IETA

LAC Working Group Position Paper

August 2025

RECOMMENDATIONS TO

STRENGTHEN CARBON MARKETS IN LATIN AMERICA AND THE CARIBBEAN


MAKING NET
ZERO POSSIBLE

IETA

IETA, as the leading global association of carbon market actors, seeks to support the establishment of effective market-based trading systems for greenhouse gas (GHG) emissions reductions and removals that are environmentally robust, fair, open, efficient, accountable, and consistent across national boundaries. In this regard, **the objective of this paper is to present recommendations from IETA and its members to Latin American and Caribbean (LAC) governments for the robust construction of carbon pricing instruments (CPIs) in the region**.

To this end, the document focuses on five sections:

01. Carbon market state of play across LAC
02. Coordination and harmonization of carbon pricing instruments
03. Article 6 and Nationally Determined Contribution 3.0 (NDC 3.0): a key strategy to increase climate ambition and promote investment in the region
04. Robust registries to strengthen market development
05. Governance, public-private collaboration, and legal certainty

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Carbon market state of play across LAC

Currently, LAC has 16 operational CPIs and 7 under development. 18 of these are carbon taxes, and 5 are emissions trading systems, with a total of 13 instruments allowing the use of carbon credits as a flexibility mechanism. Additionally, another 8 countries have developed regulations related to the voluntary carbon market (VCM) and voluntary GHG measurement programs. Regarding Article 6, 12 countries have advanced regulations or signed agreements with purchasing countries for Internationally Transferred Mitigation Outcomes (ITMOs). In total, this means that **LAC accounts for 20% of the total operational CPIs globally**.

Progress in CPIs has not only occurred at the national level. It is worth highlighting how subnational states are playing an increasingly active role in market development. In Mexico, 12 states[1] have implemented or are developing carbon taxes. In Brazil, 6 states[2] have jurisdictional programs. Meanwhile, in Argentina, 6 provinces[3] have issued regulations to encourage the VCM.

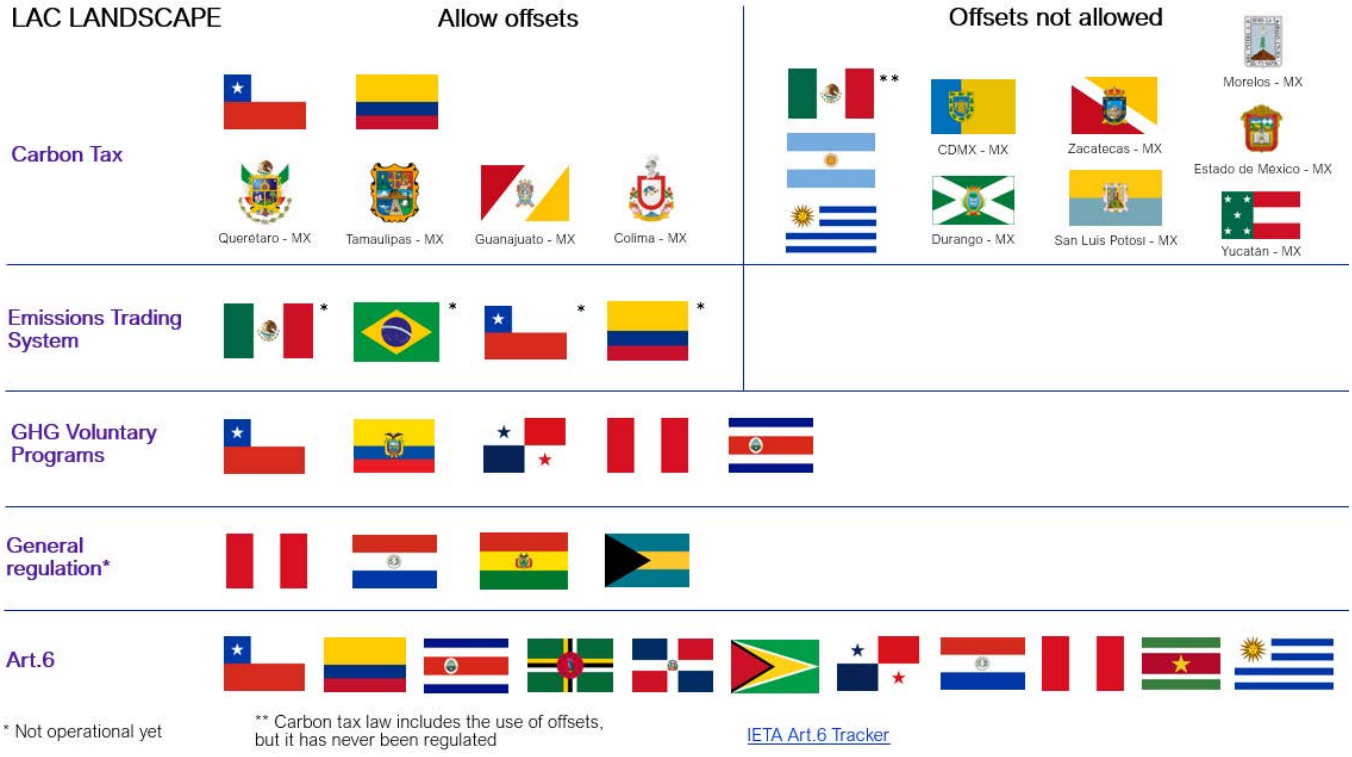
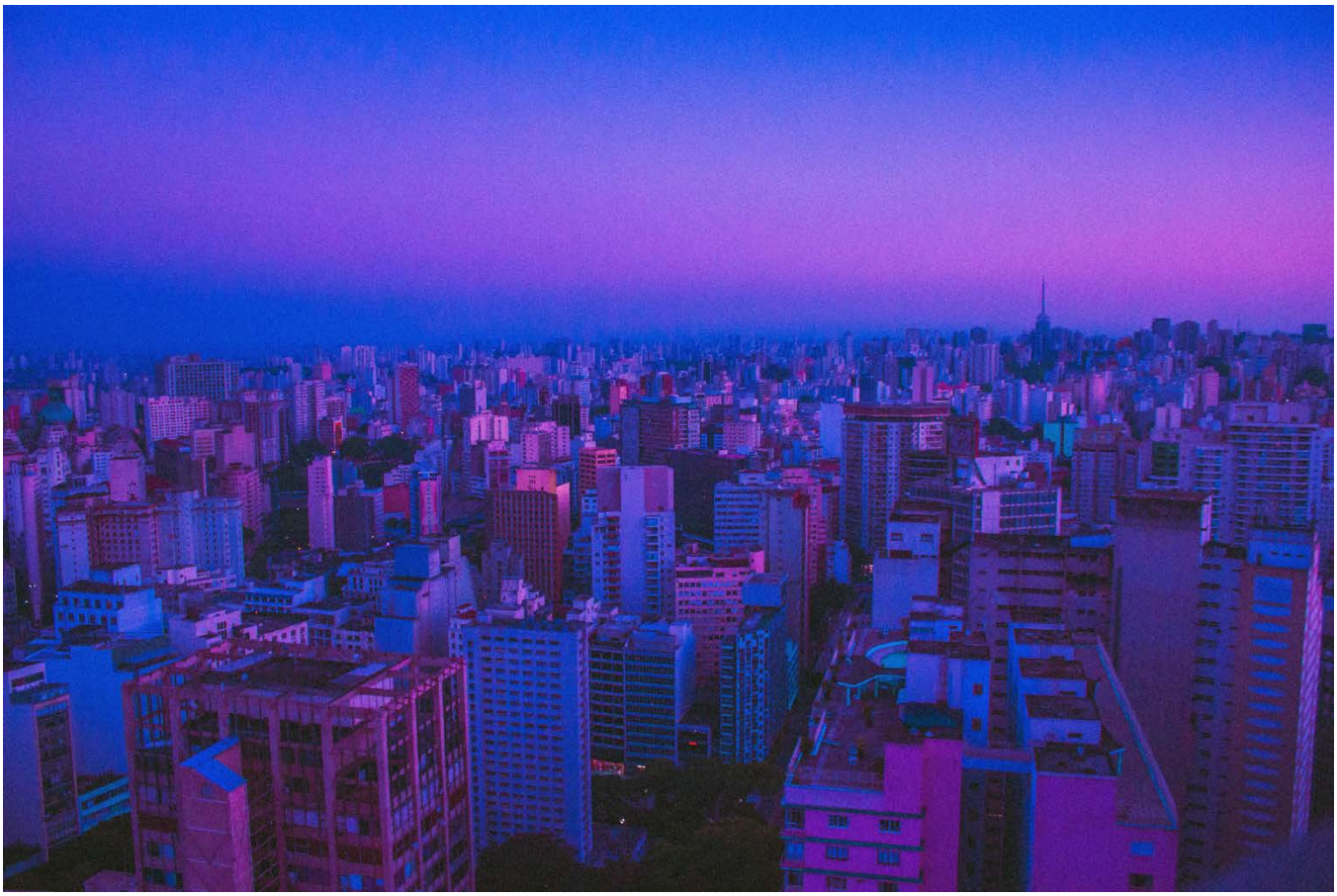


Figure 1: Status of carbon pricing instruments in Latin America and the Caribbean.

Although LAC is not one of the continents with the most significant responsibility in terms of emissions, accounting for 8% of the total[4], it is among those with the highest potential for climate change mitigation, and therefore with the most significant opportunities to generate carbon credits. **Nearly 23% of the world's total carbon credit retirements[5] and 24% of global issuances**[6] come from the LAC region. This can be primarily explained by its wealth linked to Nature-Based Solutions (NBS).

On the other hand, Latin America, just after Southeast Asia, is the second largest recipient region of investments for carbon project development in 2023, with US$1.5 billion. In order, the top four countries receiving these investments were: Mexico (26%), Brazil (24%), Colombia (20%), and Peru (6%)[7]. Additionally, according to a survey conducted by IETA and Article 6 Implementation Partnership (A6IP) of more than 100 companies working in carbon markets, South America ranked as the second region in the world of most significant interest for investors to develop carbon projects under Article 6 or acquire ITMOs, again, after Southeast Asia[8].

As the previous data illustrates, LAC countries have made progress in enabling regulation and demand for the development of carbon markets, highlighting the importance of ensuring these instruments operate with integrity, transparency, efficiency, and consistency. Below are a series of key recommendations on various regulatory aspects that governments can consider when designing and implementing their CPIs. It is important to note that these suggestions are neither exhaustive nor prioritized, and that they can be supplemented with other considerations tailored to each context.



Coordination and harmonization of carbon pricing instruments in Latin America and the Caribbean

As CPIs continue to expand across Latin America and the Caribbean, harmonization between different instruments at the regional, national, and international levels has become increasingly urgent to ensure environmental integrity, economic efficiency, and regulatory coherence.

Harmonization can take several dimensions:

- Technical: Compatible monitoring, reporting, and verification (MRV) infrastructure and registries
- Legal: Mutual recognition of carbon units
- Institutional: Alignment of governance structures
- Environmental: Shared requirements for integrity and additionality
- Financial: Similar carbon prices

When well-promoted, harmonization can underpin the development of a regional carbon market architecture that facilitates the private sector's investments and interaction with CPIs, international linking under Article 6 of the Paris Agreement, and support countries in achieving their NDCs.

Countries that have several pricing instruments simultaneously, whether operational or in the design stage, face significant challenges in terms of coordination and harmonization. Such is the case of Colombia and Chile. Both have national carbon taxes that allow the use of carbon credits and, at the same time, are in the process of designing their emissions trading systems, or emission standards in the case of Chile. Additionally, Chile is developing regulations concerning Article 6 and the voluntary GHG certification system.

Likewise, we can observe the case of Mexico, where CPIs at the subnational and federal levels must also be harmonized, which introduces a degree of complexity by requiring coordination between autonomous governments. It should be noted that Mexico has 11 states currently implementing carbon taxes and an emissions trading system expected to begin operations in 2026. These are some examples, among others, that can be found across the region where synergies and harmonization are required between different regulations in the same country and between national and subnational approaches.

Given the diversity in contexts, approaches development stages, and institutional capacity, **coordination between jurisdictions and harmonization on elements** such as registry infrastructure, MRV, threshold and emissions coverage, integrity principles, carbon prices, and legal frameworks **can significantly help to establish an agile and transparent foundation upon which private sector investments in mitigation can scale up through carbon markets**.

Colombia, Chile, and Queretaro can serve as models for future regulations on the use of carbon credits within domestic compliance systems. All three jurisdictions have well-established carbon taxes that allow the use of carbon credits issued by internationally recognized GHG crediting programs. The creation of regulatory frameworks based on this approach has facilitated and streamlined the implementation of mitigation activities through clear rules that leverage existing approaches, ensure the high integrity of carbon credits, and promote the robustness of their national systems. These developments should inform regulations in other countries of the region and support the emergence of more standardized environmental and technical criteria across LAC jurisdictions, increasing transparency, market confidence, and climate investments in the continent.

Moreover, harmonized CPIs can unlock private sector investments by reducing uncertainty and transaction costs. A consistent regulatory environment enables companies to operate across borders with confidence in the fungibility of carbon units and the credibility of mitigation outcomes. For LAC, this could also mean increased access to blended finance mechanisms and results-based climate finance, accelerating investments to reduce emissions in key sectors such as energy, transport, waste, and AFOLU.

As LAC countries engage in Article 6 cooperation and explore the use of carbon credits under compliance mechanisms, international best practices from other regions can also inform on how jurisdictions with compatible technical and legal frameworks can benefit from a joint market, reducing costs and increasing efficiency. An example LAC countries may consider is the Western Climate Initiative (WCI), which links the California, Washington, and Quebec emissions trading systems. With multiple countries in LAC implementing their CPIs, early coordination between countries is key to ensuring that CPI design across the region shares alignment on key preconditions for linking, such as environmental ambition equivalency, common integrity criteria, alignment on carbon credits usage, robust MRV systems, and transparent governance.

In this sense, it is relevant to highlight initiatives such as the Carbon Pricing in the Americas[9] and the Pacific Alliance, whose MRV Sub-technical Group[10] is working on MRV standardization across the Pacific Alliance countries. Both are spaces for collaboration, capacity building, and exchange of experiences between governments and specialized consultants with the objective of enabling greater harmonization and coordination across jurisdictions.

The conclusion of the Article 6 rulebook at COP29 can facilitate carbon market convergence; however, with diverging perspectives and definitions of credit quality, additionality, and permanence across jurisdictions, challenges for harmonization remain significant. Moreover, technical inconsistencies, such as differing emission baselines, sectoral coverage, and/or registry functionalities between jurisdictions, can also make harmonization across the region challenging.

To overcome these barriers, building trust and transparency by developing registries compatible with international platforms like the Climate Action Data Trust (CAD Trust)[11], and endorsing internationally recognized quality principles, including, among others, the Paris Agreement Crediting Mechanism (PACM)[12], the International Carbon Reduction and Offset Alliance (ICROA)[13], the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA)[14], and the Integrity Council for the Vountary Carbon Market (ICVCM)[15], can help the region capitalize on new carbon market opportunities during the process.

Addressing these challenges can bring multiple benefits. That's the reason why **IETA invites LAC governments to increase harmonization and coordination of CPIs in the region**. With COP30 taking place in Brazil, there is an opportunity for **LAC countries to agree on a common overarching set of principles on integrity and environmental claims for carbon credits, drawing on existing approaches and integrity initiatives**.

Such clarity and predictability are key to enhancing market confidence, positioning the region as a credible actor in the global carbon market architecture, attracting international private sector investments to support the achievement of the NDCs, and increasing climate ambition. Likewise, LAC's potential to articulate carbon markets under Article 6 represents a unique opportunity for it to position itself as a regional hub for climate innovation with a clear connection to the continent's adaptation and resilience needs.

Article 6 and NDC 3.0: A key strategy to increase climate ambition and promote investment in Latin America and the Caribbean

International cooperation through the market mechanisms of Article 6 of the Paris Agreement represents one of the most significant opportunities for LAC in this decade. Beyond being a tool for meeting climate targets, Article 6 positions itself as a catalyst for sustainable development, capable of attracting private investment flows, fostering innovation and technology transfer, and generating economic and social benefits. By actively participating in these mechanisms, countries in the region can accelerate their transition toward a low-carbon economy, enhance the competitiveness of their industries, and ensure that climate action directly contributes to national priorities for growth and well-being.

The momentum in the region is already evident: To date, a dozen countries in LAC (Bolivia, Chile, Colombia, Costa Rica, Dominica, Panama, Paraguay, Peru, the Dominican Republic, and Uruguay)[16] have taken concrete steps in terms of regulation and bilateral cooperation under Article 6.2 by signing Bilateral Agreements or Memoranda of Understanding (MoU), positioning the region as an active partner with enormous potential on the international stage. This demonstrates not only governments' intention to address the current climate urgency, but also the opportunity to use the present cycle of updating NDC 3.0 to consolidate this progress.

On the other hand, two countries in the region, Guyana and Suriname, have already submitted their Initial Reports and have passed the Technical Expert Review stage[17]. It is worth noting that these approaches are unilateral, meaning they are not framed within a Bilateral Agreement or MoU with another country. Additionally, it should be mentioned that ITMOs from Guyana are eligible for CORSIA, while the eligibility of those from Suriname is under discussion.

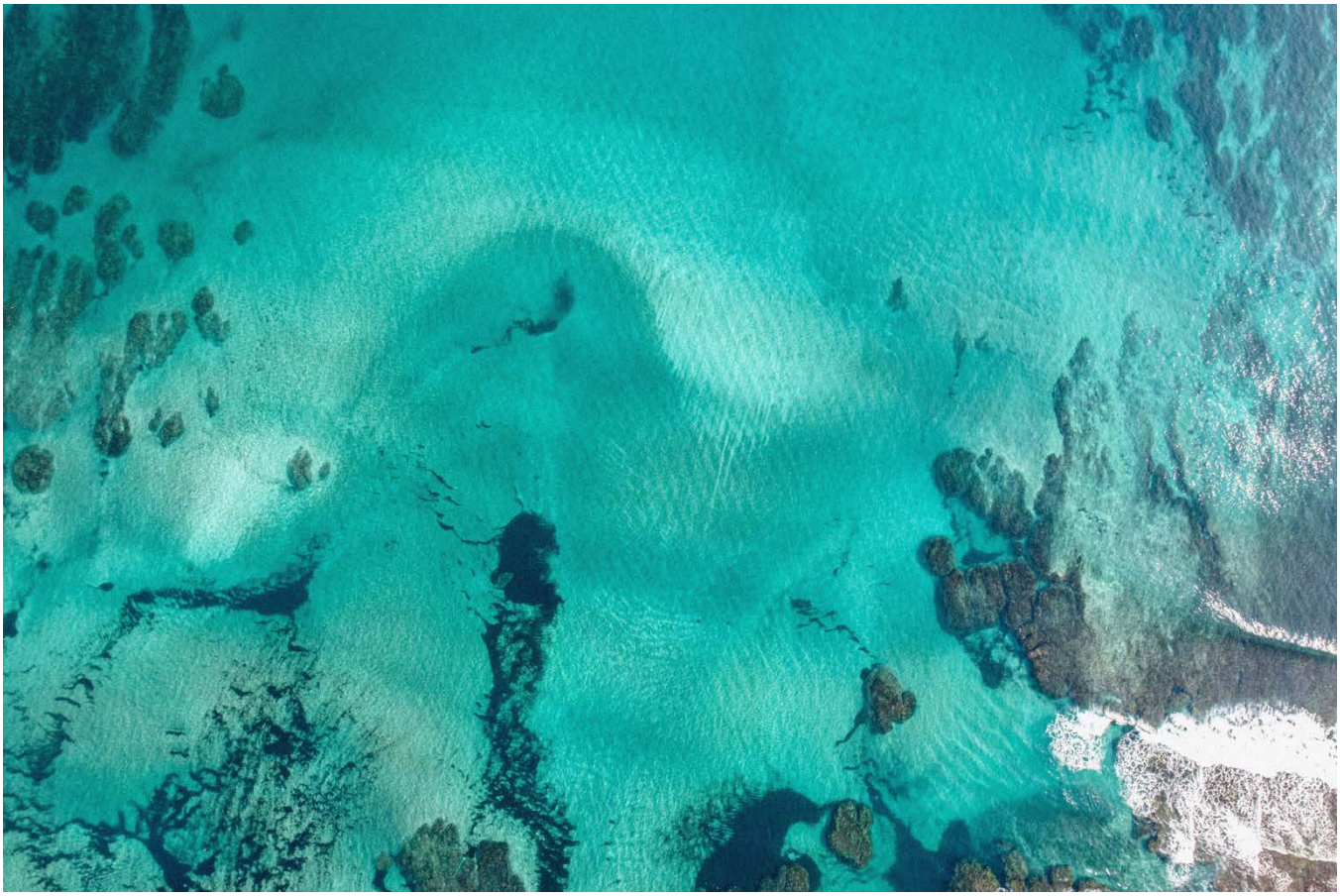
In this context, IETA emphasizes that **the new NDCs must serve as the strategic planning instrument to formalize the willingness of countries to implement Article 6, laying the institutional, technical, and regulatory foundations that transform the initial interest of the private sector into large-scale, high-integrity mitigation projects**[18]. They should be the starting point that not only communicates a country's climate ambition but also establishes the investment logic that the private sector and international partners need to commit long-term capital. For this, the NDCs must be deeply aligned and conceived from national policies, development priorities, and climate plans, ensuring coherence and purpose. In this regard, **we invite the countries of the region to follow the recommendations expressed by IETA in the document** available here **on NDC 3.0 and Article 6**.

However, a narrative of ambition alone is not enough. For Article 6 to serve as an effective catalyst for private financing, NDC 3.0 must offer clarity, legal certainty, and predictability. A clear call to action is needed, driven by national strategies and action plans that are feasible to implement. Nevertheless, to date, only six countries in the region (Belize, Brazil, Cuba, Ecuador, Saint Lucia, and Uruguay) have submitted their new NDC 3.0[19].

One of the biggest challenges currently facing Article 6 in unlocking its true potential is the structuring of mitigation targets within the NDCs. To ensure the direct benefits of international market mechanisms, **it is vital to break down NDC commitments, clearly distinguishing between unconditional targets and those conditional** on receiving international financing. In this regard, by explicitly linking conditional targets with international climate finance, countries can position **Article 6 as a concrete tool to mobilize private investment, aiming to increase ambition and fulfill their committed targets**.

Transformative changes required by carbon markets —mobilizing investment, building institutional capacity, and transferring technology— unfold over medium and long-term horizons that go beyond the five-year cycles of the NDCs. In this context, Article 6 should not be seen solely as a compliance tool for 2035, but as **a dynamic engine for sustained ambition that can and must be activated today**. Remaining static or simply failing to act to implement Article 6 would represent a tremendous risk, potentially delaying investments and wasting valuable time in this critical decade for climate action.

Early engagement with Article 6, enabled by clear and well-structured NDC 3.0s, presents a significant opportunity to unlock the necessary financing to lay the groundwork for increasing ambition, allowing the LAC region to capitalize on its potential and position itself as a leader in the global climate economy.



Robust registries to strengthen market development

Any market that trades commodities or securities requires a robust registry to ensure the existence of the units, track transactions, prevent double-counting, and guarantee the ownership of the traded asset. The carbon market is no exception to this reality.

As a reminder, a carbon registry is a digital, electronic database designed to track and manage the life cycle events of carbon instruments. This essential component of carbon market infrastructure enables national and state-level authorities to gather information on emission-reducing and removal activities[20]. In short, registries serve as tools for tracking carbon unit issuance, transfers, retirements, and corresponding adjustments. Likewise, having a registry is key for countries to maintain control, traceability, and security of the information and accounting that will be used for the quantification of their NDCs through the generation of reports[21]. In fact, having a registry is a requirement under Article 6 of the Paris Agreement.

This highlights the importance of LAC countries having registries aimed at enabling CPIs and creating enabling conditions for the private sector. However, the reality shows us that there is still a significant journey ahead for the region.

Gráfica 2. Status of registries in LAC

According to the graph above, **LAC has 8 operational registries and 9 mandated by regulations that are still in development**. Although this seems like significant progress, many jurisdictions still have registries yet to be developed. Additionally, **several of the operational registries lack the recommendations provided by the Carbon Markets Infrastructure Working Group**[22]. Some are even manual registries using spreadsheets or digital tools that are not suitable for this purpose.

This working group, led by the World Bank, brings together a range of organizations specializing in carbon market infrastructure and was created with the aim of identifying key bottlenecks that hinder the security, efficiency, and interoperability of carbon market infrastructure, as well as outlining priority areas for action to address these challenges in the medium and long term[23]. In this context, some of the points discussed and recommendations provided by the working group relate to:

- **Ecosystem governance**: The need for clearly defined roles among key actors, including crediting programs, validation and verification bodies (VVBs), registry providers, national authorities, and project proponents.
- **Transaction integrity**: Robust safeguards against fraud, misconduct, and unethical behavior are an essential element to ensure that carbon credit transactions are secure, transparent, and compliant across jurisdictions and platforms.
- **Information security**: Robust digital safeguards are a critical item to protecting sensitive data, maintaining market credibility, and enabling reliable, cross-border processes.
- **Data & systems interoperability**: Interoperability enables seamless, accurate, and transparent tracking of carbon credits across different programs, jurisdictions, and use cases, reducing duplication, improving efficiency, and enhancing trust in market operations.
- **Digital MRV**: The transition to dMRV as a central consideration to scaling carbon markets with integrity—providing the digital infrastructure needed to enable transparent, efficient, and trustworthy climate action at scale.

IETA invites the countries of the region to follow the recommendations presented by the Carbon Markets Infrastructure Working Group **for the design, development, implementation, administration, and maintenance of their registries**.

Similarly, it is important to mention the options available to countries in the region to have registries tailored to their needs and circumstances. These include using an open-source registry, developing their own registry, or utilizing a specialized provider. Each option has its advantages and disadvantages, as shown in the following figure and S&P report:

Technology options available to build a national registry

	Advantages	Challenges
Open-source registry		
	Cost-effective	Limited flexibility
		Maintenance concerns
In-house proprietary registry		
	Customization	Resource intensive
	Governance control	Time-consuming
	Data sovereignty	
International registry provider		
	Robust functionality	Cost
	Technical and operational support	

Likewise, it is important to recognize that there are different specialized providers, cooperation agencies, and multilateral banks that can help countries in the region move forward with the design, development, implementation, administration, and maintenance of their registries. For example, governments can collaborate with independent standard registries and the CAD Trust to track mitigation activities and carbon units within their territory and prepare any necessary reports in the absence of a national registry. Additionally, the UNFCCC International Registry[24] is also an option for countries to use for Article 6 accounting.

Governance, collaboration between the public and private sectors, and legal certainty

Public and private sector dialogue

The challenges posed by climate change demand collective action by governments, industries, and societies at large. Fortunately, the objectives of the official and private sectors are largely aligned. But shared objectives are not sufficient to meet this challenge. **We need continuous collaboration and dialogue between the official and private sectors to make meaningful progress on climate change**. It must be a partnership[25].

Maximizing private sector participation in global climate action requires a robust, structured dialogue. When governments establish inclusive dialogues with representatives of the private sector as well as international organizations, civil society, and communities, they can produce more integrated and comprehensive strategies for addressing this crisis[26]. Consequently, this enables the development of an environment conducive to implementing carbon market-friendly policies. Additionally, dialogue between governments and private sector representatives has historically proved essential in creating conditions that are more favorable to economic growth, thus reducing poverty and promoting shared prosperity[27].

It's essential to highlight that effective dialogue on carbon markets can produce a range of proposals and strategies, including:

- Legal and regulatory reforms to accelerate carbon market dynamics
- Incentivizing public-private partnerships and collaboration
- Rewarding good practices, while discouraging bad practices in the market
- Providing access to finance for large and small businesses as well as for citizens
- Strengthening carbon market governance

An example that can serve as a reference for governments in the region is Mexico. Through regulation, the government institutionalized the Consultative Committee on the Emissions Trading System (COCOSCE) as a permanent technical body for consultation, social participation, and advice to the federal public administration on emissions trading. COCOSCE is made up of government ministries and entities, as well as private sector associations.

In this regard, **IETA calls for building and maintaining a close relationship between the private sector and the various ministries and public institutions related to carbon markets** through: stakeholder consultations, formal and informal substantive dialogue with stakeholders, multi-stakeholder workshops for the public exchange of views, joint government/stakeholder working groups, and clear channels and mechanisms for information exchange[28].

It is equally important to note that **IETA brings together a wide range of experts represented among its approximately 340 members and IETA's team, all of whom have experience in different markets around the world and are fully capable of contributing to discussions and the development of CPIs in LAC**.

Finally, it is understandable that some governments in the region are more open than others to dialogue. This depends on various elements such as the current administration's openness to the private sector, its stance on carbon markets, and the willingness of the public officials responsible for the issue. Similarly, there are ministries and environmental entities that lack experience in engaging with the private sector. **This process is a path forward that IETA is willing to support as an association with a view to strengthening ties between the public and private sectors.**

Institutional capacities in the public sector

In LAC, public management faces complex challenges such as a shortage of staff, high personnel turnover, and a lack of resources. The region's environmental ministries and related agencies are no exception to this reality. This situation is further complicated by the fact that they are often among the ministries that receive the least funding from the national general budget in their respective countries.

Considering that moderate economic growth is expected in LAC in the coming years and that the region's fiscal deficit averaged 3.1% of GDP in 2024[29], it is unlikely that environment ministries and related entities will have the personnel and resources necessary to lead policy, generate timely regulation, operate CPIs, and invest in infrastructure.

In this regard, IETA and its members recommend the following actions:

Financing from CPI: Secure budget allocations to ensure the technical teams and the operation and maintenance of CPIs. These resources can come from the general budget of the public entity responsible for the topic or from revenues obtained through CPIs. For example, Brazil established that 15% of the revenues from the ETS will be used for the operation and maintenance of the ETS. Likewise, Paraguay set fees for registrations, transfers, and modifications in the use of the national carbon registry.

Efficient regulation: Considering that various countries in LAC are regulating different types of carbon markets, it is recommended to develop regulations that do not create excessive operational burdens for the technical teams of environmental ministries and responsible agencies. If there are insufficient capacities, it is advisable for:

- Technological infrastructure —such as registry, auction, and trading systems— to be designed, developed, and operated by specialized institutions.
- Approval of standards and methodologies based on initiatives such as ICROA, PACM, ICVCM, and CORSIA, as stated previously.
- Encourage the use of carbon credit rating agencies to provide independent quality assessment at a project-specific level.

International cooperation: Utilize the various international cooperation opportunities offered by different institutions at the technical, resource, and personnel levels to support the work of State entities. Below is a classification of entities that operate and provide assistance in the region:

- United Nations System: UNFCC, UNEP, UNDP, GCF
- Multilateral Banks: World Bank, CAF, IDB
- Cooperation Agencies: GIZ, UKPact, Euroclima
- Specialized Entities: IETA, ICAP, A6IP, GGGI, CACE, international crediting programs, among others.

The role of the public sector

Among other functions, the State is responsible for designing and executing public policies, regulating economic activities, and ensuring the enforcement and compliance of laws. In this context, **it is not advisable for ministries to directly operate activities related to carbon markets, especially when the required capacities and resources are lacking, as previously illustrated**.

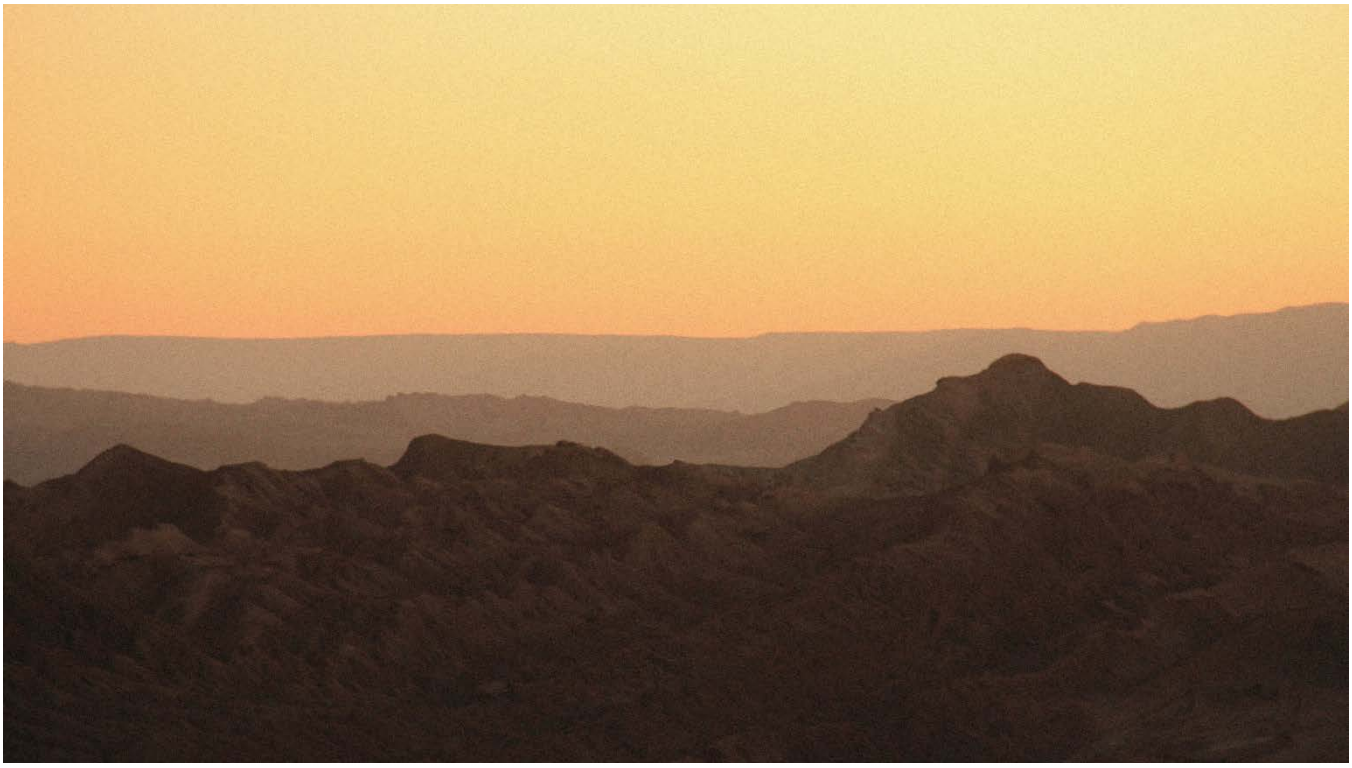
Additionally, environment ministries are known for their expertise in environmental issues; therefore, their capacities and functions should be clearly defined, and they should seek support from other departments, such as the ministries of economy, treasury, and finance, on technical market-related topics. Except for jurisdictional programs —where the public sector does play a predominant role— it is recommended that the operational functions of the carbon market fall to specialized actors from the private sector and civil society.

The financial and energy sectors serve as strong examples of how carbon markets can function. In these sectors, the State is responsible for leadership and public policy, regulation, planning, and supervision. However, the development of economic activity, market operation, and coordination is usually handled by companies, whether they are private, public, or mixed. In this sense, **we call on ministries of environment and public entities related to carbon markets to conduct a benchmarking exercise with the financial and energy sectors**[30], particularly regarding how the public sector performs its functions related to markets.

Legal certainty for market growth

The private sector needs a sound legal framework to create greater certainty and confidence to operate. A clear, consistent, and predictable regulation is essential for attracting private investment in carbon reduction and removal projects. As we've seen in other asset classes, investors will be drawn to those jurisdictions that have done the groundwork to create legal certainty in the carbon market.

This is why **we invite governments in the region to consider the recommendations outlined in this document, so that the private sector feels confident making the necessary investments in Latin America to drive carbon markets and climate action**.



ENDNOTES

[1] Mexican states are: Ciudad de México, Colima, Durango, Estado de México, Guanajuato, Jalisco, Morelos, Querétaro, Tamaulipas, Yucatán, Zacatecas.

[2] Brazilian states are: Acre, Amapá, Maranhão, Mato Grosso, Pará, and Tocantins.

[3] Argentinian provinces are: Córdoba, Formosa, Jujuy, Misiones, Neuquén, and Santa Fe.

[4] IMF. 2024. Climate Change Challenges in Latin America and the Caribbean. Available here.

[5] MSCI. 2023. Latin America & the Caribbean – An important global player of carbon credits [PowerPoint slides].

[6] MSCI. 2025. Data and analytics carbon markets.

[7] MSCI. 2024. Investment trends and outcomes in the global carbon credit market – 2024. Available here.

[8] IETA. A6IP. 2024. Article 6 in action: Business insights & implementation trends. Available here.

[9] To get more information on Carbon Pricing in the Americas, visit the following link.

[10] To get more information on the Pacific Alliance MRV Sub-technical Group, visit the following link.

[11] To get more information on CADT, visit the following link.

[12] To get more information on PACM, visit the following link.

[13] To get more information on ICROA, visit the following link.

[14] To get more information on CORSIA, visit the following link.

[15] To get more information on ICVCM, visit the following link.

[16] IETA. 2025. Visualising Article 6 implementation. Available here..

[17] To get to know more, click on this link.

[18] IETA. 2025. Scaling up NDC 3.0 Ambition Through Article 6. Available here.

[19] To get to know more, click on this link.

[20] S&P Global. 2025. Unlocking the potential of carbon markets: Designing carbon registry for success. Available here.

[21] EcoRegistry. 2025. Tipos de registros, funcionalidades y requerimientos para el mercado de carbono.

[22] To get more information on the Carbon Markets Infrastructure Working Group, visit the following link.

[23] World Bank; Carbon Markets Infrastructure Working Group. 2025. Executive Summary: Technical Guidance for Safe, Efficient, and Interoperable Carbon Markets Infrastructure. Available here.

[24] To get more information on the International Registry, visit the following link.

[25] ISDA. 2024. Act now: The need for public-private sector collaboration on climate risk and carbon markets. Available here.

[26] World Bank. 2017. Designing dialogue for climate change: Six fundamental principles for catalyzing climate action through dialogue. Available here.

[27] World Bank. 2017.

[28] World Bank, ICAP. 2021. Emissions trading in practice: A Handbook on Design and Implementation. Available here.

[29] Comisión Económica para América Latina y el Caribe. (2025). Panorama Fiscal de América Latina y el Caribe, 2025. Available here.

[30] The following link shows how the institutional structure of the Colombian electricity sector is organized.

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