for climate mitigation”, published November 2021 in **Nature**, found at <https://www.nature.com/articles/s41558-021-01198-0>.
- ix CLARA further notes the mandate from the Standing Committee on Finance to the Green Climate Fund on JMA (Non Market based approaches), found at <https://unfccc.int/resource/docs/2015/cop21/eng/10a02.pdf#page=8>. The SCF avoided a specific linkage to REDD+, instead calling for a ‘Joint Mitigation and Adaptation Mechanism for the Integral and Sustainable Management of Forests’. Whatever term is used, CLARA supports the idea of Joint Mitigation Adaptation for Rights and Ecosystems, in the context of Article 6.8, and in line with GCF sectoral guidance on ecosystems.
- x See <https://ukcop26.org/glasgow-leaders-declaration-on-forests-and-land-use/>.
- xi See for example <https://www.alianzamesoamericana.org/en/indigenous-peoples-and-local-communities-own-958-million-hectares-of-the-worlds-tropical-forests/>.
- xii See <https://www.reuters.com/markets/commodities/climate-fund-aims-help-indigenous-people-protect-worlds-forests-2022-01-11/> for a news article about the launch of CLARIFI.
- xiii The 17 philanthropic entities are: [Ford Foundation](#), [Children's Investment Fund Foundation](#), the [Christensen Fund](#), [David and Lucile Packard Foundation](#), [Sobrato Philanthropies](#), [Good Energies Foundation](#), [Oak Foundation](#), [William and Flora Hewlett Foundation](#), and, as part of the Protecting our Planet Challenge members, [Arcadia](#), [Bezos Earth Fund](#), [Bloomberg Philanthropies](#), [Gordon and Betty Moore Foundation](#), [Nia Tero](#), Rainforest Trust, [Re:wild](#), [Rob and Melani Walton Foundation](#) and the [Wyss Foundation](#).
- xiv See for example “The role of Indigenous peoples and local communities in effective and equitable conservation”, published in **Ecology and Society**, found at <https://www.ecologyandsociety.org/vol26/iss3/art19/>.
- xv See <https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202105281242---CLARA%2031%20May%20submission%20on%20Article%206%20ambition.pdf>.
- xvi See https://unfccc.int/files/cooperation_support/market_and_non-market_mechanisms/application/pdf/nma_bolivia_03092013.pdf.
- xvii See <https://sciencebasedtargets.org/resources/files/foundations-for-net-zero-full-paper.pdf> for discussion regarding the distinction between ‘compensation’ and ‘contribution’.
- xviii https://unfccc.int/sites/default/files/resource/cma3_auv_12b_PA_6.4.pdf.
- xix For more on this concern, see CLARA’s 2021 Submission on Article 6.8, found at <https://www4.unfccc.int/sites/SubmissionsStaging/Documents/202105281242---CLARA%2031%20May%20submission%20on%20Article%206%20ambition.pdf>.
- xx See <https://www.youtube.com/watch?v=mypbTH-KqcM>.