Chapter 8: A Postscript: A Review of Article 6 in the Context with Recent Developments in Zimbabwe Surrounding Carbon Trading

Through the chapter, I seek to critically examine Zimbabwe's engagement with Article 6 of the Paris Agreement, assessing whether its carbon trading reforms represent a transformative departure from past governance practices or a continuation of entrenched systems of control and exclusion. This analysis explores the intersection between global climate compliance, national policy recalibration, and local forest governance through the lens of justice, inclusion, and institutional accountability. The question of whether Zimbabwe's engagement with Article 6 of the Paris Agreement signals a meaningful shift or a strategic repackaging of historical governance modalities remains central to ongoing debates in climate policy. Article 6 operationalises international cooperation on climate mitigation by enabling countries to trade internationally transferred mitigation outcomes (ITMOs), with the aim of reducing the cost of meeting Nationally Determined Contributions (NDCs), while fostering sustainable development through finance, technology transfer, and institutional strengthening.

Prior to Article 6 establishment, Zimbabwe has been relying on both local and international funding for most of its climate mitigation strategies. Projects such as the Clean Development Mechanisms (CDM), Green Environment Facility (GEF), and other international development funds have been helping Zimbabwe cope with climate change issues. Most NGOs have also helped a number of mainly rural communities coming up with lively community projects. The private sector has not been left out having been instrumental in coming up with a new form of climate funding thus carbon credits generation. Zimbabwe entered the carbon credit arena in 2011 having established the Kariba REDD+ project

in four districts thus Mbire, Hurungwe, Nyaminyami and Binga. This was the pioneer project in the county to generate revenue from a carbon trading business with other projects such as solar, cookstove, etc following in the later years. This project was established from a purely Private sector Investment funding. The carbon credits have been traded on the Voluntary market.

Zimbabwe does not have any carbon trading project under Government so this means all current carbon trading projects are purely run by the private sector which has immensely covered the gap. Besides other similar entities running carbon projects, the Kariba REDD+ project has seemingly been more visible across the globe. The project covers over 750,000 ha of communal land that it protects in return generating carbon credits revenue for the marginalised communities. The Kariba REDD+ project in particular has been operational through the Government's decentralisation agenda where binding contractual agreements were signed between the private entity and Rural District Councils. The Rural District Councils are a Local Government structure which oversees communal areas management on behalf of communities in the respective jurisdictions. Authenticity and legitimacy of projects such as the Kariba REDD+ project hinges on the binding agreements in place with RDCs which is an arm of the Ministry of Local Government at the higher level. However the directive that all carbon projects should be registered with the MECW is very logical as it is the correct Ministry mandated with carbon accounting for the country.

For Zimbabwe to actively participate on the Article 6 Paris Agreement it need to have bankable projects running carbon credit projects in Zimbabwe to fulfil conditions of mainly Article 6:2 and 6:4. For the Government to start these projects it will take not less than 36 months before carbon credits generation on which Zimbabwe can now actively participate globally under the two sections of Article 6 mentioned above. Article 6 is being managed by the MECW yet the current carbon projects

have binding agreements with Ministry of Local Government though RDCs. To avoid this mismatch, the Government then directed that all Carbon trading projects should now be registered and be recognised by the MECW. The Ministry of Environment now had to come up with a series of ambitious institutional and regulatory reforms. These include the establishment of the Zimbabwe Carbon Registry (ZCR)—the first national registry globally to meet Article 6 compliance standards—the enactment of Statutory Instrument 48 of 2025, and the drafting of the Climate Change Management Bill. The ZCR is underpinned by blockchain architecture designed to automate core processes such as credit issuance, retirement, and corresponding adjustments.

Despite the apparent modernisation, the governance architecture of Zimbabwe's carbon reforms reflects contested power geometries. The design of the ZCR embeds a top-down governance ethos, where central authority over carbon asset ownership and compliance is retained by state institutions and elite intermediaries. This raises concerns about whether the shift to compliance markets constitutes an actual departure from exclusionary governance patterns or simply rearticulates them within new normative frameworks.

Since inception in 2011, the Kariba REDD+ project model was centred on community ownership. The project proposals were discussed first with local leadership and community members first before taken to the RDCs for MOU signatures. There was prior informed consent and full buy-in by the community before any project was undertaken. The project was signed by the RDCs standing on behalf of the communities as mandated by the RDC Act which falls under the Ministry of Local Government. Stock holders to the project have been the RDC, community, project developer and the project Investor. The share of revenue from carbon credit sales was clear from the onset despite the issue of values at which credits were sold for. The project was running under a project design document which enabled climate mitigation and adaption project activities to be implemented from credits revenue. The communities

have to identify which projects they need implemented within their respective wards and claim ownership of such. The project has cut across all SDGs thus ranging from drought mitigation, health, water, education, food, infrastructure etc. Projects are being implemented as per specific ward requirements. The model structure presents a bottom-up approach which brings a sense of inclusivity and total control by the communities who should be beneficiaries of the forests around them. Most carbon projects have failed to run for more than five years. However, the Kariba REDD+ project since 2011 has been running for the past 14 years which is a typical proof that communities are solidly behind the project.

Zimbabwe has joined the global market by participating on the Article 6 of the Paris Agreement which is a milestone achievement by the country. This has culminated in the crafting of the ZCR, ZiCMA, SI48/2025 among other regulations. This brings uniformity to the carbon trading industry in Zimbabwe which is shifting towards the compliance market as opposed to the voluntary market. This has brought both positive and negative results to the whole carbon market.

The study found that Zimbabwe's engagement with Article 6 reflects both opportunity and constraint. Therefore, the chapter interrogated Zimbabwe's carbon trading strategy through the lens of international compliance, market governance, and forest management. On one hand, the reforms create pathways for greater financial mobilisation, legal clarity, and institutional coordination. The question is whether the recent shift to compliance reflects substantive transformation or adaptive continuity. The analysis underscores the need to move beyond symbolic alignment with global frameworks and focus instead on embedding justice, participation, and accountability into carbon governance at all levels. Without a deliberate effort to centre local communities, Article 6 compliance risks becoming another episode in the reconfiguration of natural resource control.

The framing of compliance as innovation obscures the persistence of centralised control and the marginalisation of grassroots stakeholders. While reforms such as Statutory Instrument 48 of 2025 introduce legally binding obligations, the pace and form of implementation suggest a potential alignment with global climate finance narratives rather than a genuine effort to democratise environmental governance. The deployment of digital infrastructure and performative compliance with global norms appears oriented toward securing investment legitimacy and international credibility, rather than fundamentally reconfiguring decision-making power at the local level. This instrumental approach raises important questions about the real beneficiaries of Zimbabwe's carbon trading trajectory. While the reforms invoke the language of sustainable development and community benefit-sharing, the underlying institutional architecture remains tightly controlled, limiting meaningful participation from the communities whose forests generate carbon credits. The commodification of carbon through Article 6 compliance risks reproducing extractive relationships under the guise of environmental reform.

Zimbabwe's recent carbon governance reforms, anchored in the launch of the Zimbabwe Carbon Registry (ZCR), the enactment of Statutory Instrument 48 of 2025, and the drafting of the Climate Change Management Bill are framed as a decisive pivot toward Article 6 of the Paris Agreement. However, a closer interrogation reveals a more complex reality: one in which technical alignment coexists with institutional inertia, and where the language of compliance may mask deeper continuities in centralised governance. Article 6.2 enables countries to engage in cooperative mitigation through the transfer of Internationally Transferred Mitigation Outcomes (ITMOs), offering flexibility in achieving Nationally Determined Contributions (NDCs) (UNFCCC, 2021). Zimbabwe's Statutory Instrument 48 of 2025 operationalizes this mechanism by establishing procedures for ITMO approval, project registration, and corresponding adjustments (Government of Zimbabwe, 2025). The ZCR automates these

adjustments using blockchain, ostensibly enhancing transparency and auditability. Yet, the political economy of ITMO transfers in Zimbabwe reveals strategic adaptation rather than normative compliance. As noted by Omukuti *et al.* (2024), African states often engage with carbon markets through a logic of "regulatory mimicry," adopting international frameworks to attract finance while retaining centralised control. In Zimbabwe, ITMO governance remains opaque, with limited public disclosure of bilateral agreements and no formalized stakeholder consultation process (Zimbabwenow,2024). This suggests a compliance posture driven by transactional incentives rather than participatory transformation.

Article 6.4 establishes a centralised crediting mechanism under UNFCCC oversight, designed to replace the Clean Development Mechanism with stronger safeguards for environmental integrity and sustainable development (Kovacs *et al.,* 2025). Zimbabwe's registry mimics this architecture by embedding benefit-sharing obligations mandating that 20% of carbon revenues support local infrastructure, education, and healthcare (Bulawayo24, 2025). However, the institutional architecture remains vertically integrated, with decision-making authority concentrated in state agencies and technocratic bodies. Tembani *et al.* (2021) demonstrate that Zimbabwe's forest governance is characterized by weak actor networks and low capacity for collective action, conditions that persist despite regulatory reform. As noted by Jinga (2024) and reinforced by recent government interventions (ZBC News, 2025; Herald Online, 2025), Zimbabwe's carbon economy has historically privileged transnational consultants and elite brokers, often sidelining local communities through opaque land tenure systems, limited consultation, and uneven benefit-sharing mechanisms. The replication of this pattern under Article 6.4 raises questions about whether the centralised mechanism is being used to entrench existing hierarchies rather than democratize climate governance.

Article 6.8 promotes non-market approaches such as capacity building, technology transfer, and policy coordination, offering a counterbalance to market-centric climate governance (Global Forest Coalition, 2022). Zimbabwe's Climate Change Management Bill references Article 6.8 but provides no operational roadmap for implementing non-market pathways. The emphasis remains on tradable mitigation outcomes, with limited investment in institutional capacity or community-led adaptation. Zamchiya *et al*. (2021) caution that in contexts of contested land tenure and weak customary rights, market-based reforms may exacerbate exclusion and dispossession. As noted by Durmaz and Schroeder (2025), the global shift toward carbon commodification often sidelines justice-based approaches.

SI 48 of 2025 represents a paradigm shift in Zimbabwe's climate governance. By integrating blockchain technology, enforcing compliance, institutionalising benefit-sharing, and correcting past governance failures, Zimbabwe positions itself as a regional leader in carbon finance. However, the framework's success will depend on its operational fidelity, transparency, and ability to attract credible international partnerships. Zimbabwe's carbon trading reforms anchored in Statutory Instrument 48 of 2025, the launch of the Zimbabwe Carbon Registry (ZCR), and the drafting of the Climate Change Management Bill are often portrayed as a decisive shift toward Article 6 compliance. However, a deeper analysis reveals a hybrid governance model: legal and technical innovation layered atop enduring institutional structures.

The repeal of SI 150 of 2023 and enactment of SI 48 of 2025 marked a legal turning point. The new regulations established the Zimbabwe Carbon Markets Authority (ZiCMA) and the ZCR, both designed to ensure traceability, prevent double counting, and support Article 6 transparency frameworks (Panavanhu, 2025; Muvingi & Mugadza, 2025). The ZCR is blockchain-enabled and now serves as the sole platform for project registration, credit issuance, and retirement (Herald,

2025). ZiCMA's mandate includes licensing auditors, approving mitigation outcomes, and authorizing international transfers. These functions mirror global best practices and reflect Zimbabwe's ambition to become a credible player in the carbon economy (Makombe & Chanza, 2024). Yet, the centralisation of authority within ZiCMA also raises concerns about bureaucratic bottlenecks and limited checks on executive discretion (MCM Legal, 2025).

Despite regulatory upgrades, Zimbabwe's carbon governance remains vertically integrated. ZiCMA operates as the sole liaison with the UNFCCC, and grievance mechanisms, though formally established, lack operational independence (Bulawayo24, 2025; ESG Network Zimbabwe, 2025). The Climate Change Management Bill references Article 6.8 but offers no enforceable pathways for non-market approaches like community-led adaptation. Makombe and Chanza (2024) argue that Zimbabwe's climate diplomacy is often transactional, with weak institutional capacity undermining transformative potential. The replication of centralised control echoes past forest governance models, where elite brokerage marginalized local actors (Mashingaidze *et al.*, 2021).

Zimbabwe's carbon trading reforms reflect technical change layered atop institutional continuity. The transition from voluntary to compliance markets is legally significant, but centralised control, limited stakeholder agency, and transactional diplomacy temper claims of transformation. The result is a hybrid regime which is legally modernized, technologically sophisticated, but structurally conservative. As Makombe and Chanza (2024) and Hoffmann *et al.* (2025) warn, Article 6 may reproduce colonial logics of resource extraction if not accompanied by institutional reform. Zimbabwe has taken a bold step toward compliance, but the true measure of change will lie in its ability to transform governance structures, not just regulatory instruments. Continuity must give way to inclusion, and compliance must evolve into climate justice. It is expected that Zimbabwe's carbon trading regime

mature into a participatory, transparent, and regionally integrated system, one that not only meets Article 6 obligations but also uplifts communities, restores landscapes, and redefines Africa's role in global climate finance.

In Murehwa District, socio-ecological threats such as land fragmentation, invasive species, and unsustainable harvesting have eroded the climate mitigation potential of forests. Mataruse *et al.* (2021) argue that without integrated forest governance, carbon finance will remain vulnerable to ecological shocks and community resistance. The National Forestry Policy (2023) attempts to address these gaps by promoting sustainable forest management and community participation, but implementation remains uneven (Nyagumbo, 2023).

Taking a relook at the Kariba REDD+ project model, the revenue share points to where a greater percentage of the revenue proceeds is accounted for in the respective districts thus the producer community while the project proponent retains 30% only. There is greater control and direct participation by the communities. Similarly, the Eastern Highlands offer a promising model. Grassroots cooperatives like Chitsanza Development Association have begun certifying carbon sequestration and accessing payments, demonstrating that decentralised ownership can enhance both ecological and economic outcomes (Matonho, 2025). These initiatives suggest that community-driven approaches may succeed where top-down frameworks have faltered. If Zimbabwe's carbon trading business is fully regulated, inclusive, and ecologically grounded, the benefits could be transformative. Increased forest cover would enhance climate resilience, verified payments could incentivise sustainable land use, and transparent governance would attract global investment. As Matondi emphasised at the Africa Business Forum, Africa must use its carbon assets responsibly, not merely to

participate in global markets, but to redefine them in ways that prioritize ecological justice and community empowerment (Nyagumbo, 2025).

At a systemic level, Zimbabwe's approach to Article 6 compliance illustrates a broader tension between market efficiency and climate justice. The country has embraced the market-based instruments of Articles 6.2 and 6.4—ITMO trading and project-based mitigation—while neglecting the more justice-oriented Article 6.8, which promotes non-market cooperation, capacity building, and community-led adaptation. This skewed prioritisation reflects a transactional orientation that seeks legitimacy, investment, and diplomatic alignment with global climate norms, while leaving the underlying governance hierarchies intact.

The Climate Change Management Bill, despite its progressive rhetoric, lacks binding clauses on community consultation, benefit distribution, and grievance redress. It codifies compliance without decentralising authority. The continued exclusion of forest-dependent communities from decision-making and revenue flows reflects a policy posture driven by external validation and elite brokerage, rather than internal accountability or ecological justice. Zimbabwe's carbon reforms, therefore, constitute a hybrid model: legally codified, digitally sophisticated, and institutionally centralised. While the reforms offer a promising foundation for integrating climate finance into national development strategies, their transformational potential remains limited by longstanding governance constraints. Centralised control, exclusionary forest policies, weak enforcement, and technocratic bias continue to undercut community empowerment and ecological integrity.

To unlock the full potential of Article 6, Zimbabwe must move beyond compliance for its own sake. A recalibration is required—one that repositions communities as active participants rather than passive

beneficiaries, integrates biodiversity values into carbon methodologies, and embeds enforceable rights into legal instruments. Only through such structural transformation can carbon markets evolve from transactional platforms into engines of inclusive, justice-based climate governance.