

A6.4-SBM020-AA-A06

Draft Procedure

Transition of CDM activities to the Article 6.4 mechanism

Version 07.0

DRAFT



United Nations
Framework Convention on
Climate Change

COVER NOTE

1. Procedural background

1. At its seventh session, the Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA) decided to extend the deadline to 30 June 2026 for the designated national authority for the mechanism established by Article 6, paragraph 4, of a host Party of the clean development mechanism to submit to the Supervisory Body its approval for the transition of clean development mechanism project activities or programmes of activities to the mechanism established by Article 6, paragraph.¹

2. Purpose

2. The main purpose of the revision of the “Procedure: Transition of CDM activities to the Article 6.4 mechanism” (transition procedure) is to reflect the above-mentioned CMA decision.
3. This revision of the transition procedure also includes 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.

3. Key issues and proposed solutions

4. To address the decision from -/CMA 7, it is proposed that the deadline for submission of the Host Party approval to the Supervisory Body by the designated national authority for the mechanism established by Article 6, paragraph 4, is revised from 31 December 2025 to 30 June 2026.
5. When comparing the processing of transitioning CDM activities to the Article 6.4 mechanism using a new mechanism methodology, it was observed that activity participants are given only two days to submit revised or corrected documents following the secretariat’s completeness check. This deadline differs from the 7-day period provided for new Article 6.4 activities. To ensure fairness and alignment with the two processes, it is therefore proposed to extend the deadline to 7 days for transitioning CDM activities that use a new mechanism methodology.
6. The results of the structured legal and editorial review consisted of only editorial revisions. These revisions are reflected in the draft transition procedure in green for easy identification.

4. Impacts

7. This revision of the transition procedure will ensure the prompt implementation of the --/CMA 7 decision and will ensure equal treatment of CDM projects transitioning to the Article 6.4 mechanism using a new mechanism methodology.

¹ See Decision -/CMA.7 (Advanced unedited version), paragraph 25:
https://unfccc.int/sites/default/files/resource/cma7_15b_A6.4_auv.pdf.

5. Subsequent work and timelines

8. The secretariat will take the necessary steps to operationalize and implement the provisions adopted in the revised procedure including the relevant forms.

6. Recommendations to the Supervisory Body

9. The secretariat recommends that the Supervisory Body consider and adopt the revised transition procedure.

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1. Background

1. The Conference of the Parties serving as the meeting of the Parties to the Paris Agreement (CMA), at its third session, adopted rules, modalities and procedures (RMPs) for the mechanism established by Article 6, paragraph 4, of the Paris Agreement (the Article 6.4 mechanism).¹ Chapter XI.A of the RMPs contains provisions that allow transition of project activities and programmes of activities (PoAs) (hereinafter referred to together as CDM activities) registered under the clean development mechanism (CDM) under Article 12 of the Kyoto Protocol or listed as provisional as per the temporary measures adopted by the Executive Board of the CDM² (hereinafter referred to as provisional requests) to the Article 6.4 mechanism.
2. The CMA, at its fourth session, elaborated key conditions and processes for such transition.³ At the same session, the CMA also requested⁴ the Supervisory Body to facilitate the tasks related to the transition of CDM activities to the Article 6.4 mechanism by:
 - (a) Developing and operationalizing a procedure for requesting transition, which includes relevant forms, by no later than June 2023;
 - (b) Developing and operationalizing the transition process and reporting back to the CMA at its fifth session.
3. The CMA, at its sixth session⁵, decided that afforestation and reforestation project activities and PoAs registered under the CDM may transition to the Article 6.4 mechanism, and be registered as Article 6.4 activities. The CMA also elaborated key conditions for such a transition.
4. Pursuant to its mandate from the CMA to operationalize the transition process, the Supervisory Body has adopted the “Standard: Transition of CDM activities to the Article 6.4 mechanism” (hereinafter referred to as the transition standard), and the “Procedure: Transition of CDM activities to the Article 6.4 mechanism” (hereinafter referred to as this procedure) and relevant forms as contained in this document.
5. The Supervisory Body at its 16th meeting agreed to provisions on avoidance of double issuance for provisional requests for issuance for transition activities. The Supervisory Body further decided to require the use of re-evaluated values for the fraction of non-

¹ Decision 3/CMA.3, annex, as contained in document FCCC/PA/CMA/2021/10/Add.1. Available at: https://unfccc.int/sites/default/files/resource/cma2021_10a01E.pdf.

² At its 108th meeting (see paragraphs 7–8 of the meeting report) and later clarified in the document entitled “Clarification: Regulatory requirements under temporary measures for post-2020 cases” available at: http://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20220314132358671/Reg_Clar03v02.pdf.

³ Decision 7/CMA.4, annex I, chapter I, in document FCCC/PA/CMA/2022/10/Add.2. Available at: https://unfccc.int/sites/default/files/resource/cma2023_10a02E.pdf.

⁴ Decision 7/CMA.4, paragraph 23.

⁵ Decision 6/CMA.6, “Further guidance on the mechanism established by Article 6, paragraph 4, of the Paris Agreement”. Available at: https://unfccc.int/sites/default/files/resource/cma2024_17a01E.pdf#page=34.

renewable biomass (fNRB) and the discount factor for the leakage for activities using CDM methodologies that have a risk of non-permanence of emission reductions.

6. The Supervisory Body, at its **seventeen 17th** meeting, clarified that as part of the re-evaluation of the fNRB values and leakage factors, activity participants may consider the following:
 - (a) For the fNRB, the latest available default values, such as from revised “TOOL33: Default values for common parameters” which was recently adopted by the CDM Executive Board at its 125th meeting. Activity participants may also propose new methodological approaches for calculation of fNRB values for consideration of the Supervisory Body;
 - (b) For the discount factor for addressing leakage, the latest available default values, such as the net to gross adjustment of 0.95 as that contained in the applicable CDM methodologies or conduct ex-post surveys for determining the leakage factor.
7. The Supervisory Body further noted that the approaches specified in paragraph 6 above are applicable until such time that the Supervisory Body adopts relevant tools or values under the Article 6.4 mechanism.
8. The Supervisory Body, at its **17th seventeenth** meeting, clarified that for provisional requests for issuance of CDM project activities and PoAs that successfully transition to Article 6.4 applying the CDM methodologies with risk of non-permanence:
 - (a) No new verification is required if the activity participants use default values for the fNRB and the discount factor for addressing leakage;
 - (b) A new verification is required if the activity participants choose to re-calculate the values of fNRB and leakage factor using new methodological approaches and ex-post surveys, respectively, for the fNRB and the discount factor for addressing leakage.

8bis. The CMA at its seventh session (-CMA/7 paragraph. 22)⁶ decided to extend the deadline from 31 December 2025 to 30 June 2026 for the Designated National Authority (hereinafter referred to as DNA) for Article 6.4 mechanism, of a host Party of the CDM to submit to the Supervisory Body its approval for the transition of CDM project activities or PoAs to Article 6.4 mechanism.

2. **Objective and Scope**

9. This procedure sets out procedural steps for CDM project activities, PoAs and component project activities (CPAs) therein to transition to the Article 6.4 mechanism, as well as corresponding procedural steps for provisional requests to be finalized under the Article 6.4 mechanism.

3. **Entry into force**

10. This document enters into force on **10 October 2025 DD MM YYYY**.

⁶ See Decision -/CMA.7 (Advanced unedited version), paragraph 25:
https://unfccc.int/sites/default/files/resource/cma7_15b_A6.4_auv.pdf

4. Terms and definitions

11. The following terms apply in this procedure:

- (a) “Shall” is used to indicate requirements to be followed;
- (b) “Should” is used to indicate that among several possibilities, one course of action is recommended as particularly suitable;
- (c) “May” is used to indicate what is permitted;
- (d) “The project participant” shall be read as the focal point entity designated by the project participants of the CDM ~~project~~ activity ~~or PoA~~ for scope (c) as communicated to the secretariat in the modalities of communication in accordance with the relevant provisions in the “CDM project cycle procedure for project activities” and the “CDM project cycle procedure for programmes of activities”, respectively”.⁷
- (e) “CDM project activity”, “PoA” and “CPAs” encompass CDM emission reduction and CDM A/R activities, unless otherwise specified;
- (f) “PDD”, “PoA-DD” and “CPA-DD” encompass the respective forms for CDM emission reduction and CDM A/R activities, unless otherwise specified.

5. Process for transition

5.1. Submission of a transition request

12. The project participant of a CDM ~~project~~ activity ~~or PoA~~ other than a CDM A/R project activity or CDM A/R PoA and CPAs therein, that is eligible for transition to the Article 6.4 mechanism in accordance with the relevant provisions in the transition standard shall, if it wishes for such transition, submit a ~~transition~~ request ~~for transition to indicate the wish of transition~~ to the secretariat through a dedicated interface on the UNFCCC website, providing the information in the form contained in appendix 1,⁸ by 31 December 2023, 24:00 (Central European Time).
13. The project participant of a CDM A/R project activity or CDM A/R PoA and the CPAs therein, that is eligible for transition to the Article 6.4 mechanism in accordance with the relevant provisions of the transition standard shall, if it wishes to transition, submit a request to the secretariat through a dedicated interface on the UNFCCC website. The project participant shall provide the information in the form contained in Appendix 1 by 31 December 2025, at 24:00 hours (Central European Time).

⁷ In accordance with paragraph 42 of the “CDM project cycle procedure for project activities” (version 03.0) and paragraph 33 of the “CDM project cycle procedure for programmes of activities” (version 03.0), the focal point entities designated by the project participants for scope (c) are granted the authority to communicate on their behalf with the Board and the secretariat on all other project-related matters not covered by: (a) communication in relation to requests for forwarding of certified emission reductions to individual accounts of the project participants; or (b) communication in relation to requests for addition and/or voluntary withdrawal of the project participants and focal points, as well as changes to company names, legal status, contact details and specimen signatures.

⁸ The secretariat may convert the form into an electronic interface.

14. In requesting the transition of a CDM PoA that had included CPAs under the CDM, the project participant shall specify which of the included CPAs that are eligible for transition to the Article 6.4 mechanism in accordance with the relevant provisions in the transition standard it wishes to transition to the Article 6.4 mechanism. CPAs included in a CDM PoA under the CDM may transition to the Article 6.4 mechanism in conjunction with, or subsequent to, the transition of the PoA to the Article 6.4 mechanism.
15. The secretariat shall check the completeness of the information provided in the submitted transition request for transition and, if found complete, publish the request on the UNFCCC website providing the web link to the project information page of the CDM project activity or CDM PoA on the UNFCCC CDM website, and assigning a unique reference number(s) that enable(s) the identification of the CDM project activity, or PoA and CPAs therein, transitioned to the Article 6.4 mechanism, distinguishing them from new activities registered under the Article 6.4 mechanism. If found incomplete, the secretariat shall promptly notify the reason for the incompleteness to the project participant. The project participant shall submit a corrected request for transition within 14 days of the notification; otherwise, the secretariat shall reject the request.
16. After publishing the transition request for transition on the UNFCCC website, the secretariat shall promptly inform the DNA for the Article 6.4 mechanism and the DNA for the CDM of the host Party of the CDM project activity or PoA of the receipt of the request. If the host Party has not yet established the DNA for the Article 6.4 mechanism, the secretariat shall inform its national focal point to the UNFCCC (the DNA for the Article 6.4 mechanism and the national focal point if one has not been established are hereinafter collectively referred to as the DNA for the Article 6.4 mechanism) of the request.⁹ With this, the transition request for transition shall be deemed as having been submitted by the project participants to both the secretariat and the host Party in accordance with paragraph 73(a) of the RMPs.

5.2. Global stakeholder consultation

17. Parties, stakeholders and UNFCCC admitted observer organizations may submit comments, in English, on the transition of the CDM project activity, or PoA and CPAs therein, to the secretariat through a dedicated interface on the UNFCCC website within 28 days of the publication of the transition request for transition on the UNFCCC website. The submitters of the comments shall provide the names and contact details of the individuals or organizations on whose behalf the comments are submitted. Comments from stakeholders shall:
 - (a) Be specific to the CDM project activity, or PoA and CPAs therein, being requested for transition;
 - (b) Be related to the compliance with applicable rules and regulations for transition.
18. The secretariat shall make the comments that meet the requirements in paragraph 17 above publicly available on the UNFCCC website where the transition request is displayed published and inform the Supervisory Body and the DNAs for the Article 6.4 mechanism of the host Party and other Parties involved that the comments have been made public.

⁹ The contacts of national focal points of Parties to the UNFCCC are listed at:
<https://unfccc.int/process/parties-non-party-stakeholders/parties/national-focal-point>.

19. For a CDM PoA being requested for transition, after the global stakeholder consultation but before the approval by the host Party of the transition in accordance with section 5.3 below, the project participants may:
- (a) Add eligible CPAs not specified in the initial transition request referred to in paragraph 14 above; and/or
 - (b) Remove from the transition request any CPAs specified in the initial transition request.
20. For the cases referred to in paragraph 19 above, the project participants shall submit a revised transition request to the secretariat through the dedicated interface on the UNFCCC website referred to in paragraphs 12 above or 13 above, reflecting the addition and/or removal of CPAs that they wish to transition to the Article 6.4 mechanism in conjunction with, or subsequent to, the transition of the PoA. The secretariat shall check the completeness of the revised transition request and, if it is found to be complete, shall publish it on the UNFCCC website, replacing the initial transition request, and promptly inform the DNAs for the Article 6.4 mechanism and the DNAs for the CDM of the host Parties of the receipt of the revised transition request. The revised transition request is not required to undergo a new global stakeholder consultation.

5.3. Submission of host Party approval

21. The host Party of the CDM project activity, or PoA and CPAs therein, regarding which a **transition** request ~~for transition~~ has been published on the UNFCCC website shall, if it approves such transition, submit an approval of transition from its DNA for the Article 6.4 mechanism to the Supervisory Body through a dedicated interface on the UNFCCC website, providing the information in the form contained in appendix 2,¹⁰ by **31 December 2025 30 June 2026**, 24:00 (Central European **Summer** Time).
22. The least developed countries (LDCs) and small island developing States (SIDS) may include information, either when submitting their participation requirements to the Article 6.4 mechanism or at the approval stage of an activity, on whether they choose not to exempt the CDM project activity or PoA and CPAs therein, hosted in their territories and requesting transition, from the share of proceeds for adaptation.
23. Notwithstanding paragraph 22 above, if an LDC or SIDS host Party has already submitted its participation requirements or provided approval for a CDM project activity or PoA and CPAs therein hosted in their territories and requesting transition, by the time of entry of force of version 4 of this procedure, the LDCs and SIDS, may provide information on whether they choose not to exempt the CDM project activity or PoA and CPAs therein from the share of proceeds for adaptation by resubmitting the participation requirements and/or the approval form at the latest by **31 December 2025 30 June 2026** or at first issuance, whichever is earlier. If no such information is received by the deadline, the exemption from the share of proceeds for adaptation shall be effected.

¹⁰ The secretariat may convert the form into an electronic interface.

24. A multi-country PoA¹¹ may transition to the Article 6.4 mechanism provided that at least one host Party has provided approval within the deadline referred to in paragraph 21 above. If there is more than one host Party for a CDM PoA¹² being requested for transition, only the CPAs in the host Parties that have submitted an approval of transition by the deadline may transition to the Article 6.4 mechanism in conjunction with, or subsequent to, the transition of the PoA.
25. The project participant or **Designated Operational Entity (DOE)** (hereinafter collectively referred to as the proponent) may proceed with the submission of the additional documentation referred to in section 5.4 below after at least one host Party has submitted an approval of transition. If the proponent wishes to transition any of the CPAs specified in the transition request subsequent to the transition of the CDM PoA, the proponent shall prepare the additional documentation referred to in section 5.4 below for each such transition request of CPAs.
26. The host Party may submit an approval of transition only after it has fulfilled the requirements for participating in the Article 6.4 mechanism referred to in paragraph 26 of the RMPs by demonstrating the fulfilment in accordance with the relevant provisions in the “Article 6.4 activity cycle procedure for projects” or the “Article 6.4 activity cycle procedure for programmes of activities”, as applicable.
27. If the host Party approves the transition, it shall provide a statement of authorization on the use of A6.4ERs to be issued for the project or PoA and CPAs therein as early as possible but prior to the first issuance of A6.4ERs for the project, PoA and CPAs therein.¹³ The host Party shall provide such a statement by completing a form, through a dedicated interface on the UNFCCC website.
28. If the host Party has indicated that it allows mitigation contribution A6.4ERs to be issued for the project or PoA and CPAs therein, while noting that it may authorize the A6.4ERs at a later stage, the respective rules and requirements shall be applied as per the respective provisions of the procedures “Procedure: Article 6.4 activity cycle procedures for projects” and “Procedure: Article 6.4 activity cycle procedure for programmes of activities”.
29. The secretariat shall publish the host Party approval of transition on the UNFCCC website and promptly inform the project participant of the receipt of such approval.

5.4. Submission of additional documentation

30. If the project participant continues to apply the currently applied CDM methodology to the transitioning CDM project activity, or PoA and CPAs therein, in accordance with the relevant provisions in the transition standard, it shall, no later than 31 December 2026,

¹¹ Under the CDM, a PoA may be designed beyond the border of a country and thus could have more than one host Party, while a project activity shall be designed within the border of a country and thus will always have only one host Party.

¹² Under the CDM, a PoA may be designed beyond the border of a country and thus could have more than one host Party, while a project activity shall be designed within the border of a country and thus will always have only one host Party.

¹³ As per decision 6/CMA.6. Further guidance on the mechanism established by Article 6, paragraph 4, of the Paris Agreement. Available at: https://unfccc.int/sites/default/files/resource/cma2024_17a01E.pdf#page=34.

submit to the secretariat, through a dedicated interface on the UNFCCC website, an addendum to the respective project design document (PDD), or PoA design document (PoA-DD) and CPA design documents (CPA-DDs), using the form contained in appendix 3¹⁴ to attest that the CDM project activity, or PoA and CPAs therein, have been implemented in accordance with the registered PDD, or PoA-DD and CPA-DDs, as well as to demonstrate the compliance with additional requirements for registration under the Article 6.4 mechanism in accordance with the relevant provisions in the transition standard. With the attestation in the addendum, the relevant PDD, or PoA-DD and CPA-DDs, shall be deemed submitted by the project participant.

31. Notwithstanding paragraph 30 above, for CDM A/R project activities or CDM A/R PoAs and the CPAs therein that have successfully transitioned to the Article 6.4 mechanism, the PPs shall request a designated operational entity (DOE) accredited in the relevant sectoral scope under the Article 6.4 mechanism to validate and assess compliance of the additional documentation with the respective applicable requirements for activities involving removals under the mechanism contained in the standard “Requirements for activities involving removals under the Article 6.4 mechanism” and other applicable methodological regulatory documents approved by the Supervisory Body. This validation shall occur in conjunction with verification for first issuance.
32. If the project participant voluntarily replaces, or is required to replace, the CDM methodology currently applied to the transitioning CDM project activity, or PoA and CPAs therein, with an Article 6.4 mechanism methodology (hereinafter referred to as a mechanism methodology) in accordance with the relevant provisions in the transition standard, it shall revise the PDD, or PoA-DD and CPA-DDs, accordingly, using the corresponding forms developed for Article 6.4 mechanism activities, and request a designated operational entity (DOE) accredited in the relevant sectoral scope under the Article 6.4 mechanism to validate them to demonstrate appropriate application of the mechanism methodology and the compliance with additional requirements for registration under the Article 6.4 mechanism in accordance with the relevant provisions in the transition standard. If the validation outcome is positive (i.e. the mechanism methodology is appropriately applied and the compliance with additional requirements for registration under the Article 6.4 mechanism is demonstrated), the DOE shall, within one year of the publication of the host Party approval of transition in accordance with paragraph 29 above or within one year after the applicable mechanism methodology becomes available, whichever is later, submit to the secretariat, through a dedicated interface on the UNFCCC website, the revised PDD, or PoA-DD and CPA-DDs, as well as the validation report¹⁵.

5.5. Processing of a transition request

33. The secretariat shall, upon receipt of the additional documentation referred to in paragraph 30 or 32 above, issue a statement of the transition fee due, determined based on the following principles, and shall communicate it to the project participant or the DOE who

¹⁴ The secretariat may convert this form into an electronic interface for the submission of the addendum.

¹⁵ Prepared by the DOE in accordance with the Standard: Article 6.4 validation and verification standard for projects, A6.4-STAN-AC-003, or the Standard: Article 6.4 validation and verification standard for programmes of activities, A6.4-STAN-AC-005, as applicable.

submitted the additional documentation (hereinafter collectively referred to as the proponent):

- (a) ~~Transition Requests~~ transition of CDM project activities, or PoAs and CPAs ~~therein~~ are subject to the share of proceeds applicable to requests for registration of projects and PoAs and inclusion of component projects (CPs), respectively, under the Article 6.4 mechanism;¹⁶
 - (b) All fees for requests for registration, issuance, renewal and post-registration changes to project activities and PoAs ~~as well as~~ and inclusion of CPs under the Article 6.4 mechanism are waived for activities in least developed countries and small island developing States.¹⁷
34. The project participant shall pay the transition fee by bank transfer, quoting the unique reference number(s) referred to in paragraph 15 above. The project participant shall submit a proof of payment (e.g. bank transfer record) through a dedicated interface on the UNFCCC website.
35. The paid transition fee may be reimbursed in full or partially if the request for transition is withdrawn by the proponent in accordance with section 7 below or rejected by the Supervisory Body in line with the corresponding provisions on the reimbursement of the registration fee as contained in the “Article 6.4 activity cycle procedure for projects” or the “Article 6.4 activity cycle procedure for programmes of activities”.
36. The secretariat shall, upon receipt of the proof of payment of the transition fee if it is due, or upon receipt of the additional documentation if the transition fee is not due, commence the completeness check of the additional documentation for transition requests for CDM project activity, or PoA and CPAs ~~therein~~ for which the host Party(ies) provided approval as per section 5.3 above. To commence the completeness check, the secretariat shall prioritize requests for transition for small-scale CDM ~~project activities~~ and CDM PoAs.
37. The secretariat shall conclude the completeness check within seven days of its commencement. If, during the completeness check, the secretariat identifies issues of an editorial nature ~~(that do not constitute a substantive revision)~~ or of consistency in the documentation, it shall request the proponent to submit revised documents to correct them. In this case, the proponent shall submit the requested documents within two days of receipt of the request ~~for CDM activities continuing to apply CDM methodologies and within seven days of receipt of the request for activities applying new Article 6.4 methodologies.~~ Upon receipt of the revised documents, the secretariat shall resume¹⁸ the completeness check. If the proponent does not submit the requested documents by this deadline, the secretariat shall conclude that the request submission is incomplete and inform the proponent that the request for transition cannot be processed any further. The proponent may restart the process by submitting the additional documentation again with the revised documents in accordance with section 5.4 above, which is subject to a new transition fee.

¹⁶ In accordance with decision 7/CMA.4, annex I, paragraph 14(a).

¹⁷ In accordance with decision 7/CMA.4, annex I, paragraph 58.

¹⁸ The same deadlines apply to the resumed completeness check as applicable to the initial completeness check.

38. Upon positive conclusion of the completeness check, the secretariat shall commence the substantive check of the additional documentation to determine whether the transitioning CDM project activity, or PoA and CPAs therein, complies with the relevant requirements for transition contained in the transition standard within 21 days of its commencement. Upon conclusion of the substantive check, the secretariat shall publish the additional documentation, and indicate the completion of the substantive check on the UNFCCC website and notify the host Party and the Supervisory Body of the completion of the substantive check to initiate the review process in accordance with section 5.6 below. If, during the substantive check, the secretariat identifies substantive issues that may be resolved by revising the additional documentation, it shall request the proponent to submit revised documents to resolve them. In this case, the proponent shall submit the requested documents within seven days of receipt of the request. Upon receipt of the revised documents, the secretariat shall resume¹⁹ the substantive check. If the proponent does not submit the requested documents by this deadline, the secretariat shall conclude that the request submission is incomplete and inform the proponent that the request for transition cannot be processed any further.
39. The secretariat shall prepare and send to the Supervisory Body, within 14 days of the date of publication of the additional documentation, a summary note on the transition request, summarizing its findings in respect of the compliance with the relevant requirements for transition contained in the transition standard and including its recommendation whether to approve the requested transition within 14 days of the date of publication of the additional documentation.

5.6. Requesting a review of a transition request

40. The host Party of the transitioning CDM project activity or PoA, or any member or alternate member of the Supervisory Body, may request a review of the transition request for transition within 28 days of receipt of the notification of the completion of the substantive check in accordance with paragraph 38 above, through a dedicated interface on the UNFCCC website, providing reasons for requesting a review.
41. If a review of the transition request for transition is requested by the host Party or any member or alternate member of the Supervisory Body, the secretariat shall:
- (a) Notify the proponent that the request is under review;
 - (b) Indicate such status on the UNFCCC website, and request the project participant and/or the DOE to:
 - (i) Provide responses to the issues identified in the request for review no later than seven days from the date of notification that the request has been placed under review;
 - (ii) For each issue (or sub-issue) raised in the request for review, the project participant and/or the DOE (if applicable) shall either:
 - a. Respond by making any revisions that they deem necessary to the relevant documentation, submitting revised documents in track changes and final versions; or

¹⁹ The same deadlines apply to the resumed completeness check as applicable to the initial completeness check.

- b. Respond in writing, explaining why no revisions to the documentation are necessary.

- 42. The secretariat shall present the case to the Supervisory Body at its next meeting or electronically.
- 43. For cases applying a new Article 6.4 methodology, as set out in paragraph 32 above, the review process shall follow the procedures specified in the “Article 6.4 activity cycle procedure for projects” and the “Article 6.4 activity cycle procedure for PoAs”, as applicable.

5.7. Finalizing a transition request

- 44. If no review of the transition request for transition is requested by the deadline referred to in paragraph 40 above, the transition request for transition shall be deemed approved by the Supervisory Body.
- 45. Stakeholders, project participants, the host Party or other participating Parties (hereinafter referred to as “eligible individuals, communities and organizations that have standing for filling an appeal”) may, in accordance with the appeal and grievance procedure,²⁰ file an appeal to the Supervisory Body’s decision to approve the transition²¹ within 28 days of the request for transition being deemed approved. If no appeal is filed by an eligible stakeholder, project participant or Party within this time frame, the transition shall be deemed final. If an appeal is filed by an eligible stakeholder, project participant or Party within this time frame, the appeal and grievance procedure shall be followed.
- 46. If a review of the transition request for transition is requested, the Supervisory Body shall review the request and take one of the following decisions, taking into account the presentation on the case by the secretariat:
 - (a) Approve the request;
 - (b) Conditionally approve the request, provided that the project participants agree to the modifications to the additional documentation proposed by the Supervisory Body;
 - (c) Reject the request.
- 47. For the case referred to in paragraph 46(b) above, if the proponent does not agree with the modification within seven days of the decision, the request shall be deemed rejected by the Supervisory Body.
- 48. The secretariat shall notify the proponent (including the DOE, if applicable) and the DNA of the decision of the Supervisory Body to the proponent, the host Party and the DOE (if applicable), and indicate it on the UNFCCC website.

²⁰ “Procedure: Appeal and grievance processes under the Article 6.4 mechanism” (A6.4-PROC-GOV-006). See Available at <https://unfccc.int/sites/default/files/resource/A6.4-PROC-GOV-006.pdf>.

²¹ For decision on finalization of the provisional request for issuance the deadline for appeal is 14 days as per the “Procedure: Appeal and grievance processes under the Article 6.4 mechanism”.

49. If the decision of the Supervisory Body is to reject the transition request for transition, the proponent may not resubmit a request for transition request of the same CDM project activity, or PoA and CPAs therein.
50. If the decision of the Supervisory Body is to approve the transition of the CDM project activity, or PoA and CPAs therein, the secretariat shall inform the Executive Board of the CDM of the decision. The secretariat shall register the activity under the Article 6.4 mechanism, to be effective on the day it is deregistered from the CDM.
51. Eligible stakeholders, project participants and Parties may, in accordance with the appeal and grievance procedure, file an appeal against the decision of the Supervisory Body within 28 days of the decision²². If no appeal is filed by an eligible stakeholder, project participant or Party within this time frame, the decision of the Supervisory Body shall be deemed final. If an appeal is filed by an eligible stakeholder, project participant or Party within this time frame, the appeal and grievance procedure shall be followed.
52. Irrespective of the effective date of transition, the crediting period of the transitioned project activity and CPAs as well as the PoA period of the transitioned PoA under the Article 6.4 mechanism shall start from 1 January 2021.
53. Once registered under the Article 6.4 mechanism, the transitioned project activities, PoAs and CPAs for which the host Party(ies) provided approval as per section 5.3 above shall be subject to all relevant requirements under the Article 6.4 mechanism at all subsequent steps in the activity cycle of the Article 6.4 mechanism, taking into account the relevant provisions in the transition standard.
54. For a multi-country PoA that has transitioned to the Article 6.4 mechanism, if the transition is processed without having an approval of transition by all host Parties:
- (a) Any remaining host Parties may be added to the PoA and the CPAs hosted in those countries may transition to the Article 6.4 mechanism after the transition of the PoA in accordance with paragraph 24 above;
 - (b) If any remaining host Parties miss the deadline for providing do not provide an approval of transition referred to in paragraph 21 above within the deadline, addition of these host Parties to the PoA is still possible by undergoing the post-registration change process²³ under the Article 6.4 mechanism, but the CPAs hosted by these countries and included in the transition request may no longer transition to the Article 6.4 mechanism;
 - (c) A new host Party may be added to the transitioned PoA in accordance with the relevant provisions under the Article 6.4 mechanism.

²² See footnote 18.

²³ In accordance with the Procedure: Article 6.4 activity cycle procedure for programmes of activities, A6.4-PROC-AC-003, and the Standard: Article 6.4 activity standard for programmes of activities, A6.4-STAN-AC-004.

6. Process for finalizing provisional requests

55. Process for finalization of provisional requests shall follow the provisions in section 5 above, mutatis mutandis, with the following modifications:

- (a) The project participant may submit a request for finalization of a provisional request for issuance under ~~the transition this~~ procedure if the underlying CDM ~~project activity or PoA~~ continues to apply the currently applied CDM methodology at transition, and only after the Supervisory Body has approved the transition of the underlying CDM project activity, or PoA and CPAs therein, to the Article 6.4 mechanism. In this case, the deadline for submission for the transition request referred to in paragraph 12 above is not applicable and additional documentation to be submitted in accordance with paragraph 30 above shall be:
 - (i) A revised monitoring report (including a version in track-changes and emission reductions calculation spreadsheet) instead of an addendum to the PDD, or PoA-DD and CPA-DDs, recalculating the emission reductions by applying:
 - a. The global warming potentials for the period from 1 January 2021 as specified in the transition standard; and
 - b. The updated fraction of non-renewable biomass (fNRB) value and the discount factor for addressing leakage in accordance with the requirements of transition standard for activities using CDM methodologies that have a risk of non-permanence of emission reductions.
 - (ii) A declaration on avoidance of double issuance including, when the activity has been registered or is registered under another scheme, a confirmation from the other crediting scheme that the same GHG emission reductions or net GHG removals being requested for issuance as A6.4ERs have not been credited and have not been requested for crediting under the other crediting scheme using a form published on the UNFCCC website²⁴.
- (b) In case the activity participants of activities using CDM methodologies that have a risk of non-permanence of emission reductions apply default values²⁵ for the updated fNRB value and the discount factor for addressing leakage, no new verification is required and only the documentation referred to in paragraph 55(a) above is required.
- (c) A DOE validation of the new values is required in case the activity participants of activities using CDM methodologies that have a risk of non-permanence of emission reduction choose to re-calculate²⁶ the values of fNRB and leakage factor using new methodological approaches and ex-post surveys, respectively. The

²⁴ The forms are available on the UNFCCC website at <https://unfccc.int/process-and-meetings/bodies/constituted-bodies/article-64-supervisory-body/rules-and-regulations>.

²⁵ Please refer to paragraph 37 of the transition standard.

²⁶ Please refer to paragraph 37 of the transition standard.

DOE shall then submit a new verification report, with the request for provisional issuance in addition to the documentation referred to in paragraph 55(a) above.

- (d) Provisional inclusion of CPAs may be finalized if the underlying CDM PoA continues to apply the currently applied CDM methodology at transition, and only in conjunction with, or subsequent to, ~~with~~ the transition of the CDM PoA to the Article 6.4 mechanism. For this reason, the project participant shall include provisionally included CPAs in the request for transition of the underlying CDM PoA in accordance with section 5 above;
- (e) For finalization of the provisional request for issuance²⁷ and the provisional inclusion of CPAs²⁸ referred to in subparagraphs (a) and (d) above, respectively, an approval of the finalization by the host Party shall not be required; therefore, section 5.3 above shall be skipped;
- (f) The project participant may not submit a request for finalization of the following provisional requests, noting that the corresponding requests may be submitted under the Article 6.4 mechanism in accordance with the relevant requirements and processes applicable to any Article 6.4 mechanism activities, after the Supervisory Body has approved the transition of the underlying CDM project activity, or PoA and CPAs therein, to the Article 6.4 mechanism:
 - (i) Provisional requests for issuance if the underlying CDM project activity, or PoA and CPAs therein, voluntarily replaced, or ~~were was~~ required to replace, the currently applied CDM methodology with a mechanism methodology in accordance with paragraph 32 above;
 - (ii) Provisional requests for renewal;
- (g) The fee for finalization of a provisional request shall be determined based on the following principles:²⁹
 - (i) Requests for finalization of provisional requests for registration of ~~CDM project activities and PoAs~~ are subject to the share of proceeds applicable to requests for registration of ~~projects and PoAs activities~~, respectively, under the Article 6.4 mechanism;
 - (ii) Requests for finalization of provisional inclusion of CPAs are subject to the share of proceeds applicable to inclusion of CPs in a registered PoA under the Article 6.4 mechanism;

²⁷ A request for finalization of a provisional request for issuance may be finalized after the underlying CDM project activity, or after the underlying PoA and CPAs therein, has successfully transitioned to the Article 6.4 mechanism in accordance with paragraph 55(a) above, for which the host Party approval has been provided.

²⁸ A request for finalization of a provisional inclusion of a CPA may be finalized only in conjunction with, or subsequent to, the underlying PoA has successfully transitioned to the Article 6.4 mechanism in accordance with paragraph 55(d) above, for which the host Party approval has been provided.

²⁹ Pursuant to decision 7/CMA.4, annex I, paragraphs 14(b)-(e) and 58, available at https://unfccc.int/sites/default/files/resource/cma2023_10a02E.pdf.

- (iii) Requests for finalization of provisional requests for issuance are subject to the share of proceeds applicable to requests for issuance under the Article 6.4 mechanism;
- (iv) All fees for requests for registration, issuance, renewal and post-registration changes to project activities and PoAs **as well as and** inclusion of CPs under the Article 6.4 mechanism are waived for activities in least developed countries and small island developing States.

7. Withdrawal of **a transition request**

7.1. Submission of **a request for withdrawal**

56. The proponent may submit a request for withdrawal of a **transition** request **for transition** to the secretariat through a dedicated interface on the UNFCCC website.

7.2. Processing of request for withdrawal

57. **Promptly Upon** receipt of the request for withdrawal of a request for transition, the secretariat shall check the information provided in the request **as soon as possible**, and if the request is complete, the secretariat shall reimburse the transition fee, if applicable, and take the following actions:
- (a) If the proponent requests the withdrawal prior to the publication of the additional documentation **made** in accordance with paragraph 38 above, the secretariat shall not mark the transition request as “withdrawn” on the UNFCCC website;
 - (b) If the proponent requests the withdrawal after the publication of the additional documentation **made** in accordance with paragraph 38 above, the secretariat shall mark the transition request as “withdrawn” on the UNFCCC website.

Appendix 1. Form for a transition request

 CDM activity transition request form¹ (Version 02.0)	
Type of transition request (Tick box(es))	☐ Transition of CDM activity ☐ Finalization of provisional request ² ☐ For registration ☐ For inclusion of (a) CPA(s)
Type of activity (Tick box(es))	☐ Project activity ☐ Programme of activities (PoA) ☐ Including component project activities (CPAs) ³
Title and UNFCCC reference number of activity	DRAFT
Host Party(ies)	
Crediting period type and expiry date of the current crediting period (for a project activity or PoA) (Tick box(es)) (Indicate the hypothetical expiry date under the CDM rules in the DD/MM/YYYY format)	☐ Renewable ☐ In the first crediting/PoA period expiring on _____ ☐ In the second crediting/PoA period expiring on _____ ☐ In the third crediting/PoA period expiring on _____ ☐ In the fourth PoA period expiring on _____ <i>(applicable only for PoAs)</i> ☐ Fixed, expiring on _____

¹ This form is to be filled, signed and submitted by the person authorized for scope (c) by the project participants of the CDM project activity or PoA as indicated in the modalities of communication submitted in accordance with the “CDM project cycle procedure for project activities” or “CDM project cycle procedure for programmes of activities” to the secretariat and to the host Party(ies) of the project activity or PoA by no later than 31 December 2023. The secretariat may convert this form into electronic interface for submission of transition requests, in which case, the signature will be replaced with electronically secure means.

² Provisional requests for renewal will not be finalized under the transition process. Therefore, this form is not relevant.

³ CPAs already included in a CDM PoA may transition to the Article 6.4 mechanism only in conjunction with, or subsequent to, the transition of the PoA. Therefore, this box must be ticked if the project participant wishes the CPAs to also transition to the Article 6.4 mechanism.

	CPA ref. #	Crediting period type (renewable or fixed)	Expiry date of the current crediting period
Crediting period type and duration of activity (for CPAs) (Tick box(es)) (Add rows as needed)			
Applied methodology (Tick boxes)	☐ Continue to apply the currently applied CDM methodology at transition ☐ Replace the currently applied CDM methodology with an Article 6.4 mechanism methodology at transition ☐ For project activity ☐ For both PoA and all CPAs ☐ For only PoA⁴		
I confirm that the crediting period or the PoA period of the activity was active as of 1 January 2021 and hereby submit request for transition to the Article 6.4 mechanism	Date (DD/MM/YYYY):		
	Names of the entity and the representative of the project participants: ⁵		
	Signature:		

⁴ For a PoA requesting transition, it is possible to voluntarily replace the currently applied CDM methodology with an Article 6.4 mechanism methodology at transition only for the PoA, while continuing to apply the currently applied CDM methodology for CPAs until either the end of the current crediting period or 31 December 2025, whichever is earlier.

⁵ Please write the name of the focal point entity designated by the project participants of the CDM project activity or PoA for scope (c) and the name of its representative as communicated to the secretariat in the modalities of communication in accordance with the relevant provisions in the “CDM project cycle procedure for project activities” or the “CDM project cycle procedure for programmes of activities”, respectively.

Appendix 2. Form for host Party approval

 CDM activity transition to Article 6.4 mechanism approval form¹ (Version 03.1)	
Type of transition request (Tick box(es))	☐ Transition of CDM activity ☐ Finalization of provisional request for registration ²
Type of activity (Tick box(es))	☐ Project activity ☐ Programme of activities (PoA) ☐ Including component project activities (CPAs) ³
Title and UNFCCC reference number of activity	
Confirmation of receipt of transition request (Tick box to confirm)	☐ Yes ☐ No
Confirmation on activity type (Tick box to confirm)	☐ The type of activity in the transition request is among the activity types that the host Party intends to approve as Article 6.4 mechanism activities ⁴

¹ This form is to be filled, signed and submitted by the representative of the designated national authority for the Article 6.4 mechanism as notified to the UNFCCC secretariat by no later than **31 December 2025** **30 June 2026**. The secretariat may convert this form into an electronic interface for the submission of the host Party approval, in which case, the signature will be replaced with electronically secure means.

² Provisional requests for renewal will not be finalized under the transition process. Therefore, this form is not relevant **to such requests**.

³ CPAs already included in a CDM PoA may transition to the Article 6.4 mechanism only in conjunction with, or subsequent to, the transition of the PoA. Therefore, this box must be ticked if the host Party also approves the transition of the CPAs to the Article 6.4 mechanism.

⁴ In accordance with paragraph 26(e) of the annex to decision 3/CMA.3, the host Party shall indicate publicly to the Supervisory Body the types of Article 6.4 mechanism activity that it would consider approving and how such types of activity and any associated emission reductions would contribute to the achievement of its nationally determined contribution, if applicable, its long-term low greenhouse gas emission development strategy, if it has submitted one, and the long-term goals of the Paris Agreement. Paragraph 6 of annex I to decision 7/CMA.4 further elaborates **and** that CDM project activities, PoAs and **the** CPAs therein, and activities in provisional requests that may transition to the Article 6.4 mechanism shall be among the activity types indicated by the host Party.

Exemption from the waiver for share of proceeds for adaptation for LDCs and SIDS⁵	Is the Project or PoA hosted in a LDC or SIDS: ☐ Yes ☐ No
	☐ The host Party chooses not to exempt the CDM project activities or PoAs and CPAs therein requesting transition from the share of proceeds for adaptation
Approving host Party	
I hereby approve the transition of the CDM activity to, or finalization of the provisional request under, the Article 6.4 mechanism, subject to approval by the Supervisory Body	Date (DD/MM/YYYY):
	Name of designated national authority organization:
	Name of representative of designated national authority:
	Signature:

⁵ This provision is only applicable to LDCs and SIDS and is to be checked if the LDC/SIDS hosting the CDM project activities or PoAs and CPAs therein chooses not to exempt the CDM project activities or PoAs and CPAs therein requesting transition from the share of proceeds for adaptation.

Appendix 3. Form for **an** addendum

 Addendum to design document for CDM activity transition request¹ (Version 03.0)	
Title and UNFCCC reference number of activity	
Environmental and social impacts²	<i>Provide a summary of the environmental and social impacts and sustainable development benefits of the transitioning clean development mechanism (CDM) activity, and attach to this form a report prepared in accordance with the “Standard: Transition of CDM activities to the Article 6.4 mechanism” (hereinafter referred to as “transition standard”):</i> 1. Environmental impacts 2. Social impacts 3. Sustainable development benefits
Non-permanence risk	☐ The transitioning activity uses fossil fuel for co-firing or as a backup fuel

¹ This form is to be filled in, signed and submitted by the person authorized for scope (c) by the project participants of the clean development mechanism (CDM) project activity or programme of activities, as indicated in the modalities of communication submitted in accordance with the “CDM project cycle procedure for project activities” or “CDM project cycle procedure for programmes of activities” to the secretariat no later than 31 December 2026 in accordance with the “Procedure: Transition of CDM activities to the Article 6.4 mechanism”. The secretariat may convert this form into an electronic interface for the submission of this document, in which case the signature will be replaced with electronically secure means.

² If the SD tool is applicable at the time of submission of the additional documentation, the PPs shall submit the compulsory forms as attachments to this addendum.

	<i>If this box is ticked, describe the monitoring plan to account for emissions from the use of fossil fuel in accordance with the transition standard.</i> ☐ The transitioning activity applies one or more of the CDM methodologies listed as having a risk of negative emission reductions in paragraph 35 of the transition standard <i>If this box is ticked, describe (i) the outcome of the assessment to determine whether there was any accrual of net negative emission reductions in the past; and (ii) the monitoring plan to take into account such negative emission reductions in emission reductions occurring from 2021 in accordance with the transition standard.</i> ☐ The transitioning activity applies one or more of the CDM methodologies listed as having a risk of non-permanence in paragraph 36 of the transition standard ☐ <i>The fraction of non-renewable biomass (fNRB) value will be re-evaluated based on the latest available data and information as per the requirements of the transition standard and applied at first issuance.</i> ☐ <i>The discount factor for addressing leakage will be re-evaluated based on the on latest available data and information as per the requirements of the transition standard and applied at first issuance.</i> ☐ The transitioning activity is none of the above
Compliance with the registered design document, including the application of the currently applied CDM methodology <i>Tick the applicable box</i>	☐ No post-registration change (PRC) occurred since 2021: I hereby confirm that the transitioning CDM activity has been implemented and monitored in accordance with the registered project design document (PDD), or programme of activities design document (PoA-DD) and component project activity design documents (CPA-DDs), as displayed on the project information page on the UNFCCC CDM website, including the application of the currently applied CDM methodology. ☐ A PRC occurred since 2021: I hereby confirm that I will seek approval of the PRC to the transitioning CDM activity under the mechanism established by Article 6, paragraph 4, of the Paris Agreement (Article 6.4 mechanism) after its transition to the Article 6.4 mechanism, noting that the PRC may not be approved by the Supervisory

	Body for the Article 6.4 mechanism. This may impact the crediting of Article 6, paragraph 4, emission reductions for the activity occurring after the PRC.
Compliance with provisions of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” (Only applicable to A/R CDM project activities and A/R CDM A/R programmes of activities and component project activities therein)	☐ Identification of risk of reversals: (Include the identification and justification of the risks of reversals that may be attributed to the CDM A/R project activity or CDM A/R PoA and CPAs herein, aligned with the provisions of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” and other applied methodological regulatory documents approved by the Supervisory Body) ☐ Reversal risk assessment: (Provide a reversal risk assessment in accordance with the relevant requirements of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” and other applied methodological regulatory documents approved by the Supervisory Body) ☐ Reversal risk mitigation plan: (If a risk of non-permanence is identified, develop and implement a risk mitigation plan to address any risks identified through the reversal risk assessment, following the relevant provisions of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” and other applied methodological regulatory documents approved by the Supervisory Body) ☐ Remediation of reversals: (Describe the measures to be implemented to remediate reversals, including proactively mitigating reversal risks and avoiding reversals as per the requirements of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” and other applied methodological regulatory documents approved by the Supervisory Body) ☐ Post-crediting period monitoring plan: (Describe the monitoring to be conducted after the end of the last active crediting period of the A/R CDM A/R project activity and CDM A/R PoA and CPAs therein, to assess whether any reversals have occurred, in accordance with the requirements of the “Standard: Requirements for activities involving removals under the Article 6.4 mechanism” and other applied methodological regulatory documents approved by the Supervisory Body)
	Date (DD/MM/YYYY):

I confirm that the information provided in this form is correct	Names of the entity and the representative of the project participants: ³
	Signature:

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Document information

<i>Version</i>	<i>Date</i>	<i>Description</i>
07.0	2 February 2026	Published as an annex to the annotated agenda of SBM 020. Revision to reflect: • -/CMA7 relating to approval by host Parties of CDM activities transitioning to the Article6.4 mechanism; • The outcome of the structured legal and editorial review.
06.1	3 November 2025	Editorial revision to the cross-references in paragraph 55 (c) and footnote 22.
06.0	10 October 2025	SBM 018, Annex 11. Revision to: • Extend the deadline for submission of the additional documentation for activities continuing to apply CDM methodologies; • Incorporate provisions related to the re-evaluation of fNRB and leakage factor for provisional requests for issuance of CDM project activities and programmes of activities that successfully transitioned to Article 6.4 applying CDM methodologies with risk of non-permanence.
05.1	30 July 2025	Editorial revision to the appendices to ensure consistency.
05.0	16 May 2025	SBM 016, Annex 11. Revision to incorporate provisions on avoidance of double issuance for provisional requests for issuance for transition activities and updated requirements for activities following CDM methodologies that have a risk of non-permanence of emission reductions.
04.3	5 March 2025	Editorial revision to correct paragraph numbering and respective cross references.

³ Please write the name of the focal point entity designated by the project participants of the CDM project activity or PoA for scope (c) and the name of its representative as communicated to the secretariat in the modalities of communication in accordance with the relevant provisions in the “CDM project cycle procedure for project activities” or the “CDM project cycle procedure for programmes of activities”, respectively.

<i>Version</i>	<i>Date</i>	<i>Description</i>
04.2	25 February 2025	Editorial revision to appendixes 2 and 3 to improve consistency.
04.1	18 February 2025	Editorial revision to paragraph 26 to improve the clarity of the sentence.
04.0	14 February 2025	SBM 015, Annex 8 Revision to: • Introduce a process for submitting and considering transition requests for CDM A/R project activities, PoAs, and CPAs, aligning with CMA.6 decision; • Introduce a process of authorization of the use of A6.4ERs for transitioning activities; • Introduce provisions for LDCs and SIDS to optionally choose not to make use of the exemption from share of proceeds for adaptation for transitioning activities; • Extend deadlines for submission of revised documents during substantive checks; • Provide opportunity to respond to review issues; • Include appeal and grievance provisions; • Make editorial improvements.
03.0	18 July 2024	SBM 013, Annex 1. Revision to: • Amend the requirements for the transition of multi-country PoAs; • Provide provisions for revising and withdrawing a transition request.
02.0	2 November 2023	SB 008, Annex 8 Revision to: • Add a form for addendum to be used for submitting additional documentation as part of a transition request; • Make editorial improvement.
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