



Republic of Zimbabwe
Ministry of Environment, Climate and Wildlife

Zimbabwe Carbon Markets Policy Framework

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Table of Contents

ACKNOWLEDGEMENTS	III
FOREWORD	IV
EXECUTIVE SUMMARY	V
ABBREVIATIONS AND DEFINITIONS.....	VI
1. INTRODUCTION	1
2. POLICY CONTEXT	1
2.1. INTERNATIONAL POLICY CONTEXT	1
2.2. NATIONAL POLICY CONTEXT	1
3. OBJECTIVES OF THE CARBON MARKET FRAMEWORK	2
4. GUIDING PRINCIPLES.....	2
5. ELIGIBILITY REQUIREMENTS	3
5.1. ELIGIBLE PROJECTS AND MITIGATION ACTIVITY TYPES.....	3
5.2. PROJECT DEVELOPER ELIGIBILITY REQUIREMENTS	4
5.3. ELIGIBILITY FOR ACQUIRING PARTIES	5
5.4. ELIGIBLE MITIGATION OUTCOME (MO) USES.....	5
5.5. ELIGIBLE METHODOLOGIES	6
5.6. ELIGIBILITY REQUIREMENTS FOR INDEPENDENT AUDITORS AND VERIFIERS.....	6
6. ZIMBABWE’S APPROACH TO THE CARBON MARKET.....	6
6.1. COOPERATIVE APPROACHES (ARTICLE 6.2)	7
6.2. PARIS AGREEMENT CREDITING MECHANISM (ARTICLE 6.4).....	7
6.3. REDUCING EMISSIONS FROM DEFORESTATION AND FOREST DEGRADATION (ARTICLE 5).....	7
6.4. VOLUNTARY CARBON MARKET PARTICIPATION	8
7. AUTHORIZATION REQUIREMENTS	8
7.1. AUTHORIZATION OF COOPERATIVE APPROACHES	8
7.2. AUTHORISATION OF ENTITIES AND PROJECTS	9
7.3. AUTHORISATION OF MITIGATION OUTCOMES (MOS)	9
8. CORRESPONDING ADJUSTMENT	10
9. ENVIRONMENTAL INTEGRITY REQUIREMENTS.....	10
10. ENVIRONMENTAL SAFEGUARDS	11
11. SUSTAINABLE DEVELOPMENT.....	12
12. SOCIAL SAFEGUARDS	12
12.1. STAKEHOLDER AND PUBLIC PARTICIPATION	12
12.2. FREE, PRIOR, AND INFORMED CONSENT	13
12.3. NATIONAL GRIEVANCE AND REDRESS MECHANISM.....	13
13. MEASUREMENT, REPORTING AND VERIFICATION	13
14. INSTITUTIONAL ARRANGEMENTS.....	14
14.1. DESIGNATED NATIONAL AUTHORITY	14
14.2. ZIMBABWE CARBON REGISTRY	14
15. BENEFIT SHARING.....	15
15.1. NATIONAL LEVEL BENEFIT SHARING.....	15
15.2. PROJECT LEVEL BENEFIT SHARING	15

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Foreword

As the World faces the profound challenges of climate change and environmental degradation, the need for innovative solutions has never been more urgent. In Zimbabwe, we recognize that carbon trading presents a pivotal opportunity to achieve our national climate goals while fostering sustainable development. The Zimbabwe Carbon Market Framework serves as a testament to our commitment to tap into the opportunities and incentives presented by the global call to reduce greenhouse gas emissions and promotion of low emission development.

This framework embodies our vision for a sustainable future where economic growth and environmental stewardship go hand in hand. By establishing a robust carbon trading system and market approach; we aim to incentivize businesses, industries and communities to adopt low-carbon technologies, improve energy efficiency and food security, and invest in projects that restore and conserve our natural resources. High environmental integrity and contribution to sustainable development should be at the core of our carbon market activities.

Our Framework aligns with our international obligations under the Paris Agreement, guiding us toward a path of climate action that is both equitable and inclusive. It is designed to engage various stakeholders, including government agencies, the private sector, civil society and local communities, ensuring that the benefits of carbon trading are shared widely across society.

We believe that through effective implementation of this framework, Zimbabwe can harness the potential of market-based mechanisms to drive significant greenhouse gas emission reductions and removals while creating new opportunities for economic growth and job creation in emerging green sectors. We are committed to building a transparent, accountable and efficient carbon trading system that fosters innovation and investment.

As we move forward, we invite all stakeholders to collaborate with us in this endeavor. Together, we can create a low-carbon and climate resilient economy that safeguards our environment for future generations and contributes to the global fight against climate change.

Let us embrace this opportunity with determination and courage, ensuring that no one and no place is left behind.

Amb. T. T. Chifamba
Secretary for Environment, Climate and Wildlife
Government of Zimbabwe

Executive summary

Zimbabwe recognises climate action as central to its economic and human development. Environmental and social integrity of our actions is of paramount importance in building trust and confidence in the implementation of our international commitments. The Ministry of Environment, Climate and Wildlife is the main government entity that co-ordinates policy on environment and climate. This national framework provides for the formal introduction of Zimbabwe's approach to carbon trading and its recognition as a means towards meeting climate change policy objectives and mobilization of resources for sustainable development.

The goal of this framework is to promote, institutionalise and provide guidance for carbon market activities in Zimbabwe. The Government of Zimbabwe allows and promote trade in carbon credits on the local and international markets to assist the country in meeting its climate goals and generate climate finance.

The Framework is comprised of 15 sections as follows:

- Section 1 provides an introduction to the framework;
- Section 2 outlines the international and nation policy context;
- Section 3 presents the objectives of this framework;
- Section 4 outlines the guiding principles;
- Section 5 highlights the eligibility requirements for participating in the carbon market, project developer requirements, methodologies and auditors and verifiers;
- Section 6 details mechanisms considered for carbon trading in Zimbabwe;
- Section 7 outlines requirements for authorisation of cooperative approaches, entities and mitigation outcomes;
- Section 8 highlights Zimbabwe's approach to the application of corresponding adjustments;
- Section 9 outlines the environmental integrity guidelines;
- Section 10 provides for the guidance on environmental safeguards;
- Section 11 presents guidance on ensuring sustainable development co-benefits in carbon projects;
- Section 12 provides guidance on social safeguards;
- Section 13 highlights the main elements of measurement, reporting and verification;
- Section 14 outlines the institutional arrangements for carbon market activity regulation in Zimbabwe; and
- Section 15 highlights the policy position on national and project level benefit sharing arrangements.

The implementation of this framework is supported by regulations and standard operating procedures which are updated from time to time in line with policy and market trends.

Abbreviations and definitions

A6.4ER	Article 6.4 Emission Reduction
CMA	Conference of Parties serving as the Meeting of the Parties to the Paris Agreement
CO ₂ e	Carbon dioxide equivalent
AFOLU	Agriculture, Forestry and Other Land Use
DOE	Designated Operational Entity
FPIC	Free Prior and Informed Consent
GHGs	Greenhouse Gases
ITMOs	Internationally Transferred Mitigation Outcomes
LEDS	Long Term Low Greenhouse Gas Emission Development Strategy
LOA	Letter of Authorisation
MO	Mitigation Outcome
MOU	Memorandum of Understanding
MRV	Measurement, Reporting and Verification
NBA	National Buffer Account
NDC	Nationally Determined Contribution
NGRM	National Grievance and Redress Mechanism
NTA	National Transaction Account
REDD+	Reducing Emissions from Deforestation and Forest Degradation
SDGs	Sustainable Development Goals
UNFCCC	United Nations Framework Convention on Climate Change
VCM	Voluntary Carbon Market
ZCR	Zimbabwe Carbon Registry
ZiCMA	Zimbabwe Carbon Markets Authority

1. Introduction

Climate change presents one of the greatest challenges faced with mankind in recent times. The physical impacts of climate change have resulted in significant losses in various socio-economic sectors and the need to upscale climate action is now more urgent than ever before. Although Zimbabwe is a small emitter of greenhouse gases (GHGs), the country is committed to mitigating climate change and adapting to its effects within the context of the United Nations Framework Convention on Climate Change (UNFCCC), the Paris Agreement and any future instruments agreed to by the Conference of Parties (COP). Carbon trading plays a central role in delivering broad-based and cost-efficient reduction in GHG emissions and assists in achievement of Sustainable Development Goals (SDGs).

2. Policy context

2.1. International policy context

The Paris Agreement promotes international market mechanisms to unlock green investments for the collaborative achievement of the Nationally Determined Contributions (NDCs) under Article 6, specifically Articles 6.2 and 6.4. The goal of the market mechanisms is to increase private sector participation and to contribute to the global mitigation goals, which aim to limit global temperature rise to well below 2 degrees Celsius as compared to pre-industrial levels. In addition, Zimbabwe recognises the important role forests in climate change mitigation as enshrined in Article 5 of the Paris Agreement and the associated REDD+ implementation frameworks. As stated in the Paris Agreement, all carbon trading activities are to be done in the context of advancing sustainable development and poverty reduction.

The Republic of Zimbabwe ratified the UNFCCC in 1994 and the Paris Agreement in 2017 and is therefore party to the both the Convention and the Agreement. As a Party to the Paris Agreement, Zimbabwe engages in cooperative approaches under Article 6 on a voluntary basis in the pursuit of enhanced climate change mitigation and associated sustainable development co-benefits.

2.2. National policy context

According to Zimbabwe's First Biennial Transparency Report and Fifth National Communication to the UNFCCC (2024), the country's net GHG emissions are dominated by the Agriculture, Forestry and Other Land Use (AFOLU) and Energy sectors respectively, followed by Industrial Processes and Product Use (IPPU), and Waste. Zimbabwe's Long-term Low Emission Development Strategy notes that there will be an increase in greenhouse gas emissions across all sectors through 2050 but can be lowered if low carbon investments are upscaled. However, the achievement of the country's mitigation targets is faced with a number of challenges, mainly climate finance and limited access to abatement technologies.

Zimbabwe has prepared, communicated, and is duly maintaining its NDCs since 2015. In its 2021 Revised NDC and its 2025 NDC 3.0 Country Statement, Zimbabwe recognises the important role of carbon markets in the implementation of its NDC mitigation and adaptation actions. The National Climate Change Adaptation Plan in its resource mobilisation strategy indicates the need to enhance climate change resilience through carbon projects co-benefits.

3. Objectives of the Carbon Market Framework

The aim of this framework is to enhance Zimbabwe's quest to reduce GHG emissions, mobilise climate finance, advance sustainable development and increase technology development and transfer through the generation of high integrity mitigation outcomes and participation in the compliance and voluntary carbon markets.

The objectives of this framework are to:

- facilitate Zimbabwe's engagement in carbon trading on the international carbon market.
- ensure integrity, accountability and transparency of carbon market activities in Zimbabwe.
- define the roles and responsibilities of stakeholders involved in carbon market activities.
- provide guidance on benefit sharing of proceeds emanating from carbon market participation.
- provide for enhanced climate change mitigation with adaptation co-benefits in line with the national development priorities, National Climate Policy, Long-term Low Emission Development Strategy (LT-LEDS), Nationally Determined Contributions and National Climate Change Adaptation Plan.

4. Guiding principles

Zimbabwe's carbon market participation is guided by the following principles:

- Environmental Integrity:** Projects and associated emission reductions and removals must be real, additional and durable. Projects must go beyond business-as-usual, grounded in robust science and conservative accounting; incorporating safeguards against double counting, leakage and non-permanence whilst recognising situations of suppressed demand.
- Sustainable development:** Projects should contribute to, *inter alia*, increased decent employment, business and human capital development opportunities, climate proofed livelihoods, development of local infrastructure, improved access to and the quality of education, healthcare and sanitation, environmental restoration, food security, gender equality, access to sustainable clean water and access to clean and affordable energy.
- Transparency and accountability:** Institutions and projects should ensure transparency and accountability for building trust among stakeholders and all processes from project selection to revenue distribution should be open to public scrutiny.

Measurement, reporting and verification (MRV) systems, participatory oversight bodies and accessible grievance mechanisms are critical for ensuring accountability and transparency.

- iv. **Equity and Inclusive Participation:** Carbon projects must prioritize fair and transparent benefit-sharing, ensuring that revenues reach local communities and vulnerable groups. Women, youths and other vulnerable groups should have a voice in project design, decision-making and implementation. Participation in the carbon market should not place undue burden on the people and Government of Zimbabwe.
- v. **Social integrity:** Institutions and projects should ensure social safeguards that are necessary to protect human rights, land tenure and the preservation of cultural heritage. Projects should not result in forced displacement, disenfranchisement or lead to forced resettlement.
- vi. **Devolution:** This framework should ensure that adequate public and stakeholder consultations for projects are carried out in line with the principle of devolution in which the lower administrative structures approve and benefit from projects undertaken within their jurisdiction.

5. Eligibility requirements

5.1. Eligible projects and mitigation activity types

The Government of Zimbabwe may authorize and register projects or activities in all sectors inside or outside the scope of Zimbabwe's latest NDC. All approved and registered projects shall be eligible for the creation of authorised and internationally transferable Mitigation Outcomes (MOs) to the extent provided for by the Government. All projects and activity types compliant with the following requirements are eligible:

- i. The project or activity must comply with the provisions of this framework document and all relevant Zimbabwean laws and regulations applicable to the relevant activity or sector.
- ii. The project or activity must be implemented and verified in accordance with an approved methodology.
- iii. The project or activity must be implemented by an eligible developer.
- iv. The project or activity and area must be classified as eligible.
- v. The project or activity must make a meaningful contribution to sustainable development.
- vi. The project must demonstrate environmental integrity.
- vii. The project or activity must comply with the environmental and social safeguarding requirements.
- viii. The project should positively impact Zimbabwe's ability to achieve its NDC, LEDS and climate related goals.
- ix. The project developer should be willing to transfer carbon credits into the Zimbabwe Carbon Registry (ZCR).

Project activities shall not be developed and implemented in areas designated as ineligible by the Government and if such activities are against the guiding principles of this framework and public policy objectives.

The Government, through regulations, will classify land-based activities in accordance with the area covered and will set stratified registration requirements for the different classes from time to time.

5.2. Project Developer Eligibility Requirements

All natural and juristic persons, both Zimbabwean and foreign, are eligible to register as Project Developers if they meet the following requirements:

- i. shall not have been convicted of any serious offence as defined in the Money Laundering and Proceeds of Crime Act;
- ii. shall possess and be able to demonstrate the necessary financial and technical capacity to implement the desired project;
- iii. shall disclose to the Authority all relevant carbon project information, including project costs; expected emissions reductions or removals over the entire project duration using approved methodologies;
- iv. foreign domiciled persons must establish a legal entity in Zimbabwe with a verifiable physical address and a named representative of that entity resident in Zimbabwe prior to the commencement of project implementation.

In order to ensure equitability and to facilitate the participation of locals in Zimbabwe's carbon markets, a three-tiered system of developer registration and project ownership is established. The recognised activity ownership classes are as follows:

- i. **Zimbabwean:** All Zimbabwean citizens shall be classified as onshore developers. Projects carried out as a joint venture or partnership shall be considered onshore in all cases where more than 50% of the share ownership is retained by a Zimbabwean citizen or entity.
- ii. **Foreign:** All non-Zimbabweans shall be classified as offshore developers. Projects carried out as a joint venture or partnership shall be classified as offshore if more than 50% of share ownership is retained by a foreign national.
- iii. **Public:** All Zimbabwean Government ministries, departments and agencies shall be classified as public developers. Projects carried out as a joint venture or partnership shall be classified as public if more than 50% of share ownership is retained by a Zimbabwean State entity.

As developers may register multiple projects with different ownership arrangements, the final classification for regulatory purposes will be made at the project level at the time of registration, re-registration or amendment.

Project owners shall be required to inform the Government of all changes in ownership. This may result in a project being reclassified based on the criteria outlined above. All projects and developers shall comply with all relevant rules and regulations applicable to their new classification upon meeting the threshold for reclassification.

5.3. Eligibility for acquiring parties

In line with UNFCCC decisions 2/CMA.3 and 3/CMA.3, the Government of Zimbabwe shall ensure that all parties acquiring Mitigation Outcomes (MOs) generated in Zimbabwe are eligible to do so under the relevant Article 6 of the Paris Agreement rules.

Zimbabwe shall distinguish between the eligibility requirements applicable to international transfers and other *first transfers*¹ which shall be subject to the conditions of the relevant Letter of Authorization (LOA), and domestic transfers which include all transfers of ownership within the ZCR.

All natural and juristic persons are eligible to acquire MOs generated in Zimbabwe if they meet the following eligibility criteria:

- i. They must hold an active account on the Zimbabwe Carbon Registry (ZCR).
- ii. They must not be subject to Zimbabwean financial sanctions.
- iii. They must possess sufficient financial resources to complete the transaction and honour the terms of any applicable Mitigation Outcome Purchase Agreement submitted for approval.

Compliance with these requirements shall be assessed by the Government during the ZCR account creation process and during regular due diligence checks.

All transfers from any account holder on the ZCR to any account on another carbon registry shall constitute international transfers. All international transfers except transfers from the ZCR to an account owned by the Government shall constitute a first transfer and shall be subject to a corresponding adjustment, unless determined otherwise.

All transfers completed internally between active account holders on the ZCR are considered domestic transactions, and as such shall not constitute “*first transfers*” for the purposes of Article 6 as defined by Decision 2/CMA.3.

5.4. Eligible Mitigation Outcome (MO) uses

Authorized Mitigation Outcomes (MOs) may only be first transferred or used for the uses specified on the applicable Letter of Authorization (LOA). The Government of Zimbabwe may authorize MOs for:

- i. Use towards another country’s NDC.

¹ As defined by the applicable CMA decision.

- ii. Other International Mitigation Purposes (OIMP) as defined by decision 2/CMA.3.
- iii. Use towards another country's NDC and/or OIMP.
- iv. Other mitigation purpose authorised by a CMA decision or the Article 6.4 Supervisory Body as applicable.

Authorized MOs may be transferred within Zimbabwe for uses other than those specified on the applicable LOA if prior authorization has been obtained from the Government.

5.5. Eligible Methodologies

In order to ensure that all authorised MOs registered by Zimbabwe are of the highest environmental integrity and creditability, all projects and activities must be carried out in accordance with an approved methodology. The Government shall ensure that all approved methodologies uphold the highest levels of environmental integrity and are aligned with international standards of best practice.

Developers may submit methodologies which may be subject to approval by the relevant international standards or may choose a pre-approved methodology. Under party to party arrangements, the Governments designated authority in collaboration with the acquiring party designated authority shall approve jointly developed or pre-approved methodologies.

In addition to the requirements set forth by each approved methodology, all developers must comply with the environmental integrity, sustainable development and environmental and social safeguarding requirements set in regulations, and all relevant UNFCCC decisions regarding the operationalisation of Article 6.

5.6. Eligibility requirements for independent auditors and verifiers

The Government of Zimbabwe shall require an entity qualified as an independent auditor or verifier (also known as "Designated Operational Entity" or DOE) to obtain a licence from the Government prior to commencing operations in Zimbabwe.

The DOE shall have sufficient technical and human resources with the necessary competence required for the type, range and estimated workload for each technical area in which the DOE intends to operate, within all sectoral scopes in which the DOE has applied for a licence.

All licensed entities shall remain compliant with the fundamental eligibility requirements outlined above and deregister any non-performing entities. All developers shall notify the Government of their chosen DOE before the commencement of any verification or validation work.

6. Zimbabwe's Approach to the Carbon Market

Zimbabwe has the prerequisite environment and regulatory framework for participating in the carbon market. Carbon trading and market activities in Zimbabwe is guided by four international frameworks. These are Cooperative Approaches (Article 6.2), the Paris

Agreement Crediting Mechanism (Article 6.4), Reducing Emissions from Deforestation and Forest Degradation (Article 5) and the Voluntary Carbon Market. Zimbabwe's approach to the carbon market recognises the complementary role of the frameworks named above and embraces them in their diversity.

6.1. Cooperative Approaches (Article 6.2)

Cooperative Approaches constitute bilateral agreements with other Parties to the Paris Agreement or in some cases "unilateral cooperation". Under this arrangement the following shall apply:

- i. Interested Parties must submit a letter of intent to develop a cooperative approach through the Government of Zimbabwe.
- ii. The Government of Zimbabwe is desirous to enter into Party-to-Party cooperative arrangements and may communicate through a letter of intent to another Party.
- iii. Project Developers must indicate the cooperative approach they wish to participate in.
- iv. If the proposed cooperation satisfies the eligibility requirements and relevant Zimbabwean policy, the Government shall proceed with the development and signing of a Memorandum of Understanding (MOU) outlining the intent to proceed with the proposed cooperation.
- v. Under the scope of the MOU, the Government of Zimbabwe may negotiate and draft a formal Cooperation Agreement for signing.
- vi. The Cooperation Agreement shall then be signed in accordance with any relevant Zimbabwean laws.

6.2. Paris Agreement Crediting Mechanism (Article 6.4)

Zimbabwe welcomes the implementation of Article 6.4 Mechanism activities guided by the rules, modalities and procedures provided by Decision 3/CMA.3, subsequent CMA Decisions and decisions of the Article 6.4 Supervisory Body.

The Government acknowledges and recognises the compulsory nature of the Article 6.4 Sustainable Development Tool, Article 6.4 project contributions to the Adaptation Fund and the automatic retirement of a proportion of A6.4ERs towards Overall Mitigation in Global Emissions (OMGE).

6.3. Reducing Emissions from Deforestation and Forest Degradation (Article 5)

Zimbabwe supports the implementation of REDD+ activities as enshrined under Article 5 of the Paris Agreement. REDD+ activities implemented in Zimbabwe should comply with the following:

- i. Warsaw Framework for REDD+
- ii. Cancun REDD+ Safeguards
- iii. Article 6 Guidance on Cooperative Approaches

Zimbabwe has developed a Forest Reference Emission Level and undertaken the REDD+ Country Needs Assessment. The Government prioritises the jurisdictional approach to REDD+ implementation.

6.4. Voluntary Carbon Market Participation

Zimbabwe recognises the importance of the voluntary carbon market and that some project developers may wish to market and retire their credits on this market. Projects that earmark their credits for the voluntary carbon market shall be subject to the same guiding principles and procedures as outlined in this framework and related regulations.

The Government further recognises that in pursuit of environmental integrity and in particular the avoidance of double counting, some voluntary carbon market buyers and end users may request authorisation and corresponding adjustments.

7. Authorization Requirements

The Government of Zimbabwe shall grant authorisations to eligible cooperative approaches, Mitigation Outcomes (MOs), and entities seeking to acquire and or use MOs generated in Zimbabwe. These authorizations shall be granted, amended and or revoked in line with all relevant CMA decisions, the procedures set forth in this policy, and any applicable Zimbabwean laws.

7.1. Authorization of cooperative approaches

In accordance with the Article 6 rules and any applicable CMA decisions, and in line with applicable carbon trading laws and regulations:

- i. The Government of Zimbabwe authorises Cooperative Approaches which promote higher mitigation and/or adaptation ambition, sustainable development and environmental integrity.
- ii. The authorisation of Cooperative Approaches shall be made effective by a Letter of Authorisation which shall clearly state the terms applicable to the authorisation.
- iii. The Government of Zimbabwe shall revise or revoke the authorisation for a cooperative approach if the Government determines that the authorisation does not support Zimbabwe's mitigation or adaptation ambition, is detrimental to sustainable development and/or environmental integrity or goes against Zimbabwe's national interests. Revisions to the authorization of a cooperative approach (or the revocation thereof) shall not affect any ITMOs or MOs that have already been first transferred or used for any reason.
- iv. The Government of Zimbabwe shall review, and if necessary, amend the authorisation of any Cooperative Agreement that is amended for any purpose. The revocation, cancellation or expiry of any Cooperative Agreement for any reason shall automatically result in the revocation of the applicable authorization.

7.2. Authorisation of entities and projects

In accordance with the Article 6 rules and any applicable CMA decisions, and in line with applicable carbon trading laws and regulations the Government of Zimbabwe authorises approved entities to receive, transfer and use authorised mitigation outcomes if the determination has been made that this authorisation shall promote high ambition in Zimbabwe's mitigation and/or adaptation efforts, sustainable development, and environmental integrity. The following conditions shall apply:

- i. Entities shall be authorised prior to the transfer of any authorised mitigation outcomes based on the requirements for participation set by the Government.
- ii. The Government shall revise and/or revoke the authorisation of entities or projects eligible to participate in Article 6 at any time if the determination is made that the current terms of authorisation do not support Zimbabwe's mitigation or adaptation ambition, sustainable development, and/or environmental integrity.
- iii. The revision or revocation of the authorisation of an entity or project eligible to participate in Article 6 shall not affect any authorised mitigation outcomes that have been first transferred for any reason in accordance with an active LOA.

7.3. Authorisation of Mitigation Outcomes (MOs)

In accordance with Article 6 rules and any applicable CMA decisions, and in line with applicable carbon trading laws and regulations:

- i. The Government shall authorise verified MOs created by an eligible Project Developer through the implementation of an approved project covered by an active Certificate of Registration and Letter of Authorisation and issued on the Zimbabwe Carbon Registry.
- ii. The Government shall authorise credits issued on the Article 6.4 Mechanism Registry in accordance with procedures set by the Article 6.4 Supervisory Body and any applicable CMA decisions.
- iii. The Government shall not authorise mitigation outcomes held on any registry other than the Zimbabwe Carbon Registry or the Article 6.4 Mechanism Registry.
- iv. MOs shall be authorised at the time of issuance on, re-issuance on, or transfer to, the Zimbabwe Carbon Registry.
- v. The Government shall apply a corresponding adjustment in accordance with all applicable CMA decisions and Article 6 rules to all authorised mitigation outcomes at the request of their owner or at the time of first transfer, whichever comes first.

The Government may revise or revoke the authorisation of mitigation outcomes if the determination is made that the current terms of authorisation are detrimental to Zimbabwe's mitigation and adaptation efforts, sustainable development goals, and environmental integrity.

8. Corresponding adjustment

Zimbabwe commits to applying corresponding adjustments to all authorised Mitigation Outcomes (MOs) issued on the Zimbabwe Carbon Registry (ZCR) or Article 6.4 Mechanism Registry at the time of first transfer, as per the requirements of decision 2/CMA.3 and any future guidance adopted by the UNFCCC. Transfers within the ZCR are not considered first transfers, and as such shall not automatically be subject to a corresponding adjustment.

As Zimbabwe has a single year NDC target, the government shall calculate the average number of MOs first transferred and used over the implementation period and apply corresponding adjustments equal to this average amount for each year in the NDC implementation period and in the NDC year using the most appropriate methodology. Corresponding adjustments are final and shall not be reversed following the submission to the UNFCCC of the relevant Biennial Transparency Report (BTR) for the year or years in which they were applied.

9. Environmental integrity requirements

In line with the Paris Agreement's long-term goal of limiting the increase in global temperatures to well below 2°C above pre-industrial levels, ensuring environmental integrity is crucial for Zimbabwe's participation in carbon markets.

All MOs generated in Zimbabwe are of the highest quality and all mitigation activities must comply with the following requirements to reduce the risk of over-crediting and non-permanence, whilst ensuring additionality and direct attribution:

- i. MOs generated in Zimbabwe shall be certified as representing real, verifiable, additional emissions reductions and or removals through an analytical science-based analytical model in accordance with a recognised certification standard.
- ii. The unit of measurement for emissions reductions and or removals shall be in tonnes of carbon dioxide equivalent (tCO_{2e}).
- iii. Carbon market activities shall not harm Zimbabwe's ability to achieve its NDC or to set more ambitious emissions reduction targets.
- iv. Corresponding adjustment shall be applied to authorised mitigation outcomes.
- v. A percentage of the total volume of authorised mitigation outcomes generated in Zimbabwe shall be retired towards Zimbabwe's NDC and another portion shall be directed to the national buffer account. The percentages shall be determined by the Government and enshrined in regulations.
- vi. All retirements executed on the Zimbabwe Carbon Registry shall be irreversible.
- vii. The risk of over-crediting shall be minimised through;
 - (a) setting conservative baselines below Business as Usual (BAU) projections;
 - (b) using the Forest Reference Emission Level (NFREL) where applicable;
 - (c) using approved methodologies and reputable independent crediting standards in line with international standards of best practice; and

- (d) reducing, quantifying and accounting for leakage.
- viii. Additionality shall be clearly defined and only mitigation projects that would not have occurred without the carbon project and carbon finance shall be eligible.
- ix. All credited emissions reductions and removals represent long term, durable or permanent emissions reductions or removals.
- x. No two projects of the same type shall be implemented in the same area (granting approval to the first project which has received a Letter of Authorisation or whichever project is deemed to provide greater benefit to national best interest where two competing applications are submitted);
- xi. The integrity of the transfer and accounting system through which Zimbabwean credits are issued, transferred and used, shall be ensured through:
 - (a) requiring all authorised mitigation outcomes to be issued on, or transferred to the Zimbabwe Carbon Registry or the Article 6.4 Mechanism Registry;
 - (b) basing the Zimbabwe Carbon Registry on the best available technology; and
 - (c) making all relevant information available on the ZCR public interface.

10. Environmental safeguards

The Government recognises that the development and operation of mitigation activities may entail environmental risks beyond those factors addressed by the environmental integrity requirements adopted with this framework. In line with national and international law, Zimbabwe shall take utmost efforts to limit real and potential environmental harm resulting from the development of mitigation activities including but not limited to:

- i. Biodiversity loss and ecosystem disturbance
- ii. Damage to critical habitats
- iii. Water depletion
- iv. Water pollution and wetland destruction
- v. Soil damage/erosion
- vi. Air pollution
- vii. Land pollution and degradation
- viii. Noise pollution

In line with this principle, the Government shall not approve activities which are likely to result in significant harm to the nation's natural environments, resources, and biodiversity. Developers must demonstrate that they have fully considered all environmental risks and developed a verifiable strategy to minimise and mitigate any such risks or potential harm that cannot be avoided. All developers shall be required to conduct an environmental risk assessment, develop a harm mitigation plan as guided by the law.

In addition to the general environmental safeguarding requirements, further requirements or restrictions may be imposed on projects or activity types deemed to be high risk.

11. Sustainable development

All mitigation activities authorised and registered by the Government of Zimbabwe are required to make meaningful, tangible, and measurable contributions to sustainable development. These contributions must be aligned with national development plans, the national low-emission development strategy, and the United Nations Sustainable Development Agenda. Project Developers shall be required to provide evidence of anticipated sustainable development benefits.

Project investment plans must elaborate how a proportion of the total investment shall be made directly in local communities for sustainable development purposes including but not limited to decent employment, improved livelihoods, energy access, environmental restoration and other purposes as prescribed by law. The Government may impose additional requirements.

To encourage the transition towards modernisation and cleaner technologies, the Government may require that certain project activities be designed to progressively move towards lower emission and user-friendly technologies over the course of their implementation.

12. Social safeguards

The Government shall not authorise and register mitigation activities that will negatively impact communities, sustainable livelihoods, cultural heritage and their ability to exercise rights guaranteed by the Constitution of Zimbabwe. Developers shall negotiate with communities in good faith and must ensure full representation of their diverse interests.

In line with the precautionary principle, it shall be assumed that all projects may have an adverse impact on communities. Prior to project approval, all developers must satisfactorily demonstrate that they have considered all sources of potential harm and taken tangible actions to reduce the risks associated with the activities for which approval is sought.

In addition to the social safeguards outlined by the Government, REDD+ projects shall adhere to the Cancun REDD+ Safeguards.

Developers shall be liable for any harm that may be caused by the development and implementation of their project. In order to mitigate the risk of harm, and to address instances where harm may have occurred all developers must comply with the following social safeguarding requirements and guidelines.

12.1. Stakeholder and Public Participation

Developers shall be required to involve the public and affected stakeholders in all stages of the project development and implementation process. In order to maintain the integrity and transparency of the public and stakeholder consultation process, the Government shall establish the processes and procedure for stakeholder and public consultations through relevant regulations and standard operating procedures.

Project Developers shall provide clear evidence of public and stakeholder consultations before project registration and whenever such evidence is required during project implementation.

12.2. Free, Prior, and Informed Consent

The Government recognises that local communities and affected stakeholders have the right to grant or withhold consent for activities that will affect them and their resources. Developers shall be required to obtain Free, Prior, and Informed Consent (FPIC) from all communities whose lands or resources may be impacted by a proposed project. Developers shall be required to obtain and satisfactorily demonstrate FPIC at all stages of project development and implementation.

For the purposes of this framework, FPIC refers to consent for the developer to proceed with project planning, feasibility studies, implementation and to involve affected communities in the decision-making process. In order to maintain the integrity and transparency of the FPIC process, the Government shall establish the processes and procedure for FPIC through relevant regulations.

12.3. National Grievance and Redress Mechanism

To ensure compliance with social safeguards and to address instances where harm may have occurred, the Government shall establish an independent National Grievance and Redress Mechanism (NGRM). The NGRM shall have the mandate to receive and investigate grievances relating to all stages of the project development and implementation. The NGRM shall investigate grievances in a timely, confidential, and transparent manner.

In addition to the NGRM, all developers shall be required to develop and implement their own grievance and redress mechanisms to handle complaints arising from the implementation of approved activities. These arrangements must be developed in consultation with all affected parties and must be able to handle complaints in a timely, transparent and culturally appropriate manner. Stakeholders must be able to submit grievances anonymously and without the payment of any fees.

13. Measurement, Reporting and Verification

The Government of Zimbabwe shall establish procedures for the measurement, reporting and verification (MRV) of mitigation activities and associated sustainable development benefits.

Project Developers must maintain a record of all activities and or events impacting carbon sequestration or emissions reductions within the scope of an approved and registered project for the duration of the validity of the applicable Certificate of Registration.

As and when necessary, the Government or its authorised agents shall conduct MRV of the project area and activities. The Government shall establish the processes and procedure for MRV of carbon projects.

All project developers shall adhere to the MRV system as prescribed by the methodology and standard being employed in the execution of the mitigation activity.

The development of the Article 6 Initial Report is the responsibility of the respective Project Proponent whose project is part of the Initial Report. The report should be developed in accordance with templates provided by the UNFCCC Secretariat. The draft Initial report is submitted to the Government for review and subsequent submission by the Zimbabwe Carbon Markets Authority (ZiCMA) to the UNFCCC Secretariat through the official channel.

In addition, Project Developers shall assist the Government with all project related information and data required to report to the UNFCCC including but not limited to Annual Information and Regular Information to enable fulfilment of reporting requirements in accordance with Article 13 of the Paris Agreement and with respect to Chapter IV. A-C of Annex to Decision 2/CMA3 and other subsequent decisions under the UNFCCC.

14. Institutional arrangements

14.1. Designated National Authority

The Government has established the Zimbabwe Carbon Markets Authority as the designated national authority for carbon trading in Zimbabwe.

The functions of the Authority are to:

- i. facilitate the assessment, approval and registration of carbon projects, developers and verifiers;
- ii. ensure projects contribute to Zimbabwe's NDCs, LEDS and SDGs;
- iii. authorise entities, carbon projects and MOs;
- iv. facilitate the monitoring and reporting of carbon project and carbon market activities;
- v. promote and raise awareness on carbon trading;
- vi. establish and maintain the ZCR and ensure its interoperability with other carbon registries.

14.2. Zimbabwe Carbon Registry

The Government has established the Zimbabwe Carbon Registry (ZCR) to track and report the issuance, transfer, and use of MOs generated in Zimbabwe. The functions of the registry shall among other things, be to:

- i. Facilitate the issuance, transfer, cancellation, retirement and use of uniquely identified MOs that are linked to, and convey, a genuine claim to emissions reductions generated by approved mitigation activities.

- ii. Ensure the environmental integrity of all MOs generated in Zimbabwe by preventing double counting and allowing for the management of buffer pools.
- iii. Promote transparency by making information on mitigation activities and ITMO transfers approved by the Government publicly available.
- iv. Facilitate private participation in high-integrity carbon markets and provide a secure record of MO ownership.

The Government shall develop detailed standard operating procedures on the functions of the registry.

Recognising the risk of over-issuance and reversals, the Government has established the National Buffer Account (NBA) in accordance with the environmental integrity requirements. The Government of Zimbabwe shall determine the proportion of carbon credits that will channelled towards the NBA through regulation.

The Government of Zimbabwe shall determine a proportion of carbon credits issued on the Zimbabwe Carbon Registry shall automatically be used to contribute towards the fulfillment of Zimbabwe's NDC.

The Government of Zimbabwe shall establish the National Transaction Account on the Zimbabwe Carbon Registry in which the share of MOs due to the Government of Zimbabwe as prescribed by law shall be deposited.

15. Benefit sharing

15.1. National level benefit sharing

Carbon project activities undertaken in Zimbabwe shall be subject to a levy to be determined by the Government. The levy shall, to the extent possible, be set at such a level that ensures compensation related to opportunity costs associated with ITMOs and costs associated with effecting a corresponding adjustment to the National GHG Inventory.

The purpose of the levy shall be to promote carbon trading in Zimbabwe, climate change adaptation, responding to climate related loss and damage, and mitigation initiatives as well as administrative cost related to regulating carbon market activities.

15.2. Project level benefit sharing

All carbon market activities implemented in Zimbabwe shall demonstrate that they deliver sustainable development benefits as prescribed at law, as required by the standard and methodology they are using to generate credits and in accordance with agreed terms with project beneficiaries at the institutional and community levels.