

A6.4-SBM018-AA-A05

Information note

Revision of activity standards and validation
and verification standards for projects and
programmes of activities

Version 01.0



United Nations
Framework Convention on
Climate Change

1. Procedural background

1. In response to the mandates from Decision 3/CMA.3, the Supervisory Body of the mechanism established by Article 6, paragraph 4, of the Paris Agreement adopted, at its fourteenth meeting, the “Standard: Application of the requirements of Chapter V.B (Methodologies) for the development and assessment of Article 6.4 mechanism methodologies”¹ (hereinafter referred to as the methodologies standard) and the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism”² (hereinafter referred to as the removals standard). The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (hereinafter referred to as the CMA) took note, at its sixth session of the adoption of these standards by the SBM.
2. The Supervisory Body, at its eight meeting, adopted the “Standard: Article 6.4 activity standard for projects” (hereinafter referred to as the AS-P) and the “Standard: Article 6.4 validation and verification standard for projects” (hereinafter referred to as the VVS-P) which sets out, the requirements relating to the design, implementation and other attributes of A6.4 projects and the requirements relating to validation and verification for Article 6.4 mechanism projects.
3. The Supervisory Body also adopted, at its sixteenth meeting, the “Standard: Setting the baseline in mechanism methodologies”³ (hereinafter referred to as the baseline standard) and the “Standard: Addressing leakage in mechanism methodologies”⁴ (hereinafter referred to as the leakage standard). These standards set out, the requirements for mechanism methodologies for setting the crediting baseline, including identifying the baseline scenario, determining baseline emissions and/or removals, and determining standardized baselines, and for mechanism methodologies to first identify potential sources of leakage, then seek to avoid or, where this is not possible, minimize any negative leakage, and subsequently calculate and subtract any remaining negative leakage of an Article 6.4 activity.
4. The Supervisory Body further adopted, at its seventeenth meeting, the “Standard: Addressing suppressed demand in mechanism methodologies”⁵ (hereinafter referred to as the suppressed demand standard) that sets out the requirements for recognizing suppressed demand in mechanism methodologies by providing requirements on how to identify the service level that fulfils basic human needs and identify the baseline technology and/or practice where suppressed demand exists, and the means to monitor whether suppressed demand conditions persist during the crediting period.
5. The Supervisory Body, at its seventeenth meeting, requested the secretariat to revise the “Standard: Article 6.4 activity standard for projects”, “Standard: Article 6.4 validation and verification standard for projects”, “Standard: Article 6.4 activity standard for programmes

¹ See <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-001.pdf>.

² See <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-002.pdf>.

³ See <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-004.pdf>.

⁴ See <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-005.pdf>.

⁵ See <https://unfccc.int/sites/default/files/resource/A6.4-STAN-METH-006.pdf>.

of activities” and “Standard: Article 6.4 validation and verification standard for programmes of activities”, for consideration at a future meeting, by providing criteria for request for deviation, which should, as a minimum, establish acceptable limits with respect to the significance and severity of the impacts and potential implications of the unavoidable negative impacts.

2. Purpose

6. The purpose of these revisions are to reflect the applicable requirements from the baseline standard, leakage standard and suppressed demand standard, that are to be addressed by activity participants when designing and monitoring Article 6.4 activities and when updating the design of the activities at the renewal of crediting period and validated or verified by designated operational entities (DOEs) in the AS-P and in the VVS-P as contained in appendix 1 and appendix 2.
7. These revisions also aim to introduce new requirements and criteria for a deviation of the elements and criteria of the Article 6.4 Sustainable Development Tool (hereinafter referred to as the A6.4 SD Tool) in the AS-P, the VVS-P, the “Standard: Activity Standard for Programmes of Activities” (hereinafter referred to as the AS-PoA) and the “Standard: Validation and Verification Standard for Programmes of Activities” (hereinafter referred to as the VVS-PoA) as contained in appendix 1, appendix 2, appendix 3 and appendix 4.
8. The revisions of both, the AS-PoA and the VVS-PoA, also include the outcome of the structured editorial and legal review carried out by the secretariat in response to the mandate from paragraph 35 of the tenth meeting of the Supervisor Body.
9. For ease of identification of the background of the revisions, the changes made to reflect the inclusion of the provisions for deviation from elements and criteria of the SD Tool are highlighted in yellow, whereas the changes made to reflect the structured legal and editorial review are highlighted in green.

3. Key issues and proposed solutions

3.1. Design of the project and preparation of the project design document

10. The newly adopted standards elaborate on specific requirements for setting the baseline of Article 6.4 projects, for setting the activity boundary, for identifying and addressing leakage, for avoiding double counting, and for addressing suppressed demand.
11. Taking into account that methodological standards are only applicable at the project level, the table below demonstrates how paragraphs and relevant provisions of each of the baseline, leakage and suppressed demand standards have been reflected in the AS-P and in the VVS-P.

Table 1. Changes made to the AS-P and to the VVS-P to reflect the requirements of the baseline standard, leakage standard and suppressed demand standard to the design of projects

Requirement from the newly adopted standard	Amendments to the AS-P	Amendments to the VVS-P
<p>Paragraph 10 of the baseline standard requires methodologies to require activity participants to describe the pre-activity scenario in the project design document (PDD), which can be:</p> <ul style="list-style-type: none"> (i) the scenario that corresponds to the circumstances immediately prior to the implementation of the A6.4 project and shall be the existing conditions at the site where the activity will be implemented; or (ii) the conditions in the absence of policies that refer to or formally integrate the mechanism as an instrument for implementation; or (iii) the existing conditions for providing the activity output(s) in the baseline geographical reference area for the case of distributed technologies for households, communities, and/or small and medium enterprises. 	<p>This requirement was added in paragraph 15(g), under section '6.1. Description of the project'.</p>	<p>Validation by the DOE of this requirement was added under section '6.2.3. Description of project'.</p>
<p>Paragraph 17 of the appendix to the baseline standard requires methodology proponents to identify risks of potential double counting of the emission reductions or net removals and, where such risks are relevant and material, include provisions to avoid such double counting in the mechanism methodology.</p> <p>Paragraphs 18 to 22 of the appendix to the baseline standard provides three potential types of double counting (i.e. double counting due to overlapping claims between different carbon crediting mechanism activities, double counting due to overlap with mandatory domestic mitigation</p>	<p>Double counting due to overlapping claims between different activities is a requirement that shall be addressed among the activity participants (e.g. through an agreement signed by activity participants), whereas double counting due to overlapping with mandatory domestic mitigation schemes or with other frameworks or environmental markets shall involve entities at a higher level (e.g. operator of the emission trading scheme (ETS) or entity supervising the environmental market).</p> <p>A new section '6.6.2. Addressing double counting due to overlapping claims between different Article</p>	<p>Validation by the DOE of these requirements was added under a new section '6.2.8.2. Addressing double counting due to overlapping claims between different Article 6.4 mechanism activities, due to overlap with mandatory domestic mitigation schemes and due to overlap with other frameworks or environmental markets'.</p> <p>New sections '8.2.3. Avoidance of double counting due to overlap with mandatory domestic mitigation scheme' and '8.2.4. Avoidance of double counting due to overlap with frameworks or environmental markets' were introduced as new requirements to address the specific issues due to potential double</p>

Requirement from the newly adopted standard	Amendments to the AS-P	Amendments to the VVS-P
<p>schemes, and double counting due to overlap with other frameworks or environmental markets) and proposals on how to address them</p>	<p>6.4 mechanism activities, due to overlap with mandatory domestic mitigation schemes and due to overlap with other frameworks or environmental markets' was added requiring activity participants to describe how double counting due to overlapping claims between different activities, due to overlap with mandatory domestic mitigation schemes and due to overlap with other frameworks or environmental markets, is addressed in accordance with the applied methodologies.</p> <p>New sections '8.4. Avoidance of double counting due to overlap with mandatory domestic mitigation scheme' and '8.5. Avoidance of double counting due to overlap with frameworks or environmental markets' were introduced as new requirements to address the specific issues due to potential double counting due to mandatory domestic mitigation schemes or other frameworks or environmental markets.</p>	<p>counting due to mandatory domestic mitigation schemes or other frameworks or environmental markets.</p>
<p>Paragraph 5 of the appendix to the baseline standard requires methodology proponents to indicate whether each greenhouse gas (GHG) emission source, sink or reservoir is controlled, related to, or otherwise affected by the applicable A6.4 project.</p>	<p>Paragraph 35, under section '6.4.3. Project boundary, sources, sinks, greenhouse gases and reservoirs' was revised to request activity participants, in line with the methodology, to indicate whether the GHG emission source, sink or reservoir is controlled, related to, or otherwise affected by the project.</p>	<p>Validation by the DOE of this requirement was added under section '6.2.8.3. Project boundary, sources, sinks, greenhouse gases and reservoirs'.</p>
<p>Paragraph 9 of the appendix to the baseline standard requires methodologies to require activity participants to delineate the geographical boundary of a proposed Article 6.4 activity and may require activity participants to specify the activity's location in the form of Keyhole Markup Language files or similar formats as one or more polygon(s), by specifying the coordinates of the</p>	<p>Paragraph 35, under section '6.4.3. Project boundary, sources, sinks, greenhouse gases and reservoirs' was revised by replacing the use of GPS coordinates with the use of Keyhole Markup Language files or similar formats as one or more polygon(s), by specifying the coordinates of the geographic boundary using a known coordinate</p>	<p>Validation by the DOE of this requirement was added under section '6.2.8.3. Project boundary, sources, sinks, greenhouse gases and reservoirs'.</p>

Requirement from the newly adopted standard	Amendments to the AS-P	Amendments to the VVS-P
geographic boundary using a known coordinate system or any other method to delineate the geographic boundary.	system or any other method to delineate the geographic boundary.	
Paragraph 16 of the suppressed demand standard requires methodologies to require activity participants to demonstrate that the intended project beneficiaries are in suppressed demand conditions with respect to the identified basic human need(s) at the start of each crediting period and that these conditions are likely to persist throughout the crediting period.	Paragraph 39 under section ‘6.6.4. Baseline scenario’ was redrafted by requiring activity participants to follow, at the start of each crediting period, the requirements from the applied methodologies to address suppressed demand if the beneficiaries of the A6.4 project are in suppressed demand conditions.	Validation by the DOE of this requirement was added as per paragraph 49bis. under section ‘6.2.8.4. Baseline scenario’.
Step 4 of the process under the baseline standard to determine the crediting baseline requires mechanism methodologies to identify a conservative business-as-usual (BAU) baseline (paragraph 31).	Paragraph 43 under section ‘6.6.5. Business-as-usual scenario’ was redrafted requesting activity participants to identify and describe the conservative business-as-usual (BAU) scenario in accordance with the applied methodologies.	Validation by the DOE of this requirements is to be undertaken as per the amended paragraph 51 of section ‘6.2.8.5. Business-as-usual scenario’.
<p>The baseline standard contains a stepwise approach for mechanism methodologies to identify the crediting baseline. The baseline standard allows some requirements to be set by the methodology or to be set by activity participants through a procedure contained in the methodology (e.g. for defining the baseline geographical reference area, for defining the downward adjusted baseline based on the approach defined by the methodology).</p> <p>In addition, the baseline standard requires methodologies to require activity participants to compare the downward adjusted baseline emissions with the conservative BAU emissions and to undertake further adjustment (by revising the quantitative methods and factors) if the conservative BAU emissions are lower.</p>	<p>Paragraphs 55 and 56 under section ‘6.6.8. Estimation of emission reductions or net removals’ were redrafted, accordingly, to:</p> <ul style="list-style-type: none"> - Require activity participants, to describe in the PDD how they determine the ex-post crediting baseline for the proposed A6.4 project in accordance with the applied methodologies, the applied standardized baselines and other applied methodological regulatory requirements and describe and justify in the PDD how the calculation complies with all requirements in the applied methodologies, the applied standardized baselines and other applied methodological; regulatory documents; - Require activity participants to provide the ex-ante calculation of the crediting 	Validation by the DOE of this requirement was added under section ‘6.2.8.8. Estimation of emission reductions or net removals’, paragraphs 62bis. and 62ter.

Requirement from the newly adopted standard	Amendments to the AS-P	Amendments to the VVS-P
	<p>baseline for each year of the crediting period and cumulatively over the crediting period, in accordance with the applied methodologies, the applied standardized baselines and other applied methodological regulatory documents and calculate the downward adjustment, the downward adjusted baseline emissions, to compare with the conservative BAU emissions and to undertake further adjustment if the conservative BAU emissions are lower.</p>	
<p>Paragraph 11 of the leakage standard requires that methodologies contain provisions to identify potential sources of leakage, then seek to avoid or, where this is not possible, to minimize any negative leakage and subsequently calculate and subtract any remaining negative leakage.</p>	<p>In order to align the requirements of the leakage standard, paragraph 57 under section '6.6.8. Estimation of emission reductions or net removals' was redrafted.</p>	<p>Validation by the DOE of this requirement was added under section '6.2.8.8. Estimation of emission reductions or net removals', by redrafting paragraphs 64 and 65.</p>

3.2. Post-registration activities

12. Paragraph 33 of the suppressed demand standard allows activity participants to propose a new baseline if the baseline of the project at registration was identified under suppressed demand circumstances and the monitoring of the ongoing conditions of the project results in the project no longer being eligible for the baseline for which suppressed demand was recognized. A new sub-paragraph 105⁽ⁱ⁾_{bis} was added under section '7.3.3.5. Changes to the project design' of the AS-P to cover this type of post-registration change. The validation of this requirement by the DOE was added as per paragraph 104_{bis} of the section '7.2.3.5. Changes to the project design' of the VVS-P.

3.3. Implementation of the project and monitoring

13. Paragraph 3 of the appendix to the baseline standard requires methodologies to specify whether the fulfilment of specific requirements shall be assessed at validation, at first verification of emission reductions or net removals or at each verification of emission reductions or net removals. A new paragraph 116_{bis} was added under section '8.1. General requirements' of the AS-P that requires activity participants to ensure that the A6.4 project complies with the requirements of the applied methodologies that must be assessed at verification. If such assessment must be demonstrated through monitored parameters, the monitoring requirements as per paragraph 131 under section '8.8. Data and parameters' of the AS-P shall be followed. The verification by the DOE of this requirement was added as per paragraph 116_{bis} under sections '8.1.2. Other requirements' and '8.2.7. Monitoring activities' of the VVS-P.
14. Paragraph 84 of the baseline standard requires methodologies to require activity participants to compare for each calendar year of the monitoring period the ex-post calculated downward adjusted baseline and the ex-post calculated conservative business-as-usual (BAU) baseline and confirm that the downward adjusted baseline is lower than the conservative BAU baseline; otherwise, the conservative BAU baseline shall be used for that specific calendar year. These requirements have been reflected in a new paragraph 140_{bis}, under section '8.9. Calculation of emission reductions or net removals' of the AS-P. The verification by the DOE of this requirement was added under section '8.2.10. Data and calculation of emission reductions or net removals' of the VVS-P.
15. Paragraph 31 of the suppressed demand standard requires methodologies to require activity participants to monitor and reassess whether ongoing conditions continue to indicate that suppressed demand would persist in the absence of the Article 6.4 activity, using one or more indicators at the beginning of every crediting period. These requirements were added in a new paragraph 136_{bis} under section '8.8. Data and parameters' of the AS-P. The verification by the DOE of this requirement was added as per paragraph 158_{bis} under section '8.2.7. Monitoring activities' of the VVS-P.

3.4. Additional requirements added to the Article 6.4 validation and verification standard for projects

16. The previous version of the VVS-P did not include a provision to require the DOE to determine whether the activity participants have notified the prior consideration of the Article 6.4 mechanism for the project as per the 'Procedure: Article 6.4 activity cycle procedure for projects' and the AS-P. A new section '6.2.2. Notification of prior consideration of the Article 6.4 mechanism' was added to cover this requirement.

3.5. Requirements and criteria for deviation from elements and criteria of the Article 6.4 Sustainable Development Tool for projects and programmes of activities (PoAs)

17. The proposed new provisions establish requirements and criteria for activity participants to submit a deviation from specific elements and criteria of the A6.4 SD Tool, as already envisaged under the deviation process in accordance with the activity cycle procedure and relevant provisions of the Article 6.4 SD Tool.
18. The deviation process is intended to address situations where either the activity participants themselves or a DOE, during the validation or verification of a proposed A6.4 project, identify unavoidable negative impacts that exceed the environmental and social safeguard criteria. Such impacts must be demonstrated as not remediable through either stakeholder consultation or mitigation measures. In this respect, the provision creates a narrowly defined exception, ensuring that deviations are considered only where technical or financial limitations render further avoidance impossible, while preserving the overall integrity of the safeguard system.
19. The new provisions set out clear obligations for activity participants when submitting a deviation from the elements and criteria of the Article 6.4 SD Tool as follows (paragraph 31_{ter} of the AS-P):
 - (a) First, they must comprehensively identify and describe all unavoidable negative impacts across each of the 11 elements of the A6.4 SD Tool, including the implications of those impacts and the manner in which environmental and social indicators will be monitored at the activity level;
 - (b) Second, activity participants are required to provide evidence of all measures undertaken or to be undertaken to avoid such impacts, and, where complete avoidance is not feasible, to provide robust justifications as to why avoidance is not technically or financially practicable;
 - (c) Third, the provision requires evidence of measures undertaken or to be undertaken to minimize, mitigate and control the unavoidable negative impacts, accompanied by justification in cases where additional measures cannot reasonably be implemented, as well as evidence of the remediation measures undertaken or to be undertaken;
 - (d) Finally, activity participants must demonstrate that the remaining unavoidable impacts comply with the 11th preambular paragraph of the Paris Agreement, and conform with the relevant and applicable national and international instruments to which the host Party is bound, and with the applicable legislation of the host Party.
20. This cumulative set of requirements ensures that deviations are substantiated with a comprehensive evidentiary basis and anchored in legal and procedural compliance.
21. The proposed new provisions introduce further requirements with respect to stakeholder engagement (paragraph 31_{quater} of the AS-P). Activity participants are required to inform

- local stakeholders—specifically those eligible to participate in local stakeholder consultations—of the deviation and follow additional transparency requirements:
- (a) The notification of the deviation must provide all information necessary for a full and adequate understanding of the deviation, including a transparent delineation of the unavoidable negative impacts;
 - (b) The information about the deviation must be communicated in a manner that is accessible and appropriate to the affected stakeholders;
 - (c) The provision requires activity participants to invite stakeholders formally to submit comments on the deviation through an open, transparent, and non-discriminatory process that facilitates effective participation;
 - (d) Sufficient time must be provided for stakeholders to review and submit their inputs;
 - (e) Activity participants shall describe how received comments were considered in relation to the deviation.
22. The stakeholder consultation on deviation may be undertaken either separately or in conjunction with the local stakeholder consultation (LSC). In case the consultation on the deviation is undertaken in conjunction with the LSC, the activity participants shall ensure that all information related to the deviation is duly provided to the local stakeholders during the LSC.
23. The inclusion of these provisions is justified on several grounds:
- (a) First, environmental and social integrity shall be safeguarded by ensuring that deviations are treated as exceptional and are subject to strict conditions, justification, evidence, and compliance with international and national obligations;
 - (b) Second, the detailed requirements concerning avoidance, mitigation, and control measures ensure that activity participants cannot rely on a deviation as a substitute for due diligence or best efforts in environmental and social management;
 - (c) Third, the stakeholder engagement requirement ensures that transparency, inclusivity, and accountability remain central to the process, thereby preserving the legitimacy of decisions in the eyes of affected communities and the broader international community.
24. Together, these provisions ensure that the deviation mechanism functions not as an undefined exception, but as a regulated and transparent exception, aligned with the principles of the Paris Agreement and the host country's legal and policy frameworks and its international obligations.
25. The requirements are to be validated by the DOE as per the new analogical provisions introduced in the VVS (paragraphs 44_{bis}, 44_{ter}, 44_{quarter}, 44_{quinquies} of the VVS-P).

26. Temporary and permanent post-registration deviations from the elements and criteria of the Article 6.4 SD Tool are recognized in the AS and VVS. Both for temporary and permanent post-registration deviation, two types are identified:
 - (a) Deviation from the prescribed monitoring requirements under the A6.4 Environmental and Social Management Plan Form, and the A6.4 Sustainable Development Impact Form;
 - (b) Observed unavoidable negative impacts during the monitoring period that exceeded the elements identified in the A6.4 Environmental and Social Safeguards Risk Assessment Form and the indicators defined in both the A6.4 Environmental and Social Management Plan Form and the A6.4 Sustainable Development Impact Form.
27. To address the deviation from the prescribed monitoring requirements, the nature and extent of the deviation, as well as the alternative monitoring measures, shall be documented in the revised A6.4 Environmental and Social Management Plan Form, and the A6.4 Sustainable Development Impact Form with a summary of the deviation must be included in the monitoring report. The request for deviation is subject to validation by a DOE, a completeness and substantive check by the secretariat, and consideration and assessment by the Supervisory Body against the same robust requirements as any deviation from monitoring requirements.
28. Deviations due to unavoidable negative impacts during the monitoring period that exceeded the elements identified in the A6.4 Environmental and Social Safeguards Risk Assessment Form and the indicators defined in both the A6.4 Environmental and Social Management Plan Form and the A6.4 Sustainable Development Impact Form are subject to the same requirements and criteria as the pre-registration deviation. The request for deviation is subject to validation by a DOE, a completeness and substantive check by the secretariat, and consideration and assessment by the Supervisory Body against the same robust requirements as the pre-registration deviation from the elements and criteria of the A6.4 SD Tool.
29. The inclusion of the provisions of the deviation process will require revision of the Article 6.4 SD Tool forms - A6.4 Environmental and Social Safeguards Risk Assessment Form; A6.4 Environmental and Social Management Plan Form and the A6.4 Sustainable Development Impact Form - to include the new reporting requirements for deviation.

3.6. Outcome of the structured editorial and legal review

30. The revisions of both the AS-PoA and the VVS-PoA include the outcome of the structured editorial and legal review carried out by the secretariat. The revisions are mainly editorial in nature. However, a substantive change was introduced relating to the inclusion of provisions for selection of standardised baselines for a compound Projects (CP). This was introduced to ensure consistency with the AS-P and to ensure relevant requirements are complete.

4. Impacts

31. The revised AS-P and VVS-P will reflect the baseline standard, the leakage standard and suppressed demand standard, adopted by the Supervisory Body. The AS-P, VVS-P, AS-PoA and VVS-PoA revised to incorporate requirements and criteria for deviation from

elements and criteria of the A6.4 SD Tool, ensure that unavoidable negative impacts are formally recognized, justified and documented by maintaining the credibility and stringency of the A6.4 SD Tool, ensuring that it continues to function as a robust safeguard framework under Article 6.4 of the Paris Agreement, while providing flexibility for deviation.

5. Subsequent work and timelines

32. The secretariat will work on the development and revision of the relevant forms including Article 6.4 SD Tool forms (A6.4 Environmental and Social Safeguards Risk Assessment Form and the indicators defined in the A6.4 Environmental and Social Management Plan Form and the A6.4 Sustainable Development Impact Form), to enable the implementation of the new provisions.

6. Recommendations to the Supervisory Body

33. The secretariat recommends that the Supervisory Body consider and adopt the revised AS-P, VVS-P, AS-PoA and VVS-PoA as presented, with modifications as appropriate.

7. Appendices

34. List of Appendices
- (a) Appendix 1. A6.4-SBM018-AA-A06. Draft Standard. Article 6.4 activity standard for projects (version 3.0)
 - (b) Appendix 2. A6.4-SBM018-AA-A07. Draft Standard. Article 6.4 validation and verification standard for projects (version 3.0)
 - (c) Appendix 3. A6.4-SBM018-AA-A08. Draft Standard. Article 6.4 activity standard for programmes of activities (version 3.0)
 - (d) Appendix 4. A6.4-SBM018-AA-A09. Draft Standard. Article 6.4 validation and verification standard for programmes of activities (version 3.0)

Document information

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Information note: Revision of activity standards and validation and verification standards for projects and programmes of activities

Version 01.0

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		<ul style="list-style-type: none">• A6.4-SBM018-AA-A08: Draft Standard: Article 6.4 activity standard for programmes of activities.• A6.4-SBM018-AA-A09: Draft Standard: Article 6.4 validation and verification standard for programmes of activities

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