

Perception and Readiness for Gender & Social Inclusion in Article 6

A market survey



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Executive Summary

This report examines how **Gender Equality and Social Inclusion (GESI)** considerations are currently being integrated into voluntary cooperation through the carbon market mechanisms established under Article 6 of the Paris Agreement, particularly for Article 6.2 cooperative approaches, which are not centrally managed by the UNFCCC Secretariat. It reviews the

current state of practice and captures perspectives from both the host (seller) country and buyer countries. The report is intended for policymakers and stakeholders in both sides of the market, providing guidance on how to align carbon market activities with the Paris Agreement's safeguard obligations.

Key findings:

Fragmented guidance but growing recognition: The literature review found that while awareness of GESI in climate action is increasing, approaches remain fragmented. There is currently no unified international framework for integrating GESI into Article 6.2 (A6.2) transactions – unlike the Article 6.4 (A6.4) mechanism, which has a required Sustainable Development Tool (SDT). In practice, each country or program applies its own safeguard standards, resulting in uneven requirements. Existing safeguard policies (e.g. from development banks or REDD+ programs) tend to emphasize “do no harm” compliance over proactive inclusion, and sustainable development outcomes (such as gender empowerment) are often rhetorically promoted but weakly measured or enforced in carbon markets. This patchwork of evolving standards makes it challenging to ensure that Article 6 activities consistently support gender equality and social inclusion. Overall, the policy foundation is in place – the Paris Agreement requires parties to respect human rights, gender equality, Indigenous rights, and other social safeguards – but clear operational guidance under A6.2 is lacking, leading to uncertainty and ad hoc approaches.

Existing safeguard policies (e.g. from development banks or REDD+ programs) tend to emphasize “do no harm” compliance over proactive inclusion, and sustainable development outcomes (such as gender empowerment) are often rhetorically promoted but weakly measured or enforced in carbon markets.



Seller country readiness and gaps: Stakeholder consultations and country case studies (e.g. Zambia, Rwanda, Papua New Guinea) revealed a gap between national policies and on-ground practice in host countries. Many seller countries do have gender equality policies or social inclusion strategies on paper, but these are seldom applied in carbon market projects or Article 6 authorization processes. Environmental and social safeguards are often implemented only to meet an external donor's or standard's requirements, in a compliance-driven manner focused on "do no harm" basics. As a result, activities may meet minimum safeguards, but they rarely aim for positive social outcomes such as community empowerment or gender transformation. Equitable benefits and inclusion are treated as optional add-ons – typically realized only if a buyer explicitly requires them or provides support. Host country stakeholders indicated that while they value social co-benefits in theory, they often lack the incentives, resources, and practical guidance to integrate GESI considerations proactively. Capacity constraints are widespread: project developers and authorities are familiar with technical mitigation processes but have limited expertise and tools for GESI integration. Even where GESI or sustainable development goals appear in national climate strategies, there is a disconnect when it comes to monitoring and enforcing those goals in Article 6 projects. In summary, many seller countries "know the why but not the how" – they acknowledge the importance of safeguards and inclusion but need support to translate these commitments into concrete action.

Buyer country perspectives: On the buyer side, interviews highlighted that buyer countries (and international carbon finance programs) have so far prioritized environmental integrity over social inclusion. Ensuring robust accounting, transparency, and basic safeguard compliance (to avoid reputational risk) are top priorities for buyers. By contrast, ambitious GESI outcomes – such as gender empowerment, equitable benefit-sharing, or community-led project design – are often seen as desirable but secondary. Few buyers have been willing to pay a premium for extra social outcomes, and most consider "do no harm" safeguards as sufficient for integrity. However, there are early signs of change. Some forward-looking buyer countries are

beginning to incorporate GESI into their climate finance policies and explore incentives for high-GESI projects. For example, the United Kingdom's climate finance strategy now includes guidance on gender and inclusion, New Zealand has showcased gender-responsive carbon projects, and Sweden has partnered with standards like the Gold Standard to evaluate sustainable development impacts. A few buyers even indicated willingness to offer price premiums or preferential terms for mitigation outcomes that demonstrably exceed minimum safeguard requirements. These examples remain the exception rather than the norm, but they signal a growing recognition that buyer countries can use their market influence to stimulate better social and gender performance in Article 6 activities. Overall, expectations between buyers and sellers are not yet fully aligned – buyers tend to expect compliance with basic safeguards, while sellers may not move beyond those minimum requirements without clear demand or support.

Across all stakeholder groups, the research identified a critical communication and perception gap. Social safeguards and GESI requirements under Article 6 are frequently treated as voluntary co-benefits rather than as core legal obligations.

Stakeholder perceptions and the communication gap: Across all stakeholder groups, the research identified a critical communication and perception gap. Social safeguards and GESI requirements under Article 6 are frequently treated as voluntary co-benefits rather than as core legal obligations. Notably, in interviews and surveys, almost no participants explicitly referenced the Paris Agreement's safeguard mandate (e.g. the preambular paragraph 11 on human rights, gender equality, Indigenous peoples' rights, etc.) when discussing Article 6 cooperation. This indicates that many practitioners and officials do not realize that respecting and promoting these safeguards is not optional but rather a binding part of the Agreement. The result is a misalignment of expectations: host countries

sometimes view GESI measures as extra steps only needed if donors require them, and buyer countries may frame GESI as “nice-to-have” add-ons instead of non-negotiable criteria. Clearer communication and aligned understanding are urgently needed. Both buyers and sellers must acknowledge that Paris-aligned safeguards (covering social, gender, and environmental protections) are mandatory prerequisites for Article 6 activities – a common baseline that should underpin all cooperation. Bridging this gap in understanding is essential to move from fragmented, ad hoc practices towards a more consistent, high-integrity and inclusive carbon market.

Overall, the findings portray a situation where readiness for GESI integration in Article 6 is still nascent. There is growing recognition of its importance and some existing policy commitments, but practical implementation is inconsistent and hindered by gaps in guidance, capacity,

and aligned expectations. Both sellers and buyers face challenges: host countries often lack the frameworks and support to implement GESI and safeguards, while buyers have not consistently signalled that these aspects are a firm requirement. The Paris Agreement’s safeguard principles provide a common foundation but translating them into action under A6.2 requires coordinated effort. The convergence of insights from literature, case studies, consultations, and the survey points to the same conclusion: to achieve “high-integrity, high-inclusion” carbon markets, parties must establish clearer standards and work together to build capacity and trust. In short, the rules and expectations need to be clarified and operationalized so that carbon market cooperation not only reduces emissions, but also actively advances gender equality, social inclusion, and the protection of vulnerable communities in line with the spirit and obligations of the Paris Agreement.



Recommendations – Toward inclusive and high-integrity Article 6 cooperation

The report offers a set of practical, action-oriented guiding recommendations for both buyer and seller countries to align their efforts with the Paris Agreement's safeguard obligations under A6.2. Policymakers in both host and buyer countries, as well as supporting institutions (like GGGI and other climate finance partners), are encouraged to consider the following actions:

1. Adopt a shared Paris-aligned safeguard framework:

Jointly establish a common baseline for GESI and safeguards in all Article 6 transactions. Buyer and seller countries may wish to apply the A6.4 SDT as a minimum benchmark for A6.2 cooperative approaches. The A6.4 SDT is a UNFCCC1-approved tool that operationalizes the Paris Agreement's safeguard principles – it includes robust “do no harm” criteria, requirements for inclusive stakeholder participation (including Free, Prior, and Informed Consent (FPIC) for IP and LCs), gender-responsive project design, and monitoring of Sustainable Development Goal co-benefits. Voluntarily extending this common framework to A6.2 bilateral agreements as a minimum requirement would ensure consistency and prevent the emergence of a two-tier system. In practice, both parties to a cooperation would agree that any ITMO2-generating project must meet these baseline social and environmental integrity standards. This creates a shared expectation from the outset that Paris-aligned safeguards will be upheld, providing greater clarity and confidence for all stakeholders.

2. Integrate safeguards into national authorization processes (seller countries): Host countries may consider harmonizing their Article 6 approval processes with the A6.4 SDT criteria. Several countries are already developing national carbon market safeguard guidelines – by aligning these with the internationally endorsed SDT framework, they can ensure completeness and credibility.

Additionally, for certain sectors like REDD+, seller countries could require recognized high-integrity standards (e.g. ART-TREES for REDD+ programs) to verify that safeguards (such as the UNFCCC Cancun REDD+ safeguards) are addressed and respected. Institutionalizing these standards nationally will close the gap between policy and practice, giving buyers assurance that any ITMO authorized by the host country meets rigorous social and environmental criteria.

3. Strengthen institutions, capacity building, and grievance handling systems (seller countries):

Successfully applying the A6.4 SDT in the context of A6.2 (bilateral cooperation) will require deliberate institutional strengthening and learning-by-doing. Unlike the centralized A6.4 mechanism, A6.2 involves bespoke agreements between countries – so host nations must build their own capacity to implement safeguards and GESI requirements. To facilitate effective implementation, host countries may engage in pilot activities and targeted capacity-building initiatives. This could include establishing multi-agency review committees or designating a competent national authority with a specific mandate to oversee GESI and safeguards for all Article 6 activities. For instance, the Article 6 approval body in the host country could formally include representatives from the environmental ministry, the gender/social inclusion ministry, and Indigenous peoples' affairs agency, who collectively evaluate proposed projects for compliance with the adopted safeguard criteria. Additionally, appointing a national GESI focal point or unit within the Article 6 governance structure can help operationalize these commitments. This unit could be responsible for reviewing each project's Gender & Inclusion Action Plan, verifying that it is adequate, and recommending improvements or corrective measures if gaps are identified.

- 4. Regular training and capacity building for** Designated National Authorities (DNAs), project developers, and other stakeholders are strongly encouraged, enabling them to become familiar with the safeguard criteria and risk screening procedures and reporting requirements. By strengthening local capacity, countries can more effectively integrate the SDT's processes (such as stakeholder consultations and monitoring of sustainable development indicators) within their existing governance systems. Host countries may also wish to integrate project-level safeguard data into national transparency frameworks – linking Article 6 project reporting with existing REDD+ Safeguard Information Systems and Sustainable Development Goals (SDGs) monitoring systems – so that evidence of social and environmental performance feeds into both national and UNFCCC reports.

An important consideration is the establishment of a national Article 6 Grievance Redress Mechanism (GRM), accessible to communities, workers, and other affected stakeholders. The national Article 6 GRM could build on existing institutional arrangements – such as environmental ombudsperson offices, REDD+ grievance systems – but should explicitly reference the Paris Agreement's safeguard obligations and apply to all Article 6 cooperative approaches and mechanism activities.

- 5. Include Paris safeguard provisions in bilateral agreements (buyer countries):** Buyer countries may wish to ensure that every cooperative approach they engage in under A6.2 is consistent with the Paris Agreement's safeguard obligations. This can be achieved by embedding explicit safeguard and GESI clauses in all bilateral agreements, purchase contracts, and partnership Memoranda of Understanding (MOUs) concluded with host countries. Such clauses should reference the Paris Agreement's relevant provisions – for example, the commitment to respect human rights, Indigenous Peoples' rights, gender equality, and other social principles – and stipulate that the cooperation will uphold these standards. In practice, a buyer's carbon purchase agreement could require the host country to apply its Paris-aligned safeguard framework (as per Recommendation 2). For sectors like REDD+, buyer countries could consider requiring the use of high-integrity programs such as ART-TREES (or an equivalent standard) that provide independent, third-party verification of the UNFCCC Cancun Safeguards. This approach ensures that emission reductions transferred under A6.2 meet both the Warsaw Framework for REDD+ and the broader Paris Agreement safeguard provisions. Buyer countries could also encourage, where appropriate, the use of high-integrity standards – such as CCP-approved or equivalent programs – to provide independent verification of safeguard and GESI performance, enhance transparency, and build mutual confidence in the quality of ITMOs.



6. Provide support and incentives to strengthen implementation and enhance ambition: Buyer countries can play an important role in supporting host (seller) countries to achieve and maintain effective implementation of the Paris-aligned safeguard and GESI requirements under A6.2. While these safeguards form part of the Paris Agreement's obligations, the shared priority is to ensure that they are operationalized consistently and effectively in practice. With commitment from buyers, further incentives could ensure higher ambition in alignment in national development priorities. This can be achieved through targeted technical assistance and capacity-building investments aimed at strengthening host-country institutions, systems, and human resources responsible for safeguard and GESI implementation. Areas of support could include: Assisting national agencies to establish or operationalize Article 6 approval and authorization systems that incorporate the A6.4 SDT; Providing training and peer learning for DNAs, local project developers, and verifiers on applying SDT criteria, inclusive stakeholder engagement, FPIC, and gender-responsive planning; and supporting the development or enhancement of national grievance redress mechanisms, safeguard monitoring systems, and information disclosure platforms. Buyer countries could also promote South-South

learning and regional collaboration by facilitating working groups or communities of practice to share experiences and best practices on implementing safeguards and GESI measures. In addition, buyers may wish to recognize and reward strong safeguard implementation and verification performance. Possible approaches include: offering preferential access to readiness or technical cooperation funding for countries demonstrating consistent alignment with Paris safeguard requirements; and prioritizing partnerships and transactions with countries that demonstrate credible, transparent safeguard enforcement and reporting.

These recommendations provide a practical roadmap for translating the Paris Agreement's safeguard commitments into action under A6.2. They are meant to be practical steps that countries can adapt to their context, emphasizing collaboration and mutual support rather than prescription. By establishing a common safeguard baseline, strengthening domestic systems, and embedding these commitments into cooperation agreements, countries will create the enabling conditions for carbon markets that deliver climate mitigation with integrity and inclusion. The foundation – in terms of legal obligations and broad policy commitments – already exists under the Paris Agreement; the task now is to implement it consistently and effectively.



Acronyms

A6.2	Article 6.2
A6.4	Article 6.4
A6.4 SDT	Article 6.4 Sustainable Development Tool
ADB	Asian Development Bank
AfDB	African Development Bank
ART-TREES	Architecture for REDD+ Transactions – The REDD+ Environmental Excellence Standard
BCB	Beyond Carbon Benefits
CCP	Core Carbon Principles
CDM	Clean Development Mechanism
CORSIA	Carbon Offsetting and Reduction Scheme for International Aviation
CTF	Carbon Transaction Facility
DESNZ	Department for Energy Security and Net Zero (UK)
DNA	Designated National Authority
FPIC	Free, Prior and Informed Consent
GCF	Green Climate Fund
GEDSI	Gender Equality, Disability and Social Inclusion
GESI	Gender Equality and Social Inclusion
GGGI	Global Green Growth Institute
ICF	International Climate Finance (UK)
ICVCM	Integrity Council for the Voluntary Carbon Market
ITMO	Internationally Transferrable Mitigation Outcomes
MOUs	Memorandums of Understanding
MRV	Measure, Report, Verify
NDC	Nationally Determined Contribution
PNG	Papua New Guinea
REDD+	Reducing emissions from deforestation and forest degradation in developing countries, and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks
SDGs	Sustainable Development Goals
SOI	Summary of Information
UN	United Nations
UNDP	United Nations Development Programme
UNEP	United National Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
VCMi	Voluntary Carbon Markets Integrity Initiative
WFR	Warsaw Framework for REDD+
IPs and LCs	Indigenous Peoples and Local Communities



1. Introduction

Article 6 of the Paris Agreement opens new avenues for international carbon-market cooperation, and ensuring these mechanisms are inclusive and equitable requires due consideration of Gender Equality and Social Inclusion (GESI). The Global Green Growth Institute (GGGI) works to make GESI a core element of its support to member and partner countries – through technical assistance, capacity building, and bankable investment projects (including carbon credit projects) that deliver gender and social inclusion co-benefits alongside mitigation. As countries engage in Article 6 transactions, there is a critical opportunity to ensure activities not only reduce emissions but also advance GESI on the ground.

This report is intended to guide a range of stakeholders about integration of GESI across Article 6 transactions—especially Article 6.2 (A6.2) cooperative approaches that allows countries to cooperate voluntarily to achieve their climate goals through the bilateral sales and purchase of Internationally Transferred Mitigation Outcomes (ITMOs). It helps host (seller) and buyer countries (or entities) understand relevant safeguard and GESI requirements and how to implement them in practice. Target audiences include policymakers, carbon-market practitioners, and partners involved in A6.2 transactions. The report offers options for designing high-integrity mitigation activities that uphold social and environmental standards and deliver inclusive benefits, drawing on perspectives from both buyers and sellers.

1.1 Context

The Paris Agreement commits Parties to minimize adverse economic, social and environmental impacts that may result from the implementation of measures taken to mitigate or adapt to climate change impacts (“response measures”).³ Similarly, Paragraph 7 of the Preamble of the Paris Agreement restates this, noting that measures to combat climate change, through so-called “response measures”, may have impacts on Parties and must be addressed when implementing the Agreement.⁴ To do this, the Paris Agreement adopted several principles and provisions on environmental and social safeguards in its preambular text. All Article 6 activities – whether cooperative approaches under A6.2 or projects under the A6.4 (A6.4) mechanism – are expected to comply with these safeguard principles and provisions, including any specific safeguards adopted (for example, the Warsaw Framework for REDD+⁵ safeguards in the context of REDD+ activities).

One way these principles are operationalized is through the A6.4 Sustainable Development Tool (A6.4 SDT), a mandatory requirement for all activities registering under the Paris Agreement’s 6.4 Crediting Mechanism (PACM). Agreed by Parties, it represents a global benchmark for environmental and social integrity and sustainable-development benefits. In contrast, no single framework governs how sustainable development and GESI are integrated into A6.2 bilateral deals; countries define their own policies and definitions, many still evolving or not specific to Article 6. Voluntary initiatives – such as the Integrity Council for the Voluntary Carbon Market (ICVCM) and the Voluntary Carbon Markets Integrity Initiative (VCMI) – offer guidance, but these are voluntary and not tailored to A6.2. This fragmentation makes it difficult to consistently assess whether Article 6 activities support gender equality and social inclusion.

In summary, **greater clarity and convergence are needed for both buyers and sellers in the Article 6 space.**

Seller countries would benefit from knowing the key social safeguard and GESI components that buyers are likely to expect for a mitigation outcome to be deemed “high integrity.” Conversely, buyer countries (and other international carbon market actors) need a practical understanding – and a realistic expectation – of what

implementing those components entails on the ground, including the support required to achieve them.

This report aims to shed light on these issues by examining current perspectives, readiness, and best practices. Thereby helping to move the needle toward more socially inclusive and gender-responsive carbon market transactions.

1.2 Report objectives, considerations and scope

The overall objective of this report is to:

Provide guidance on the integration of GESI across Article 6 transactions (especially A6.2), tailored for a variety of stakeholder groups, and including analysis of market readiness and interest across both buyer and seller countries.

This report concentrates on providing external guidance for integrating gender and social inclusion considerations in Article 6 transactions, drawing on comparative analysis and stakeholder insights from both the demand side (buyers) and supply side (sellers) of the carbon market.

The report is written primarily for policymakers and stakeholders in both buyer and seller countries, but it also provides useful recommendations for actors in the market that can support the integration of gender and social inclusion in Article 6 transactions.

In pursuing this objective, the report takes into account several key considerations and contextual factors:

- 1. Applicability of the A6.4 SDT beyond A6.4:** Although the A6.4 SDT imposes mandatory sustainable development and safeguards requirements only on A6.4 mechanism activities, it represents a *Party-approved benchmark* for high-integrity mitigation projects. The best-practice requirements and processes set out by this tool to meet the Paris Agreement’s safeguards and SDG goals could also be adopted (on a voluntary or

agreed basis) for A6.2 activities. Since countries may choose to pursue both A6.2 and A6.4 approaches, applying the A6.4 SDT’s guidelines to cooperative approaches could help ensure that all Article 6 activities meet consistent standards. However, a lack of understanding or capacity regarding the tool’s requirements – for identifying and managing social and environmental risks, and for assessing and enhancing contributions to the Sustainable Development Goals (SDGs) – may hinder countries’ ability to effectively implement this tool outside of the A6.4 context. The report thus considers how awareness and use of the A6.4 SDT can be promoted or adapted for A6.2 transactions.

- 2. Bilateral requirements under A6.2 transactions:** Under A6.2, it is ultimately up to the participating countries to negotiate and agree on the terms of their cooperation, which may include specific provisions on safeguards and sustainable development. A host (seller) country might need to meet the safeguard and SDG standards tied to the source of finance or the preferences of the buying country, as stipulated in their bilateral or multilateral agreement. This means that if a buyer country (or funding program) has environmental and social safeguard policies, the seller country’s mitigation activity must conform to those for the ITMOs to be accepted. It is important to note that guidance must be flexible to accommodate different bilateral arrangements, and that seller countries often must align with multiple sets of criteria depending on their partners in A6.2 deals.

3. Emerging Core Carbon Principles and market integrity standards: The ICVCM is assessing carbon crediting programs and credit categories against its Core Carbon Principles (CCPs) and Assessment Framework. Programs that are approved as CCP-Eligible may issue CCP-Approved credits (i.e. credits labelled as meeting high-integrity standards). It is conceivable that, under A6.2, some buyer countries or investors may set conditions requiring seller countries to use carbon crediting programs that are ICVCM CCP-Eligible as a way to ensure quality. This is relevant because the ICVCM Assessment Framework places strong emphasis on safeguards and sustainable development benefits. For instance, Criterion 7.1 (Assessment and management of environmental and social risks) requires that programs assess potential environmental and social risks, enforce mitigation measures proportionate to those risks, comply with national laws and international conventions (including the rights of Indigenous Peoples), provide for disclosure of safeguard information, and ensure grievances can be addressed. Additionally, Criteria 12.1 (Safeguards) and 12.2 (Sustainable Development Benefits) set baseline obligations that

all activities meet the aviation Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) program’s existing safeguard requirements and, where relevant, apply recognized third-party standards (such as the World Bank’s International Finance Corporation Performance Standards or established sustainable development certification schemes).

Together, these criteria effectively oblige programs – and by extension the projects under them – to avoid doing harm, uphold rights (including providing grievance mechanisms and benefit-sharing with Local Communities), and to deliver and transparently report positive contributions to the SDGs beyond just carbon mitigation. The ICVCM has also signaled that in future iterations of its standards, it will push for even tighter requirements, aiming for verifiable net-positive sustainable development impacts. All these developments in the voluntary market were taken into consideration, as they inform what “high quality” means and what practices might soon be expected or required, even in compliance markets or bilateral deals.



4. **REDD+ specific safeguards under A6.2:** Many countries are interested in generating ITMOs from REDD+ activities (Reducing Emissions from Deforestation and forest Degradation, plus related pro-forest actions). A6.2 can accommodate transfers of emission reductions from REDD+ as long as they are from 2021 onwards (to avoid double counting with the pre-2020 REDD+ efforts). However, countries engaging in such transfers will need to ensure conformance with the **Warsaw Framework for REDD+ (WFR)** safeguards. The WFR, agreed under the UNFCCC, includes a set of safeguards specifically for REDD+ activities – covering governance, stakeholder rights (including Indigenous Peoples and Local Communities or IP and LCs), biodiversity conservation, and other social and environmental issues. In effect, any REDD+ credits traded under A6.2 should uphold these pre-existing safeguards. This report considered the implications of REDD+ safeguard requirements, recognizing that they add another layer of social and environmental criteria that Article 6 activities (especially in the land-use sector) must meet.

1.2.1 Scope of the report

Based on the objectives and considerations outlined above, the scope of work for this report focuses on the following key aspects:



Examining the scope and applicability of the A6.4 SDT for A6.2 activities.

This involved analyzing the content of the A6.4 SDT (See Annex 5) and identifying which elements could be most relevant for cooperative approaches. The approval of the A6.4 SDT by the UN Parties provides an opportunity to raise the bar for social and environmental integrity and drive convergence between compliance, voluntary, and domestic carbon market standards. The report explored how the requirements and processes of this tool – for example, how to conduct safeguards risk assessment, how to consult stakeholders, and how to align mitigation projects with the SDGs – could be adopted or adapted by countries engaging in A6.2 transactions.

It also examined potential barriers: a lack of awareness or understanding of the A6.4 SDT's provisions might hamper countries' ability to apply it outside the A6.4 mechanism. Thus, the analysis looked at knowledge gaps and capacity needs that might need to be addressed for broader use of the tool.



Examining the views and perspectives of buyer countries with regards to GESI requirements in Article 6 transactions.

- Through a stakeholder consultation process (including semi-structured interviews and a perception survey), the report gathered insights from representatives of buyer countries (and institutions likely to purchase ITMOs) about their expectations and preferences on social and gender safeguards. A key question was to what extent these buyers expect host countries to demonstrate conformity with certain standards – for instance, whether buyers prefer or require the use of tools like the A6.4 SDT, adherence to ICVCM's CCPs via approved programs, or compliance with frameworks like the REDD+ safeguards where applicable.
- The consultations also probed whether buyer countries might be willing to **pay a premium** or give preferential treatment for mitigation outcomes that go **beyond minimum requirements** – particularly those that demonstrate strong, verifiable GESI outcomes. While the report did not involve an analysis of pricing or specific transaction terms, the stakeholders' perspectives help illustrate how enhanced social and gender outcomes could influence procurement decisions. For example, the interviews and survey explored whether buyers have internal policies or scoring criteria that favour projects with robust community outcomes, and how they define a “high-integrity” mitigation activity in practice.

These insights clarify how GESI factors may be valued and incentivized on the demand side of Article 6 markets.



Examining the views and perspectives of seller countries with regards to GESI requirements in Article 6 transactions.

- From the host country (seller) perspective, the report examined how governments and project proponents view the growing expectations for GESI integration. The stakeholder consultations included representatives from seller countries to understand whether they feel equipped to meet the higher social and gender standards that buyers or international frameworks are suggesting. This involved discussions on what would make such requirements feasible or attractive from their point of view, and under what conditions they would commit to going beyond the basics.
- The analysis gathered views on current challenges – for instance, whether these actors see the GESI-related requirements as achievable with their existing institutional capacity, whether they have access to the necessary technical or financial support to implement these as well as stringent safeguards and benefit-sharing measures, and how issues of fairness and risk-sharing come into play. Seller country stakeholders

shared concerns about balancing ambition with practicality, ensuring that responsibilities (and costs) for delivering co-benefits are shared appropriately, and the risk of being excluded from deals if they cannot immediately meet higher standards. While this report did not conduct a formal institutional capacity assessment, the perspectives collected offer valuable insights into the **enabling conditions** and **pain points** on the supply side. These insights can inform recommendations on how to support seller countries – through capacity building, finance, or policy guidance – so that GESI ambitions can be raised realistically and equitably.





2. Results

2.1 Summary results of the literature review

This section provides a summary of key thematic findings from the report’s literature review. The literature establishes an evidence base on how gender equality, social inclusion, and environmental and social safeguards have been framed and implemented in climate finance – especially carbon markets. It highlights promising practices, systemic gaps, and frames practical questions for stakeholder interviews, surveys, and case studies. In essence, the review sets the conceptual foundation for understanding what constitutes “high-integrity” mitigation outcomes from a GESI perspective, and how those expectations are (or are not) being operationalized by buyers, sellers, and standard-setting bodies.

2.1.1 Increasing recognition of GESI, but fragmented approaches

GESI is increasingly acknowledged in climate and carbon finance discourse yet is rarely treated as a unified or operational framework in carbon market governance. Most climate finance documents reference gender equality in some form (e.g. (United Nations Framework Convention on Climate Change (UNFCCC), 2019; African Development Bank, 2021; ADB, 2009) and some refer generally to social inclusion. Concepts like *gender mainstreaming* – assessing the implications of any action on women and men (ECOSOC definition) – are frequently mentioned. However, few documents explicitly use the term “GESI” or address gender and social inclusion in an integrated manner. Definitions and implementation approaches for gender/inclusion vary significantly. Some frameworks adopt a rights-based approach (e.g. UNFCCC, 2019) while others treat gender or inclusion as optional co-benefits or cross-cutting themes. For instance, the Green Climate Fund’s policies require gender action plans but do not address broader social inclusion, leaving gaps on intersecting vulnerabilities. Similarly, under the Kyoto Protocol’s Clean Development Mechanism, gender was largely optional and social inclusion was absent. This inconsistency in terminology, scope, and operational

detail has led to fragmented and uneven GESI integration across carbon standards and frameworks. In short, while gender equality is widely espoused as a value, it has not yet been institutionalized as a standard requirement across carbon market mechanisms.

In short, while gender equality is widely espoused as a value, it has not yet been institutionalized as a standard requirement across carbon market mechanisms.

2.1.2 Safeguards emphasize “do no harm” over inclusion

Environmental and social safeguards are more established than GESI in climate finance but remain compliance-driven. Major frameworks – e.g. the ADB’s Safeguard Policy Statement and various carbon market safeguard guides – treat safeguards primarily as risk mitigation tools to prevent harm (ADB, 2009). They focus on screening projects and procedural compliance (e.g. impact assessments, resettlement policies) rather than proactively promoting positive social outcomes. For example, the African Development Bank’s Carbon Markets Strategy (African Development Bank, 2024) emphasizes equity in narrative but provides few concrete enforcement mechanisms for safeguards. Some literature argues that gender should go beyond a minimal “do no harm” safeguard and be integrated as a core principle of climate action – e.g. by requiring GESI analysis, gender action plans, and monitoring strategies for projects. Best practices recommended include ensuring women’s equitable participation, leadership opportunities, and benefit-sharing through transparent consultation processes. In practice, however, truly transformative or empowerment-oriented safeguard approaches are rare. Even standards that reference human rights or Indigenous rights (such

as the REDD+ Cancun Safeguards or the A6.4 SDT) tend to emphasize procedural compliance over equity outcomes. Intersectional risks and the empowerment of marginalized groups are seldom addressed beyond basic consultation requirements. Thus, the current safeguard regimes in carbon markets largely ensure projects “do no harm,” but often stop short of actively “doing good” or advancing inclusion.

2.1.3 SDG co-benefits: Rhetorically promoted, weakly measured

Nearly all frameworks stress contributions to the SDGs, but measures of these co-benefits remain weak and optional in practice. Many high-level strategies (e.g. the (World Bank, 2021) call for aligning carbon projects with the SDGs. However, few standards define how to quantitatively track or verify such benefits. Even when tools exist – for example, the Gold Standard’s SDG Impact Tool – use of SDG indicators is often voluntary or left to the project developer’s discretion. Under the A6.4 mechanism, the Sustainable Development Tool provides a structured way to identify SDG impacts, but developers can choose which SDGs to report and there is no weighting to prioritize critical social goals like gender equality. Similarly, the ICVCM’s CCPs acknowledge SDG contributions but leave interpretation and verification to each program. In effect, “high-integrity” mitigation activities with strong co-benefits are championed in theory, but there is no consensus or mandated methodology on what this means. As a result, claims of SDG or GESI benefits are not consistently comparable or assured across different carbon market standards. This lack of standardization makes it challenging to evaluate the true ambition or impact of activities beyond emission reductions.

2.1.4 Fragmentation of safeguards frameworks and no clear A6.2 guidance

A key operational gap identified is the lack of harmonization between major safeguard and GESI frameworks relevant to carbon markets, which creates uncertainty for A6.2 implementation. The comparative landscape mapping (Annex 5.5) reveals significant divergences among the UNFCCC A6.4 SDT, the ICVCM’s CCPs, and the UNFCCC REDD+ (Warsaw Framework) safeguards. The A6.4 SDT includes explicit gender-sensitive risk screening and a broad set of social and environmental safeguards, whereas the ICVCM CCPs take a high-level principles approach with no specific gender safeguard requirements for carbon programs and associated standards. The Warsaw Framework for REDD+ mandates participation and grievance mechanisms for forest programs but does not require gender mainstreaming or address many social issues outside Indigenous and local community rights. A6.2 itself provides flexibility and has no predefined requirements for how to apply safeguards, GESI, or SDG provisions. In the absence of central guidance, the inclusion of social safeguards or GESI measures in bilateral agreements depends entirely on the negotiating parties. For example, Switzerland’s Nationally Determined Contributions (NDC) (Swiss Confederation, 2024) mentions sustainable development and human rights in the context of carbon trading, but does not concretely include any gender or social inclusion requirements for its cooperative approaches. This policy vacuum under A6.2 can lead to inconsistent expectations: one bilateral deal might rigorously apply the A6.4 SDT, while another might treat GESI as an afterthought. The fragmentation of frameworks – coupled with A6.2’s flexibility – poses a risk of uneven GESI integration and “safeguard shopping” (choosing the least stringent standard). It underscores the need for a *de facto* minimum benchmark to ensure all Article 6 activities uphold the Paris Agreement’s safeguards (as discussed in Section 3.2).

2.1.5 Institutional efforts and persistent gaps

Outside the carbon market standards themselves, multilateral development banks and agencies have developed GESI policies, but these are not yet translating into carbon market rules. Organizations like the Asian Development Bank (ADB), the UK's Foreign, Commonwealth & Development Office (FCDO), and GGGI have institutional gender strategies and safeguard policies that emphasize inclusion. These typically require gender considerations in project design and aim to build country capacity for inclusive climate action (e.g. ADB's policy includes gender as a cross-cutting theme). However, such approaches are not mainstreamed into carbon crediting standards. For example, ADB's safeguards don't mandate project-level gender analysis unless a risk trigger is hit, and the African Development Bank's (AfDB) carbon market strategy, while aspirational on gender, lacks clarity on implementation or monitoring. The literature suggests that development agencies should support countries' readiness to access carbon finance in a gender-responsive way, essentially bridging the gap between high-level policy and on-the-ground practice. Indeed, a major obstacle identified is the lack of performance-based incentives for GESI integration. Studies note that project developers seldom prioritize gender equality unless it is explicitly required by funders or buyers. There are generally no price premiums or preferential terms for carbon credits with superior GESI outcomes, so market actors perceive higher GESI ambition as an added cost without reward. This means GESI measures often remain voluntary "co-benefits" rather than core requirements, unless enforced by standards or contracts.

2.1.6 National policies vs. implementation on Article 6

Many developing countries have robust GESI and safeguard commitments in their national climate policies, but these are not consistently applied in carbon market transactions. For instance, countries like Cambodia, Costa Rica, Zambia, Paraguay, Papua New Guinea, and Rwanda explicitly reference gender equality and social inclusion in their NDCs or REDD+ strategies, demonstrating political will to link climate action with social inclusion. Rwanda's NDC, for example, prioritizes gender mainstreaming and even plans for gender-disaggregated data in MRV, and PNG's NDC commits to human-rights-based, gender-responsive approaches. In contrast, some developed country NDCs (e.g. Switzerland's) include only broad references to human rights and omit specific gender or inclusion commitments. Critically, however, even where strong national GESI frameworks exist, they are often not linked to the governance of carbon markets. Most host countries have not yet embedded their gender and safeguard policies into Article 6 implementation procedures. For example, Zambia, Nepal, and PNG each have well-articulated domestic GESI policies, but these remain disconnected from their carbon credit authorization processes, MRV systems, and Article 6 institutional arrangements. In practice, a project can be approved for Article 6 trading without undergoing the same gender and social assessments that the country's own policies would require for other development projects. This reveals a clear operational gap between policy and practice: national commitments to GESI are not automatically ensuring GESI outcomes in carbon market activities. The reasons include limited awareness, lack of technical capacity to enforce these standards in new carbon market units, and the absence (until now) of a unifying framework for Article 6.

In sum, the literature review finds that the Paris Agreement established a strong normative baseline on safeguards (including human rights, gender equality, and the rights of Indigenous Peoples), but operationalization of these principles in carbon markets is inconsistent and incomplete. Gender and inclusion are universally affirmed as important, yet too often treated as optional “co-benefits” rather than mandatory criteria. Multiple frameworks exist to guide safeguards and co-benefits (A6.4 SDT, voluntary standards, REDD+ safeguards),

but their differences – and the lack of A6.2 guidance – create confusion and uneven application. The gap is now less about agreeing on principles, and more about implementing them in practice. Ultimately, the literature underscores that Paris Agreement safeguards are legally binding obligations – not voluntary add-ons – and that clearer operational tools (like the A6.4 SDT) plus targeted capacity building are needed to bridge the disconnect between high-level commitments and on-the-ground Article 6 activities.

2.2 Landscape mapping results & implications for Article 6.2

The landscape mapping offers a structured, side-by-side assessment of how three key international frameworks integrate the Paris Agreement’s safeguard provisions – including general safeguards, GESI, and SDGs – in the context of carbon market activities. The frameworks examined are: (a) the A6.4 SDT; (b) the Integrity Council’s CCP and Assessment Framework; and (c) the UNFCCC Warsaw Framework for REDD+ (including the Cancun Safeguards).

2.2.1 Paris Agreement safeguards as a binding requirement

As a starting point, any cooperative approach under Article 6 must fully comply with the Paris Agreement’s environmental and social safeguard commitments. This is not optional, but a legal and procedural requirement. The Paris Agreement’s preamble (especially its 11th paragraph) lays out clear principles that Parties “should, when taking action to address climate change, respect,

promote and consider their respective obligations on” – among other things – human rights, the rights of IP and LCs and vulnerable groups, the right to development, gender equality and the empowerment of women, and related principles of public participation, just transition, and ecosystem integrity. These preambular safeguards apply to all climate actions, including market-based cooperation. In fact, Parties have agreed through CMA⁶ decisions that they must demonstrate in A6.2 initial reports how each cooperative approach “reflects” these Paris safeguards, and A6.4 activities are subject to “robust social and environmental safeguards” under the mechanism’s rules. In short, aligning Article 6 activities with these provisions is not a matter of choice but of faithfully implementing the Paris Agreement. These binding requirements are the benchmark against which we compare the three frameworks – to see how well each translates the Paris safeguards (and specific GESI and SDG requirements) into practice, and where there are gaps.



2.2.2 Key comparative findings

Despite shared high-level goals of ensuring no harm and promoting sustainable development, the frameworks diverge significantly in scope, specificity, and enforceability. Seven dimensions were compared: (1) Scope and Coverage; (2) Safeguard Content; (3) GESI Integration; (4) SDG Alignment; (5) Implementation and Enforcement; and (6) Overall Gaps and Alignment. Highlights are summarized below:

1. Scope and coverage

The A6.4 SDT is designed for UNFCCC-governed A6.4 mechanism activities, covering all sectors and applied at the project/program level. Although not required for A6.2 activities, it can readily be applied to them. The ICVCM CCPs set a quality bar for carbon-crediting programs such as Verra, Gold Standard, and ART in the voluntary market, and they can influence A6.2 deals by steering buyers toward CCP-approved programs to generate ITMOs.

The Warsaw Framework for REDD+ applies only to REDD+ in developing countries at national or subnational scale, embedding safeguards in policies and systems rather than individual projects; when REDD+ results are transferred under A6.2, the WFR (via the Cancun Safeguards and country reports) automatically applies to those forest-sector results. Jurisdictional REDD+ standards have emerged to operationalize the WFR at a jurisdictional scale – chiefly the ART-TREES (Architecture for REDD+ Transactions – The REDD+ Environmental Excellence Standard). ART-TREES focuses on large-scale (national or state-level) forest emissions reductions, translating the Cancun Safeguards into detailed criteria for credit issuance. It is currently sector-specific (forestry/land use) but is designed for both

voluntary and compliance markets (e.g. credits can be used under CORSIA and potentially A6.2 transfers). In practice, Guyana provides the leading example: in 2022 it became the first country to complete ART's process and was issued 33.47 million TREES credits for 2016–2020 – the world's first jurisdictional REDD+ credits, verified for both robust carbon accounting and rigorous social and environmental safeguards.

In practice, Guyana provides the leading example: in 2022 it became the first country to complete ART's process and was issued 33.47 million TREES credits for 2016–2020 – the world's first jurisdictional REDD+ credits, verified for both robust carbon accounting and rigorous social and environmental safeguards.

In sum, A6.4 SDT is comprehensive and can be universally applied; CCPs cover a broad voluntary space and indirectly A6.2; WFR is narrower (REDD+-specific).

2. Safeguard provisions

The A6.4 SDT lays out a comprehensive set of Environmental and Social Safeguards that operationalize the minimum requirements agreed by Parties to the Paris Agreement. It mandates a risk assessment and mitigation hierarchy (avoid, minimize, mitigate) for potential harms. It also defines specific safeguard elements with criteria – for example, human rights, labor, health and safety, gender equality, land rights, and Indigenous Peoples are all addressed explicitly. Meeting these criteria and monitoring relevant indicators is *mandatory* for any A6.4 activity.

The ICVCM CCPs take a principles-based approach: Principle 9 is dedicated to “Sustainable development benefits and safeguards,” requiring that any approved carbon-crediting program has clear tools and compliance procedures to ensure activities conform to widely accepted social and environmental safeguard standards and deliver positive sustainable development impacts. In effect, CCPs expect carbon programs to incorporate safeguard frameworks on par with those of leading standards or institutions (e.g. IFC Performance Standards, UN rights conventions). However, CCPs themselves do not enumerate specific safeguards; they rely on programs like VCS or Gold Standard to implement detailed rules.

The Cancun Safeguards under the WFR articulate seven broad principles rather than detailed standards. These include protecting Indigenous Peoples’ rights and knowledge, enabling full stakeholder participation, conserving natural forests and biodiversity (and “*enhancing... social and environmental benefits*”), and safeguarding against reversals and leakage. While comprehensive in coverage, they are high-level and allow countries flexibility in how to interpret and implement them. ART-TREES was specifically designed to “unpack the Cancun Safeguards into themes and indicators” for consistent application across jurisdictions. The TREES standard defines 16 thematic safeguard areas (covering all Cancun principles and related issues) each with structure, process, and outcome indicators that jurisdictions must meet. Notably, no TREES credits can be issued if the independent validator/verifier finds the jurisdiction out of conformance with safeguard requirements.

3. GESI integration

The A6.4 SDT explicitly includes gender equality as one of its safeguard elements and encourages gender-responsive stakeholder participation and benefit-sharing. However, it stops short of requiring dedicated gender

action plans or sex-disaggregated data – these are encouraged but not mandatory elements. The ICVCM CCP framework clearly references gender and inclusion as principles, expecting programs to consider these, but due to the lack of uniform assessment criteria, carbon programs may handle GESI in very inconsistent ways. One carbon program might require a gender assessment, another might just make a token statement – there’s no common yardstick or external validation for GESI under CCPs. The WFR (Cancun Safeguards) do not explicitly mention gender or women – their social focus is on IP and LCs, participation, and livelihoods. Additionally, Cancun safeguard A requires consistency with the objectives of relevant international conventions and agreements, which would encompass gender equality. ART-TREES, building on UNFCCC safeguards but filling gaps, integrates GESI principles. The TREES safeguard guidance explicitly states that jurisdictions “should respect, promote and consider principles of gender equality and the empowerment of women when implementing REDD+ actions”, in line with relevant international conventions.

4. SDG alignment

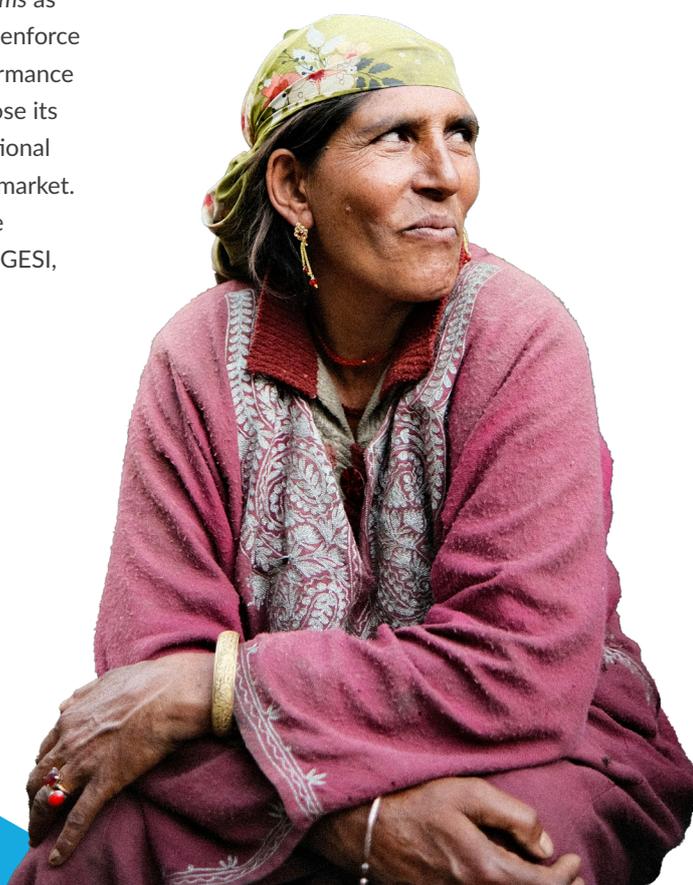
The A6.4 SDT requires that all A6.4 activities identify relevant SDGs, contribute to them, and monitor/report on those contributions. In essence, proving sustainable development benefits is part of the approval criteria for an A6.4 project. The ICVCM CCP framework also pushes for SDG alignment and even offers an optional “SDG Impact” label to encourage quantification of co-benefits by carbon programs. However, it does not mandate specific methodologies or indicators – carbon programs self-determine how to measure SDGs, so comparability and rigor are not guaranteed. A project could claim SDG benefits under one program that another program might not recognize, etc. The WFR predates the SDGs and never mentions them explicitly, but it does encourage generating social and environmental benefits (which implicitly relates to development goals). ART-TREES

consistently follows the WFR approach – jurisdictions must describe how their REDD+ program is respecting safeguards and generating benefits (e.g. protecting natural forests, improving local livelihoods), and this is checked qualitatively during verification. To take this a step further, ART has introduced the new “Beyond Carbon Benefits” (BCB) certification as a *voluntary add-on*. The BCB framework, yet to be adopted, is explicitly designed to “highlight the additional environmental and social-cultural benefits” of jurisdictional REDD+ programs in a consistent, verifiable way. Summarily, A6.4 SDT makes SDGs an integral, reportable part of each activity; CCP encourages but doesn’t standardize SDG reporting; WFR assumes co-benefits may happen and ART TREES sets out an approach to verify them.

5. Implementation and enforcement

The robustness of these frameworks also depends on how their requirements are implemented and enforced. Under A6.4, compliance with safeguards and SDG requirements is ensured through UNFCCC oversight and third-party validation. A project can only get registered and issue credits if an accredited auditor verifies it has met the SDT criteria (including addressing any safeguard risks), and the mechanism’s Supervisory Body can deny or suspend projects that fail to maintain standards. Under the ICVCM CCP model, enforcement is one step removed: the ICVCM certifies entire *programs* as CCP-eligible, and then trusts those programs to enforce safeguards in their projects. If a program’s performance slips (e.g. not upholding its own rules), it could lose its CCP status, but there’s no case-by-case international oversight of individual projects in the voluntary market. Essentially, enforcement is decentralized – some programs might rigorously audit safeguards and GESI, others less so.

For REDD+ (WFR), enforcement relies almost entirely on national systems and transparency. Countries are expected to have a Safeguard Information System and submit summaries showing how Cancun Safeguards are addressed. ART-TREES significantly ups the rigor by integrating enforcement into the crediting process. To issue TREES credits, a jurisdiction’s performance on both carbon and safeguards must be verified by an accredited third-party auditor and approved by the ART Board. Every verification under ART includes a detailed assessment of safeguard compliance (using the 16 themes and indicators), and verification reports are made public for transparency. If a jurisdiction fails to meet a required indicator (for example, if a grievance mechanism was not operational or Indigenous rights were violated), issuance is delayed or denied until the issue is resolved. BCB standard, once in force, will add another voluntary verification layer: jurisdictions opting in will need to undergo separate audits for their biodiversity and social benefit claims, reinforcing accountability on those fronts too. Overall, the trend is that voluntary standards and A6.4 mechanism incorporate independent oversight and enforcement mechanisms, whereas A6.2 cooperative approaches will depend on either these external standards or the strength of bilateral agreements.



6. Differences and gaps

Overall, the A6.4 SDT emerges as the most comprehensive and stringent framework among the three. It covers a wide spectrum of safeguard issues (from human rights and gender to anti-corruption and environmental integrity), applies at the project level with standardized procedures, and has UNFCCC oversight – making it a concrete way to operationalize the Paris Agreement’s safeguards. It is not perfect – e.g., formal grievance redress mechanisms under A6.4 are still being developed, but it sets a high bar that aligns with the Paris mandate. The CCP framework, in contrast, is aspirational rather than prescriptive: it articulates good principles but lacks uniform standards and relies on each carbon program’s interpretation. This opens potential loopholes – programs can claim to meet “widely accepted safeguards” without a clear yardstick, leading to variable depth and credibility of GESI integration. The WFR/ Cancun Safeguards are principle-based and outdated relative to Paris: they provide important principles (especially on Indigenous rights and participation) but omit gender. They have not been updated to reflect the Paris Agreement or SDGs, meaning they lag current international norms – yet they remain the de facto standard for REDD+ activities and are relied on by many donors. Jurisdictional REDD+ standards, like ART TREES and BCB could be used to align REDD+ programs with the Paris mandate, including on GESI.

The WFR/Cancun Safeguards are principle-based and outdated relative to Paris: they provide important principles (especially on Indigenous rights and participation) but omit gender.

2.2.3 Implications for A6.2 cooperation

This comparative analysis reveals critical gaps, risks, and opportunities for countries engaging in A6.2 trades – especially when they might cherry-pick elements from these frameworks. **The central finding is that the Paris Agreement’s safeguard provisions (including the human rights and gender equality obligations of preambular paragraph 11) are not optional – they form the binding requirements for all Article 6 activities.**

Therefore, any framework or standard used under A6.2 should be viewed not as a substitute for those obligations, but as a vehicle to implement them. **In practice, this means: if a country uses a voluntary standard or a bespoke approach for an A6.2 project, it still must ensure that all Paris-aligned safeguards are addressed.** Furthermore, a key trend is that voluntary standards and the A6.4 mechanism both incorporate independent oversight and enforcement mechanisms, whereas cooperative approaches under A6.2 have no such built-in guarantees. In the A6.2 context, integrity will thus depend on host countries’ Article 6 authorization and approval processes.

Against these requirements, the three frameworks offer different levels of assurance. **The A6.4 SDT provides the most complete and enforceable mechanism for translating Paris safeguards into practice.** It covers the broadest range of issues (including explicit gender considerations), requires demonstrable contributions to sustainable development, and has a built-in review process to verify compliance. Some elements are still evolving (e.g. grievance processes), but overall, the SDT represents the strongest existing tool to ensure Paris-aligned implementation.

The Warsaw Framework offers essential principles and is particularly strong on Indigenous rights, biodiversity, and participation within the REDD+ context. However, it was formulated pre-2015 and does not explicitly incorporate the newer social themes like gender equality from the Paris Agreement. Its effectiveness also heavily depends on national implementation and the use of a high integrity standard – meaning without a supplement like third-party verification (e.g. via ART-TREES), there’s no guarantee that what’s on paper is happening on the ground.

Voluntary market standards (under the CCP umbrella or others like Gold Standard, etc.) can add value by offering third-party verification. However, they vary in stringency, and none are designed specifically to be a comprehensive framework to validate and verify compliance with these international obligations. Their use in A6.2 should thus be conditional on alignment with the Paris safeguard requirements – i.e. a buyer or seller should ask: does this standard cover all the safeguards we are bound to uphold, and how will we demonstrate that? If not, additional measures are needed.

For REDD+ is important to highlight that the differences above have direct implications for countries engaging in REDD+ transfers under A6.2. Parties must not rely solely on the Warsaw Framework's self-reported safeguards if they aim to meet the Paris Agreement requirements. The Paris Agreement (preamble ¶11) makes respect for human rights, Indigenous rights and other safeguards *binding obligations* for any climate action. Under A6.2 guidance, each cooperative approach involved REDD+ is required to describe how it "reflects" these safeguards. Simply pointing to a national Cancun Safeguard summary would be inadequate – especially given WFR's gaps on gender and other safeguard elements.

Instead, Parties would be expected to ensure that high-integrity standards like ART-TREES (or comparable CCP-approved programs) are used as the vehicle to operationalize safeguards in A6.2 transactions. In practical terms, this means that if a country wants to trade REDD+ emission reductions bilaterally under A6.2, it will increase confidence and integrity to have those reductions validated under ART-TREES (with all Cancun Safeguards independently verified, FPIC ensured, etc.) and even certified for co-benefits under BCB.

2.2.4 Other high ambition frameworks

Other voluntary frameworks that promote higher ambition and strengthened gender outcomes also exist, such as the W+ Standard. This standard focuses on measuring and monetizing women's empowerment through a framework of outcomes and indicators. Third party verification is set up to quantify impact through marketable W+ units or W+ labeled units. While such frameworks can complement the **Article 6.4 Sustainable Development Tool (SD Tool)** by supporting outcomes that go beyond its minimum safeguard requirements, they are **not designed to demonstrate compliance with the Paris Agreement safeguards**. Applying these voluntary standards would also require market actors' commitment to the associated verification costs and to building additional capacity where needed. While this report did not assess such voluntary standards in detail, examples like the W+ Standard illustrate how market actors may pursue higher ambition beyond the minimum safeguard requirements of the Paris Agreement.



2.3 Results of the country case studies and consultations

This section synthesizes country-level insights on the integration of GESI and environmental/social safeguards into Article 6 carbon market mechanisms. It draws on consultations and policy reviews from Zambia, UK, New Zealand, Sweden, Norway, Cambodia, Paraguay, Costa Rica, Papua New Guinea (PNG), and Rwanda.

A few key themes across countries arise from the consultations:



GESI as core to integrity: Countries like the UK and New Zealand treat GESI not as optional but as essential for high-integrity carbon credits. The UK uses its International Climate Finance (ICF) guidance on Gender Equality, Disability, and Social Inclusion (GEDSI) to embed GESI in program design, while New Zealand mandates gender analysis and inclusive governance.



Safeguards frameworks: Most countries rely on international standards such as the A6.4 SDT, Gold Standard, and REDD+ safeguards. Sweden and Norway apply strict safeguards, including FPIC and anti-corruption measures, with Sweden piloting differentiated pricing to incentivize co-benefits.



Challenges in implementation: Countries like Zambia, Cambodia, and PNG face gaps between policy and practice. Issues include limited capacity, lack of standardized tools, and uneven awareness of safeguard requirements. GESI is often implemented to meet donor standards rather than national mandates.



Innovative practices: Costa Rica's Gender Action Plan under REDD+ and its "+Mujeres +Natura" initiative promote women's participation in forest conservation. Paraguay integrates gender theory into its NDC and emphasizes equitable benefit-sharing.



Monitoring and accountability: Sweden and the UK emphasize measurable indicators and annual reviews. Rwanda and PNG have developed national GESI policies but lack integration into carbon market frameworks.

Further analysis shows that some countries have similar approaches/strengths or struggle with similar challenges. For example:



UK and New Zealand: Leadership in GESI integration. The UK applies its ICF guidance across all programming, embedding GESI in log frames and requiring measurable co-benefits. It supports using the A6.4 SDT as a baseline for A6.2 transactions. New Zealand mandates gender analysis and inclusive design in all climate projects. It views safeguards as non-negotiable and GESI as a transformative element, not a cost burden.



Sweden and Norway: Rigorous safeguard protocols. Sweden uses its Sustainable Development strategy to guide Article 6 engagement, applying international standards and piloting differentiated pricing to support co-benefits. It collaborates with Gold Standard to refine SDG impact tools. Norway's NOGER Initiative enforces strict safeguards, including zero tolerance for human rights violations and corruption, and requires verified emission reductions before payment.



Zambia and Cambodia: Policy foundations with gaps in practice. Zambia has strong policy frameworks (e.g., Climate Change Gender Action Plan, National Gender Policy) but lacks standardized tools for GESI implementation. Project-level GESI measures are often donor-driven. Cambodia embeds GESI in its NDC and REDD+ programs but faces challenges in institutional integration, data collection, and capacity building.



Paraguay and Costa Rica: Gender-sensitive climate strategies. Paraguay integrates gender theory into its NDC and promotes inclusive land-use planning and benefit-sharing. It uses REDD+ safeguards and is exploring best practices for Article 6. Costa Rica developed a Gender Action Plan under REDD+, prioritizing women's participation and gender-sensitive indicators. Despite strong policy architecture, implementation tools remain underdeveloped.



PNG and Rwanda: Emerging frameworks.
 PNG has national GESI and REDD+ strategies, including FPIC and grievance mechanisms, but implementation is uneven. Its SIS is operational but lacks consistent subnational capacity. Rwanda has robust national GESI policies and budgeting frameworks, but these are not yet embedded in carbon market governance. Stakeholders call for clearer reporting and enforceable GESI criteria.



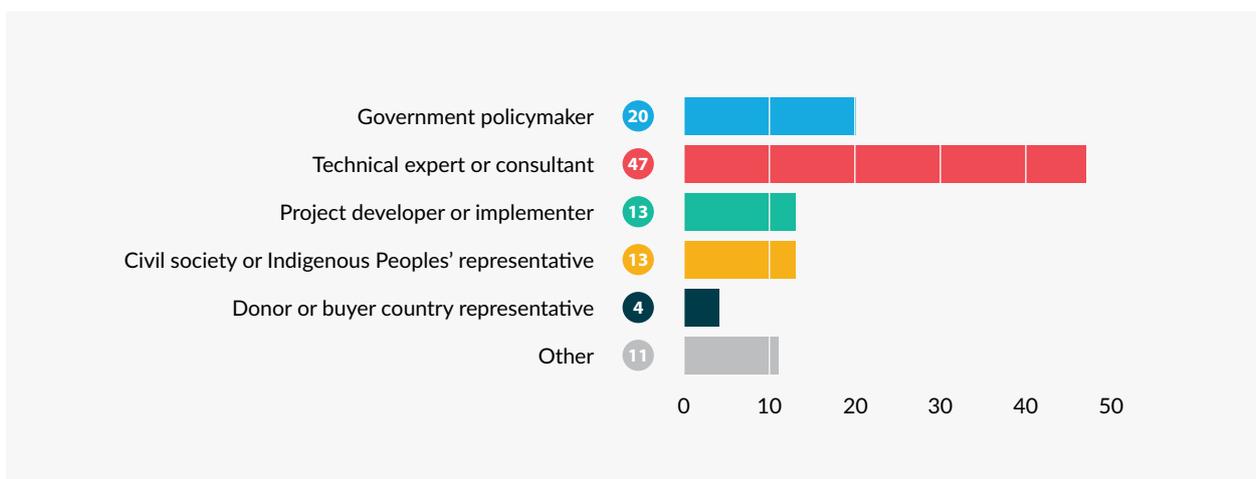
Cross-cutting challenges and opportunities.
 Common challenges include lack of standardized tools, limited capacity, and disconnects between policy and practice. Countries emphasize the need for clearer minimum safeguard requirements, cost-efficient GESI integration, and stronger monitoring systems. There is growing recognition that GESI and safeguards are essential for the credibility, equity, and sustainability of Article 6 transactions.

2.4 Results of the online survey

The survey collected 108 responses from stakeholders engaged in climate mitigation and carbon markets, with the largest share being technical experts and consultants (47), followed by government policymakers (20), project developers or implementers (13), and civil society or Indigenous Peoples’ representatives (13). Donor or buyer country representatives accounted for

four responses, and eleven respondents identified under “other” as showcased in Figure 1. Almost three-quarters of participants (79) reported direct involvement in Article 6 activities, including cooperation agreements, pilot projects, or policy design, which lends credibility to the findings.

Figure 1. Types of stakeholders represented in survey responses



Awareness of GESI was high, with 62 respondents describing themselves as very familiar, 40 somewhat familiar, and only 6 not familiar. Most also indicated that relevant policies exist: 73 confirmed the presence of safeguard policies and 75 reported GESI policies or action plans. However, implementation processes reveal

a gap. While 74 respondents confirmed mechanisms exist for safeguards (Figure 3), only 61 said the same for GESI (Figure 2), with 27 reporting none and 20 noting processes were still in development. This suggests that while safeguards are better institutionalized, GESI remains comparatively weaker in terms of operational pathways.

Figure 2. Distribution of stakeholder responses on the existence of GESI processes in carbon market projects

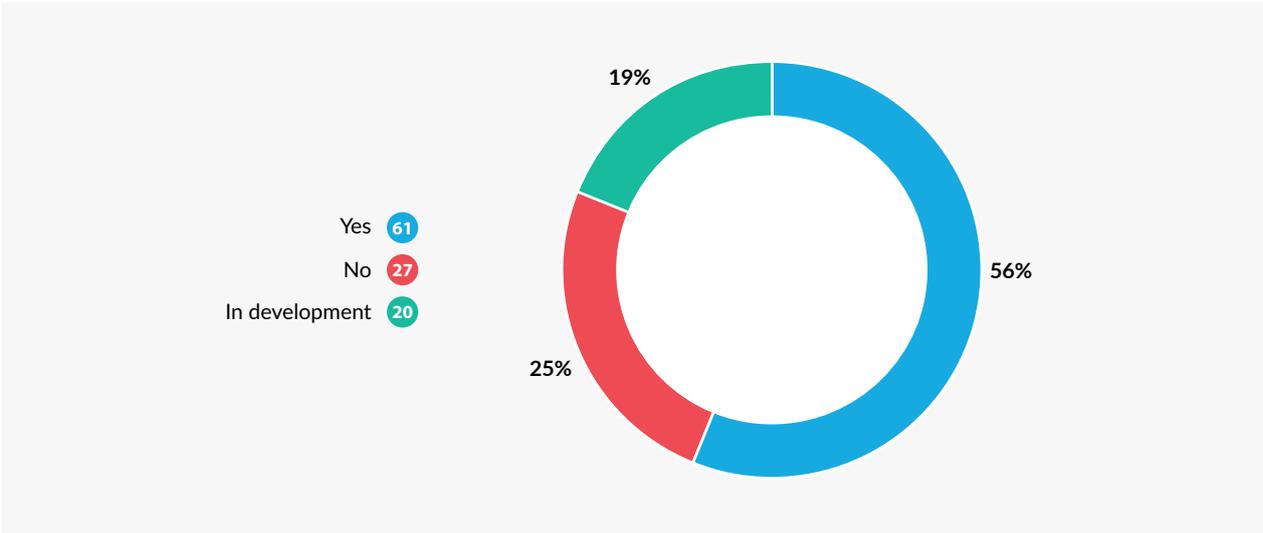
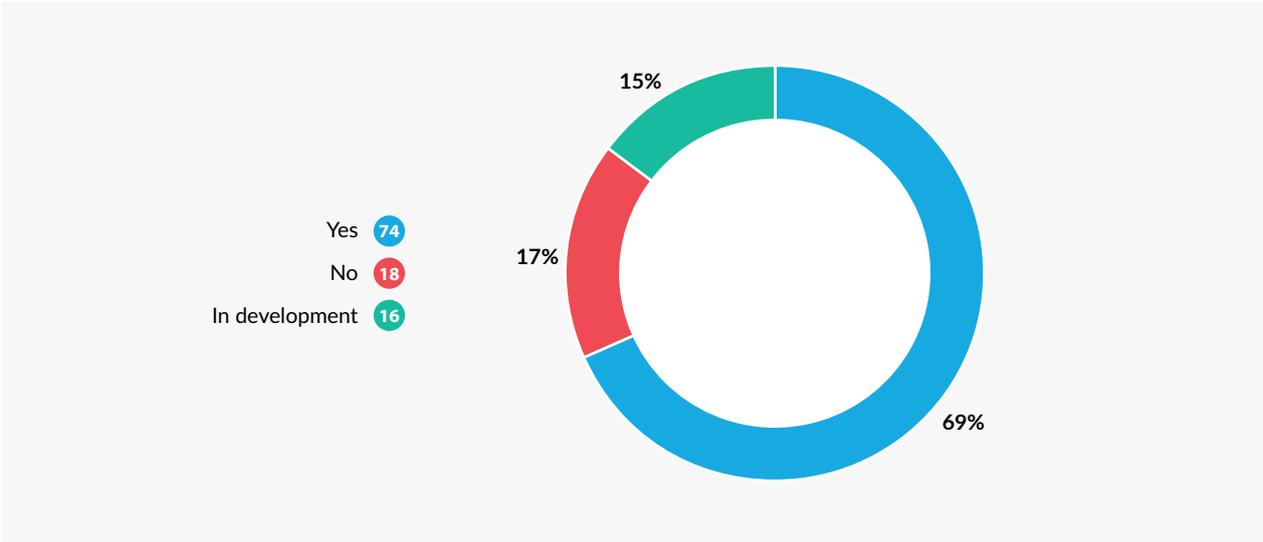


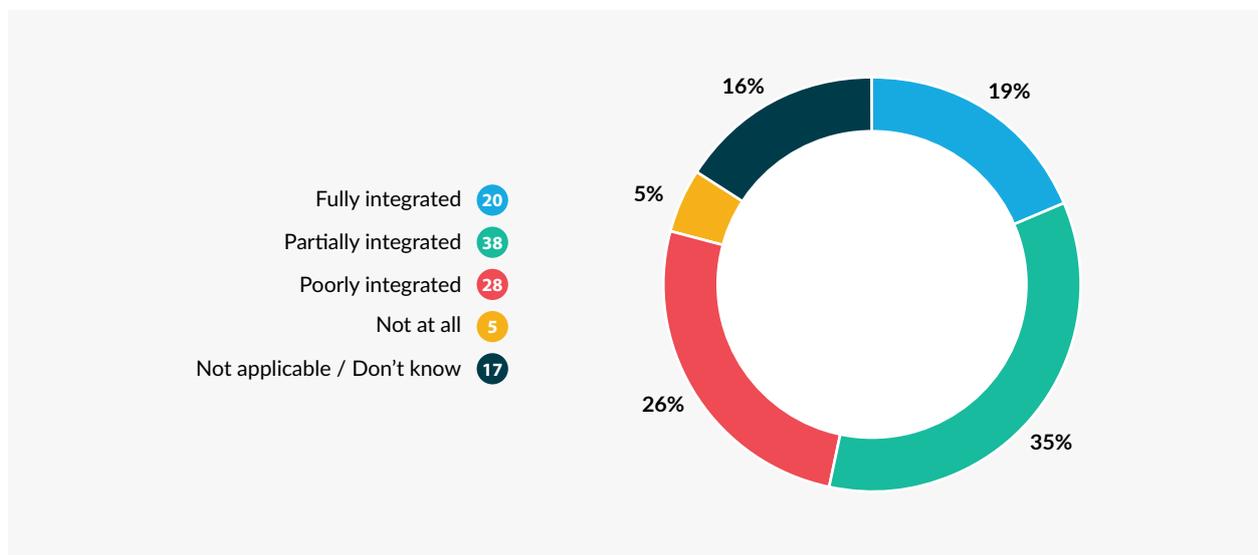
Figure 3. Distribution of stakeholder responses on the existence of safeguards in carbon market projects



When asked about integration into Article 6, only 20 respondents felt safeguards and GESI were fully integrated, while 38 described integrations as partial, 28 as poor, 17 as uncertain, and 5 as not at all (Figure 4). Tracking of co-benefits showed similar gaps: 55 respondents said co-benefits such as gender equality are tracked, 37 said this happens inconsistently, and 16 not at all. Use of voluntary standards was split,

with 50 respondents confirming reliance on standards such as Verra, Gold Standard, or CCB, while 58 did not. Differences emerged across groups: civil society and Indigenous Peoples' representatives were least likely to consider integration effective and emphasized weak participation and grievance systems, while project developers often noted co-benefits are not systematically tracked unless required by finance or standards.

Figure 4. Stakeholder perspectives on the integration of GESI and safeguards in Article 6 activities



Respondents identified clear barriers to mainstreaming safeguards and GESI (Figure 5). These include lack of guidance under A6.2, limited technical and institutional capacity, weak grievance mechanisms, inadequate engagement of women and Indigenous Peoples, and insufficient sex- or vulnerability-disaggregated data. Technical experts and consultants, who were the most familiar with GESI, stressed the absence of clear tools,

indicators, and monitoring frameworks. Civil society representatives focused on the lack of meaningful participation and rights-based approaches. Developers highlighted feasibility and costs, often describing GESI requirements as burdensome unless incentivized, while donor and buyer country representatives – though few in number – pointed to the importance of credible evidence for co-benefits.



Figure 5. Key words highlighted by respondents in relation to the barriers to mainstream safeguards and GESI into Article 6 activities

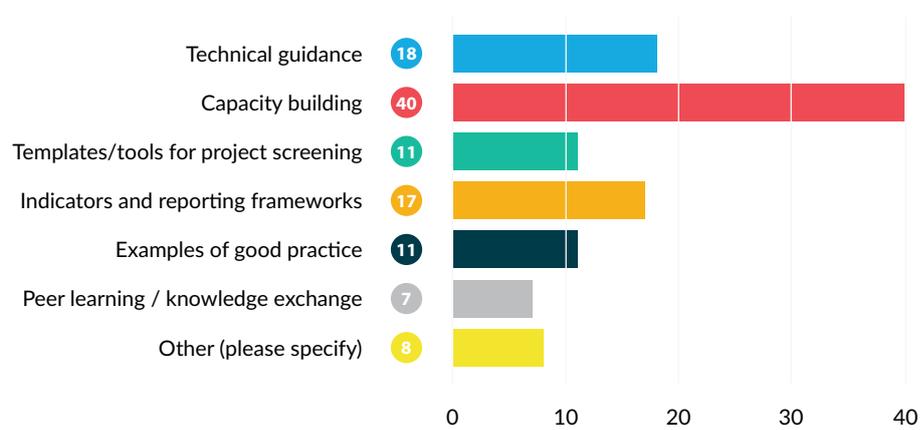


Support needs were strongly expressed. The most requested was capacity building (39 responses), followed by technical guidance (18), indicators and reporting frameworks (15), examples of good practice (11), and screening tools (10). There was also broad support for establishing a minimum safeguard and GESI standard under A6.2, with many respondents emphasizing that a baseline is necessary to protect vulnerable groups and preserve market credibility. Government respondents highlighted the risk of a “race to the bottom” without

common rules, while buyers indicated a willingness to consider price premiums or other incentives for projects that exceed minimum requirements. Taken together, the survey shows that stakeholders recognize the importance of safeguards and GESI, but that integration is still partial, support systems are underdeveloped, and different actor groups emphasize different parts of the challenge—underscoring the need for clearer standards, practical tools, and capacity support (Figure 6).



Figure 6. Stakeholder perspectives on support needed to strengthen safeguards and GESI integration





3. Key Findings & Recommendations

3.1 Key findings

3.1.1 Overarching finding – Paris Agreement safeguards are legally binding, not optional.

The Paris Agreement establishes that social and environmental safeguards are legally binding obligations for all climate actions, including those undertaken through carbon market cooperation. Paragraph 11 of the preamble calls on Parties to “*respect, promote and consider their respective obligations*” on human rights, the rights of Indigenous Peoples, gender equality, and other social principles when addressing climate change. These provisions are not aspirational statements—they form part of the treaty’s operative context under the Vienna Convention and have been operationalized through subsequent UNFCCC decisions.

The Paris Agreement establishes that social and environmental safeguards are legally binding obligations for all climate actions, including those undertaken through carbon market cooperation.

Parties engaging in **A6.2 cooperative approaches** must demonstrate in their initial reports how each cooperation “*reflects*” the Paris safeguards, while **A6.4 mechanism activities** are explicitly required to apply “*robust social and environmental safeguards*” under CMA-adopted rules. Aligning all Article 6 activities with these preambular safeguards is therefore not a matter of policy preference but a **legal duty**—a binding requirements that all participants must uphold.

Importantly, the **A6.4 SDT** serves as the UNFCCC-endorsed operational vehicle to deliver on these binding safeguard commitments.

3.1.2 Seller country perspectives

a. GESI policies not translated into practice

Many host (seller) countries have robust national gender equality and inclusion policies, but these are seldom applied in carbon market projects or Article 6 authorization processes. Case studies in Zambia, Rwanda, and Papua New Guinea, for example, revealed that while domestic GESI frameworks exist, they are not being integrated into the design or approval of mitigation activities. Often, social and gender safeguards get implemented only when an external donor or standard requires it – indicating a gap between national policy commitments and actual practice on the ground.

b. Safeguards treated in a compliance driven manner

Even where environmental and social safeguard systems exist (often influenced by donor or development bank standards), implementation tends to be in compliance-driven manner. Interviews with host country officials confirmed that safeguard measures are usually activated only to meet a funder’s conditions or a standard’s rules, rather than applied proactively as an internal mandate to improve equity or participation. In practice, processes focus on “do no harm” basics – avoiding negatives – instead of achieving positive social outcomes. This means basic compliance is met, but there is little emphasis on using safeguards to drive transformative outcomes for communities, as per Paris Agreement safeguards.

c. Social outcomes seen as optional without incentives

Seller stakeholders agree that a “**high-integrity**” carbon project should deliver **social outcomes** (equitable benefit-sharing, livelihood improvements, inclusive decision-making for women, Indigenous Peoples, and vulnerable groups) alongside emissions reductions. In reality, however, these outcomes are often treated as optional add-ons. They typically materialize only if a buyer or funder explicitly demands them or provides support, since financial or policy incentives to prioritize GESI and safeguard outcomes are largely absent on the seller side. Even though host country actors conceptually value social outcomes, they lack the mechanisms and resources to ensure those outcomes unless external support is offered.

d. Significant capacity and guidance gaps

Across the board, seller countries struggle with limited capacity and unclear guidance on implementing GESI and safeguards in Article 6 activities. Stakeholder consultations and survey responses underscored an urgent need for practical tools – standardized templates, clear indicators, and how-to guides – to integrate social inclusion into carbon projects. Project developers in these countries are often technically skilled in mitigation methodologies but have limited expertise in gender and community engagement, and they receive inconsistent instructions on these topics. Even where sustainable development or gender objectives are written into national strategies (e.g. NDCs or green growth plans), there is a disconnect when it comes to **monitoring and enforcing** those outcomes in carbon market projects. In sum, host countries often “know the why but not the how” – they recognize the importance of safeguards and inclusion (awareness is high) but lack the training, institutional support, and operational frameworks to mainstream these practices. This capacity gap means well-intended policies are not translating into action on the ground.

Case study: Integration of GESI in Zambia's carbon market

GGGI conducted consultations in Zambia with Article 6 practitioners to gather their experiences and insights on integrating GESI considerations into the country's carbon market.

Context:

Zambia is in the process of establishing institutional and legal frameworks to support participation in international carbon markets, including under Article 6 of the Paris Agreement. The 2025 Carbon Market Framework (CMF) outlines foundational elements for operationalization, such as the National Carbon Registry, host country approval processes, and validation requirements for mitigation activities. Among the key components is a set of six criteria for assessing proposed Article 6 activities. Criterion 2 - Sustainable Development – requires that mitigation activities demonstrate contributions to the SDGs and present expected qualitative and quantitative SD impacts using internationally recognized tools.

While these governance arrangements are in place, they remain in an early stage of implementation. No projects have yet been registered under Article 6, and several developers reported delays due to uncertainty while awaiting finalized regulations.

Case study: Integration of GESI in Zambia's carbon market *(continued)*

Findings:

Consensus that mitigation activities offer an opportunity for sustainable development impact: Stakeholders see “high-integrity” mitigation not only as verified emissions reductions, but as projects that deliver tangible and equitable community benefits, transparent benefit-sharing, and continuous safeguard processes.

Gap between policy and practice: While gender equality is formally recognized in Zambia's legal and policy frameworks, its operationalization in carbon market activities is inconsistent. Project-level measures, such as adapting consultation methods to increase women's participation, tracking benefit flows with disaggregated data, or ensuring women's representation in community forest groups were reported, but these were almost always introduced to meet donor or standard requirements rather than national guidance. Civil society actors emphasized that unless safeguard and GESI provisions are codified into clear regulations, supported by standardized templates and systematic monitoring, implementation will remain uneven and dependent on individual developers' commitments.

National GESI policy not reflected in Zambia's carbon market framework: Zambia has made policy advancements in support of GESI in climate action especially through the 2023 National Gender Policy, The National Policy on Climate Change, and The Climate Change Gender Action Plan. Despite this foundation, these GESI commitments are not consistently reflected in the carbon market framework. The CMF references SDG 5 under its sustainable development criteria but does not establish gender-specific safeguards or monitoring mechanisms.

Safeguards are compliance-driven, not voluntary: Stakeholders emphasized that safeguards are implemented when they are mandated—either through ZEMA's EIA requirements or through the safeguard frameworks of international standards such as VCS, CCB, Gold Standard, or World Bank safeguards. Developers described applying FPIC, grievance mechanisms, and sex-disaggregated monitoring primarily because they are required for certification or project approval, rather than as voluntary practices.

Uneven awareness of safeguard and GESI requirements: Developers and international partners demonstrated familiarity with detailed criteria, but other stakeholders referred to safeguards in broad terms, focusing on Zambia's laws and policies rather than on the A6.4 SDT or REDD+ safeguards. This uneven knowledge base limits independent oversight and leaves compliance largely defined by developers themselves. While inclusion is recognized in principle, the lack of standardized national tools or guidance results in wide variation in practice. Stakeholders consistently called for templates, capacity-building, and financing mechanisms to ensure GESI activities are adequately resourced. Without such measures, there is a risk that gender and inclusion remain aspirational rather than embedded. The CMF does not specify the standards or procedures to guide how these assessments should be conducted or how risks should be evaluated.

3.1.3 Buyer country perspectives

a. Emphasis on environmental integrity over social integrity

Buyer countries (those financing or purchasing ITMOs) have so far prioritized environmental integrity. Interviews with officials from countries like Norway and the UK indicate that top priorities include robust accounting (no double counting), transparency, anti-corruption measures, and respect for human rights as minimum conditions. Social safeguards – such as gender empowerment or community development – are generally viewed as desirable but secondary. Indeed, most buyer-side respondents acknowledged the value of GESI outcomes in principle, yet few were willing to pay a premium solely for those extra benefits. In practice, buyers expect safeguard compliance and “do no harm” to protect their investment’s reputation, but they do not typically reward social outcomes unless those align with other objectives.

b. Growing recognition of GESI, with early signs of incentives

There are emerging signals that some buyer countries are becoming more proactive about GESI. Several buyers have developed internal guidelines or policies to integrate gender equality and social inclusion into their climate finance and carbon market engagements. For example, the United Kingdom’s 2025 International Climate Finance strategy includes a GESI guidance note to steer its funding partners on inclusion best practices. Interviewees and case examples also suggest that a few buyers are **willing to experiment with incentives** for high-GESI performance: in the survey, some buyer representatives indicated willingness to consider price premiums or preferential terms for mitigation outcomes that demonstrably exceed the minimum safeguard requirements. For instance, New Zealand has showcased gender-responsive, inclusive projects as models of high-integrity carbon credits, and Sweden has collaborated

with standard-setters (e.g. partnering with the Gold Standard) to develop tools for evaluating sustainable development impacts. These early moves remain the exception rather than the norm, but they point to a strategic realization: buyer countries can use their market power not just to select good projects, but to **stimulate** better social and gender performance across the board.

3.1.4 Need for clear communication and aligned expectations

Current buyer–seller discourse often frames GESI measures as co-benefits, rather than as core **legal obligations** under the Paris Agreement. This framing issue emerged throughout the study: stakeholders frequently spoke of social and gender components in terms of added value or voluntary ambition, indicating a perception that these are optional features of Article 6 activities. Crucially, none of the interviewees or survey respondents explicitly referenced the Paris Agreement’s safeguard requirements – particularly the eleventh preambular paragraph that enshrines human rights, Indigenous rights, gender equality, and “do no harm” principles – when discussing expectations for Article 6 cooperation. **The absence of any mention of this binding Paris provision highlights a significant awareness gap: many participants do not recognize that adhering to these safeguards is not merely desirable but required.**

This gap underscores an urgent need for clearer communication and truly aligned expectations between buyers and sellers. Both sides must acknowledge that Paris-aligned safeguards are non-negotiable conditions for participating in Article 6, not optional extras. In essence, while there is broad agreement that incorporating GESI and safeguards improves outcomes, consistency and coordination are lacking because stakeholders haven’t been on the same page about their legal status. **Bridging this disconnect – is essential to make Article 6 implementation both inclusive and effective under a shared Paris mandate.**

In conclusion, the findings indicate that a **foundational misalignment on the legal status of safeguards undermines consistent implementation** of GESI and social protections in Article 6. While awareness of these issues is high, seller countries often voice commitment to social inclusion, and buyer countries champion “high-integrity” projects – many actors still treat GESI as secondary co-benefits rather than binding obligations. This has led to a fragmented, ad-hoc approach: sellers may lack the means or impetus to act without support, and buyers tend to focus on minimum integrity thresholds. Notably, all lines of inquiry (literature review, mapping, interviews, survey, case studies) converged on the need for clear standards, practical tools, and collaborative efforts to shift from

compliance-centric or voluntary practices toward a truly integrated “high-integrity, high-inclusion” carbon market under A6.2. Ensuring alignment on the Paris Agreement’s safeguard requirements is paramount – without a shared understanding that these safeguards are mandatory conditions (not optional add-ons), implementation will remain inconsistent. **These findings reinforce three core messages: Paris Agreement safeguards are legally binding obligations for Article 6 participants; the A6.4 SDT serves as the operational tool to meet those obligations; and the remaining shortcomings are primarily about capacity and framing – not policy.** In other words, the rules are in place, but stronger alignment and support are needed to fully realize them in practice.



3.2 Recommendations

To build a coherent and inclusive A6.2 framework, both buyer and seller countries (as well as supporting institutions) should take **coordinated action**. The recommendations below are intended to be practical and action-oriented, reflecting the study's insights and geared towards implementation by policymakers, project developers, and international partners. Where appropriate, concrete tools or mechanisms are suggested to operationalize the recommendations.

3.2.1 For both buyer & seller countries (shared responsibility and joint actions)

Recommendation 1 – Adopt the A6.4 SDT Framework for A6.2 Activities as a minimum requirement

Both seller and buyer countries may wish to agree that A6.2 cooperative approaches adhere to the A6.4 SDT as the minimum benchmark for social and environmental safeguards and for measuring sustainable development contributions. This UNFCCC-endorsed tool operationalizes the Paris Agreement's safeguard obligations and provides a consistent framework for “do no harm” screening, inclusive stakeholder participation (with FPIC for IPs where relevant), gender-responsive project design, and benefit-sharing. Applying the same robust tool across both A6.4 and A6.2 activities ensures consistency and prevents the emergence of a two-tier system of safeguards.

This UNFCCC-endorsed tool operationalizes the Paris Agreement's safeguard obligations and provides a consistent framework for “do no harm” screening, inclusive stakeholder participation (with FPIC for IPs where relevant), gender-responsive project design, and benefit-sharing.

For Jurisdictional REDD+ programs, countries may also wish to use a high integrity standard to guarantee that REDD+ credits are subject to robust safeguard

verification. ART-TREES, for example builds on the UNFCCC Cancun Safeguards and provides third-party verification of social and environmental integrity. Using ART-TREES (or an equivalent program and standard) aligns those activities to the same Paris-aligned requirements.

For other sectors, countries can enhance the credibility and market value of ITMOs by prioritizing activities certified by CCP-approved programs.

3.2.2 For seller countries

To bridge the implementation gap, seller (host) countries are recommended to internalize the Paris agreement safeguard requirements and bolster their enforcement mechanisms at home.

Recommendation 2 - Domesticating and harmonizing the Paris safeguard requirements within national Article 6 approval process

To bridge the implementation gap seller countries may wish to integrate the A6.4 SDT requirements directly into their national Article 6 approval and authorization procedures. In practice, this would mean that no A6.2 cooperation or A6.4 project would be authorized without undergoing comprehensive social and environmental screening consistent with the A6.4 SDT- including inclusive stakeholder consultations (and FPIC where IP and LCs are affected), a GESI assessment with corresponding action plans, and the monitoring of relevant Sustainable Development Goal indicators.

Many host countries are already developing safeguard policies for carbon markets. These can be aligned with the A6.4 SDT to ensure completeness and consistency with Paris requirements. Governments could use the SDT's existing templates, indicators, and guidance to develop or update their national Article 6 approval frameworks. By doing so, host countries can institutionalize a Paris-aligned “do no harm” process that ensures all authorized mitigation activities meet the same high-integrity safeguard requirements.

For Jurisdictional REDD+ programs, host countries may also wish to use high-integrity programs such as ART-TREES (or an equivalent program). This helps ensure that REDD+ transfers under A6.2 satisfy both the Warsaw Framework for REDD+ requirements and the Paris safeguard requirements. For other sectors and project types, countries can further enhance the credibility and market value of their ITMOs by prioritizing projects certified under CCP- approved programs.

By embedding the A6.4 SDT into domestic Article 6 regulations and approval systems, host countries can strengthen policy coherence, provide greater legal certainty for buyers and developers, and reinforce national accountability for socially equitable and environmentally sound carbon market participation.

Recommendation 3 - Strengthen institutions, capacity building and grievance systems

Applying the A6.4 SDT in the context of A6.2 cooperative approaches may require adaptation and learning-by-doing, given that A6.2 involves bilateral arrangements rather than a centralized UN process. To facilitate effective implementation, countries may wish to engage in pilot activities, institutional strengthening and capacity-building initiatives.

This could include establishing multi-agency review committees or designating a competent authority with a specific mandate for GESI and safeguards in Article 6. For instance, the host country's Article 6 approval body could include representatives from environmental authorities, gender and social inclusion ministries, and Indigenous Peoples' affairs, who collectively review the proposed activities for compliance with the adopted safeguard criteria. A national GESI focal point or unit could be tasked with reviewing each project's GESI Action Plan and recommending improvements or corrective actions.

Regular training and capacity building for DNAs, project developers, and other stakeholders is strongly encouraged, enabling them to become familiar with the safeguard criteria and risk screening procedures and reporting requirements. By strengthening local capacity, countries can more effectively integrate the SDT's processes (such as stakeholder consultations and monitoring of SD indicators) within their existing governance systems.

Host countries may also wish to integrate project-level safeguard data into national transparency frameworks – linking Article 6 project reporting with existing REDD+ Safeguard Information Systems and SDG monitoring systems – so that evidence of social and environmental performance feeds into both national and UNFCCC reports.

An important consideration establishment of a national Article 6 GRM, accessible to communities, workers, and other affected stakeholders. This mechanism could serve all Article 6 activities – both A6.2 cooperative approaches and A6.4 mechanism projects, and should:

-  Operate independently of project developers and buyers;
-  Provide safe, timely, and culturally appropriate channels for lodging complaints and seeking resolution;
-  Be linked to project-level grievance mechanisms required under the A6.4 SDT, so that issues unresolved at project level can escalate to the national system;
-  Publish periodic summaries of grievances received and actions taken; and
-  Use lessons learned to continuously improve national safeguard frameworks.

The national Article 6 GRM could build on existing institutional arrangements – such as environmental ombudsperson offices, REDD+ grievance systems – but should explicitly reference the Paris Agreement’s safeguard obligations and apply to all Article 6 cooperative approaches and mechanism activities. This would provide affected people with credible recourse if human rights, gender, or environmental commitments are breached, reinforcing both domestic accountability and international confidence.

To strengthen compliance over time, countries may wish to link the validity of Article 6 authorizations or credit issuance to safeguard performance. This might involve mid-term audits (e.g. every 3–5 years) of projects’ GESI outcomes and requiring remedial measures if standards are not being met. Publishing accessible summaries of each project’s safeguard and GESI performance for local stakeholders will further enhance transparency and trust.

By addressing these recommendations, host countries can demonstrate to buyers, civil society, and the international community that Paris-aligned safeguards are being implemented in practice – closing the gap between policy and practice.

3.2.3 For buyer countries

Buyer countries and climate finance providers can leverage their market influence and resources to support sellers in building their capacity and enhancing their domestic systems.

Recommendation 4 - Promote compliance with the Paris safeguard requirements

Buyer countries may wish to ensure that every cooperative approach they engage in under A6.2 is consistent with the Paris Agreement’s safeguard obligations. This can be achieved by embedding explicit safeguard and GESI clauses in all bilateral agreements,

purchase contracts, and partnership MOUs concluded with host countries.

These provisions could explicitly reference the Paris Agreement’s preambular commitments – including respect for human rights, the rights of Indigenous Peoples, gender equality, and intergenerational equity (preambular paragraph 11) – and require that all mitigation activities align with the Paris safeguard principles as implemented through the host country’s national Article 6 approval framework (see Recommendation 2).

For REDD+ transactions, buyer countries could consider requiring the use of high-integrity programs such as ART-TREES (or an equivalent standard) that provide independent, third-party verification of the UNFCCC Cancun Safeguards. This approach ensures that emission reductions transferred under A6.2 meet both the Warsaw Framework for REDD+ and the broader Paris Agreement safeguard provisions.

Buyer countries could also encourage, where appropriate, the use of high-integrity standards – such as CCP-approved or equivalent programs – to provide independent verification of safeguard and GESI performance, enhance transparency, and build mutual confidence in the quality of ITMOs.

Recommendation 5 – Provide support and incentives to strengthen implementation and enhance ambition

Buyer countries can play an important role in supporting host (seller) countries to achieve and maintain effective implementation of the Paris-aligned safeguard and GESI requirements under A6.2. While these safeguards form part of the Paris Agreement’s obligations, the shared priority is to ensure that they are operationalized consistently and effectively in practice. Enhanced ambitions could be explored where there is commitment from buyers to incentivize such outcomes.

This can be achieved through targeted technical assistance and capacity-building investments aimed at strengthening host-country institutions, systems, and human resources responsible for safeguard and GESI implementation. Areas of support could include:

-  Assisting national agencies to establish or operationalize Article 6 approval and authorization systems that incorporate the A 6.4 SDT;
-  Providing training and peer learning for DNAs, local project developers, and verifiers on applying SDT criteria, inclusive stakeholder engagement, FPIC, and gender-responsive planning; and
-  Supporting the development or enhancement of national GRMs, safeguard monitoring systems, and information disclosure platforms.

Buyer countries could also promote South-South learning and regional collaboration by facilitating working groups or communities of practice to share experiences and best practices on implementing safeguards and GESI measures.

In addition, buyers may wish to recognize and reward strong safeguard implementation and verification performance. Possible approaches include:

-  Offering preferential access to readiness or technical cooperation funding for countries demonstrating consistent alignment with Paris safeguard requirements; and
-  Prioritizing partnerships and transactions with countries that demonstrate credible, transparent safeguard enforcement and reporting.

Overall, these recommendations provide a practical roadmap for translating the Paris Agreement's safeguard commitments into action under A6.2. The foundation – comprising legally binding principles and well-established policy commitments – is already in place; the next step is to ensure that these principles are implemented consistently and effectively through concrete national and cooperative measures. By investing in capacity, institutional oversight, and incentive mechanisms, countries can help ensure that carbon markets deliver climate mitigation with integrity, inclusion, and credibility.

For Article 6 practitioners, championing these measures will help advance carbon market practices that uphold human rights, gender equality, and sustainable development as core elements of climate action – thereby aligning the operation of Article 6 carbon markets with both the letter and the spirit of the Paris Agreement.





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5. Annexes

5.1 Annex I Methodology

This study applied a mixed-methods approach comprising five interconnected components: (1) literature review, (2) landscape mapping, (3) semi-structured interviews, (4) online perception survey, and (5) country case studies. Together, these methods ensure triangulation of data sources and perspectives to produce credible, evidence-based findings on safeguards and Gender Equality and Social Inclusion (GESI) in Article 6 mechanisms.

1. Literature review

A comprehensive review of peer-reviewed and grey literature was conducted to examine how GESI, safeguards, and sustainable development co-benefits are integrated into carbon market mechanisms. Inclusion criteria required explicit reference to GESI, safeguards, or SDG contributions in carbon market or mitigation contexts. Findings were thematically grouped into six clusters covering global frameworks, safeguard compliance, co-benefits, governance, institutional approaches, and national policies.

2. Landscape mapping

A comparative assessment of three key frameworks, the Article 6.4 Sustainable Development Tool, the ICVCM Core Carbon Principles, and the REDD+ Warsaw Framework (for REDD+ activities) was undertaken. The mapping analyzed scope, safeguard provisions, GESI integration, SDG alignment, implementation mechanisms, and enforcement. The objective was to clarify how the safeguard, GESI, and SDG provisions of these frameworks compare, identifying areas of alignment, divergence, and potential harmonization.

3. Stakeholder consultations

Semi-structured interviews and an online survey engaged government representatives, carbon market participants, and experts from both buyer and seller countries. The consultations explored awareness, challenges, and good practices in implementing safeguards and GESI within Article 6 activities. Participants were selected for diversity in geography, institutional roles, and gender.

4. Country case studies

Case studies in Costa Rica, Cambodia, Paraguay, Rwanda, Papua New Guinea, and Zambia contextualized findings through national experiences. Each followed a standardized protocol encompassing document review, stakeholder mapping, and targeted interviews or focus groups. Cases were chosen for diversity in geography, Article 6 engagement, and GESI integration levels. Insights were synthesized through cross-case analysis to identify patterns and practical lessons.

5. Analytical approach

Data from all components were integrated through thematic analysis to identify recurring trends, gaps, and opportunities for improvement. Triangulation across literature, frameworks, and stakeholder perspectives strengthened the reliability and depth of conclusions, forming the empirical foundation for the study's recommendations.

Endnotes

- 1 United Nations Framework Convention on Climate Change
- 2 Internationally Transferred Mitigation Outcomes
- 3 UNFCCC, 1992, entered into force on 21 March 1994. Article 4, paragraph 8.
- 4 Paris Agreement, 2015, entered into force on November 4, 2016. UNFCCC Decision 9/CP, Article 4.15, and UNFCCC, 1992, art 4.8 and 4.10.
- 5 See Article 5 of the Paris Agreement – Reducing Emissions from Deforestation, Forest Degradation, and the role of conservation, sustainable management of forests and enhancement of forest carbon stocks in developing countries
- 6 CMA refers to the Conference of the Parties serving as the Meeting of the Parties to the Paris Agreement – the governing body that adopts decisions to implement the Paris Agreement



