

## **A6.4-SBM023-AA-A11**

### Information note

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Summary of stakeholder inputs received on  
the draft version 02.0 of Article 6.4  
Sustainable Development Tool

Version 01.0



**United Nations**  
Framework Convention on  
Climate Change

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## 1. Introduction

1. The Supervisory Body of the Article 6.4 mechanism, at its twenty-first meeting (SBM021), requested the secretariat to launch an additional call for input to the draft revised Article 6.4 Sustainable Development Tool (A6.4 SD tool) as per paragraph 19 (a) of the SBM 21 meeting report.<sup>1</sup> This information note provides a summary of the input submitted by stakeholders in response to the additional call for input.
2. The additional call for input was launched on 30 June 2026 with an initial time window of two weeks as per paragraph 19 of the SBM 21 meeting report, which was later extended to four weeks. The call for input was closed on 28 July 2026 with a total of 19 submissions received. The full list of submissions can be found on the UNFCCC website.<sup>2</sup>
3. As per paragraph 19(e) of the SBM 21 meeting report, the secretariat will present a revised SD tool by incorporating the inputs below at the first SBM meeting in 2027.

## 2. Summary of views on the draft Article 6.4 sustainable development tool version 02.0<sup>3</sup>

4. The following sections summarize the inputs expressed in the stakeholder submissions.

### 2.1. General

5. The inputs received from the additional call for input propose the A6.4 SD tool to include:
  - (a) A provision to apply a higher standard of protection in cases where national law is exclusionary or inconsistent with applicable international human rights law and internationally recognized human rights standards;
  - (b) An aggregate risk rating procedure, which is helpful for decision-making and communication about the activity, prevents underestimating cumulative impact, helps with portfolio level management and allows for activity level comparisons;
  - (c) Distinction between A6.4 activity with Official Development Assistance (ODA) funded interventions;
  - (d) Removal of avoidance of risk as all activities pose a risk;
  - (e) Clear reference and mandate compliant with key human rights and labour conventions and guidelines such as the International Labour Organization (ILO) Core Labor Conventions, ILO Guidelines for a just transition towards environmentally sustainable economies and societies for all, ILO Decent Work Agenda, and ILO's Declaration on Fundamental Principles and Rights at Work, along with its associated conventions and recommendations, thus creating binding obligations on member states and serving as the overarching legal baseline;

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<sup>1</sup> See <https://unfccc.int/sites/default/files/resource/A6.4-SBM021.pdf>.

<sup>2</sup> See <https://unfccc.int/process-and-meetings/the-paris-agreement/article-6/article-64-pacm/stakeholder-engagement/calls-for-input/sbm021-SD-tool>.

<sup>3</sup> See <https://unfccc.int/sites/default/files/resource/CFI-SBM021-SD-Tool-v02.0.pdf>.

- (f) Use of “shall” and “must” instead of “are to” and “is to”;
- (g) Access to effective, transparent and culturally appropriate grievance mechanisms by all affected stakeholders; and
- (h) Addition of “workers and their organization” and “Afro-descendant peoples” in the definition of “Stakeholders” and the definition of social dialogue.

## **2.2. Stakeholder engagement and the A6.4 SD tool**

6. Some inputs propose to:

- (a) Prepare a monitoring report, including monitoring data, and make it available to affected communities, providing data in local and plain non-technical language for a high-risk activity;
- (b) Define the length of at least three months for local stakeholder consultation and global stakeholder consultation;
- (c) Conduct local stakeholder consultations based on stakeholder mapping and a stakeholder engagement plan to ensure that all individuals, groups and communities affected by the activity are invited to participate in a safe and accessible manner;
- (d) Define the qualifications of the actor who will lead local stakeholder consultations;
- (e) Design timely, accessible, culturally appropriate, gender-responsive engagement in the languages and formats needed by affected stakeholders that allows freedom from coercion, intimidation and retaliation, and additional measures to reach marginalized and disadvantaged groups; and
- (f) Tailor the A6.4 SD tool forms to the stakeholder context, such as in local language and accessible formats.

## **2.3. Environmental and social risk assessment**

7. Some inputs proposed adding additional steps in the environmental social risk assessment that includes:

- (a) Environmental and social risk assessment undertaken by a qualified third party rather than an activity participant;
- (b) Identification and mapping of affected stakeholders and documentation of the human rights and community engagement track records of all activity participants prior to an environmental and social risk assessment;
- (c) Meaningful participation of affected communities in identifying and validating environmental and social risk assessments;
- (d) Creation of a category of “High-risk activity” that make independent technical or legal support available to affected individuals, groups or communities – including non-Indigenous communities with customary land relationships – to assist them in understanding their rights, the terms of any proposed agreement, and the long-term implications of the activity;

- (e) Revision of A6.4-FORM-AC-015 (A6.4 Environmental and social safeguards risk assessment form) to document participation of affected communities including how concerns raised were addressed in the risk assessment;
  - (f) Development of A6.4-FORM-AC-016 (A6.4 Environmental and social management plan form) in partnership with affected communities, recognizing and upholding their rights;
  - (g) Provision of examples of activity-level social indicators;
  - (h) Use of independent satellite Earth observation, remote-sensing or geospatial information for tracking forests, wetlands and land-cover change as a complementary source of monitoring evidence; and
  - (i) Clear use of the terms of risk identification and impact assessment, and further clarification of the description of the response of “Potentially”.
8. Further, some inputs indicate:
- (a) Obsolete distinction between environmental and social impacts and ambiguous term of “harm”; and
  - (b) The need to create a new safeguard element, i.e., benefit-sharing for Indigenous Peoples, Afro-descendant peoples and local communities, that requires a documented benefit-sharing agreement with transparent allocation criteria, governance arrangements and revenue disclosure and concluded through free, prior and informed consent (FPIC) for Indigenous Peoples and meaningful consultation with other marginalized communities.

## **2.4. Eleven elements**

9. This section provides summaries of the inputs to Elements defined in A6.4 SD tool.

### **2.4.1. Element 1: Energy**

10. Some inputs propose to include:
- (a) The definition of “sustainable use of energy” referred to in the description of the Element;
  - (b) Additional Guiding Question (AGQ) to assess the reliability of the activity's own energy output over the crediting period including the source of energy use.

### **2.4.2. Element 2: Air, land and water**

11. Some inputs propose to:
- (a) Revise Element Level Question (ELQ) 2.1 to include greenhouse gases and direct, indirect, or cumulative lifecycle processes, regional, transboundary, and/or global climate impacts with addition of relevant AGQ;
  - (b) Revise E2.3.1 to avoid activities that would significantly alter, fragment, degrade, or disrupt water-related ecosystems and require activity participants to maintain

environmental flows sufficient to sustain the geomorphological, ecological, water-quality, and connectivity functions of the affected river;

- (c) Include new criteria to conduct an additional assessment of where proposed activities would significantly disrupt water resources or water-related ecosystems including impacts on longitudinal river connectivity and on upstream and downstream fish passage and migration.

### **2.4.3. Element 3: Ecology and natural resources**

12. Some inputs propose to include:

- (a) Further elaboration of “precautionary approach” in E3.1.1;
- (b) AGQ for direct, indirect, or cumulative activity-related greenhouse gas emissions associated with construction, land-use and land-cover change, operation, maintenance, decommissioning, or activity-related impacts on ecosystems and natural resources;
- (c) Introduction of a review of affected critical habitats by an independent biological expert; and
- (d) Addition of criteria related to “endangered species” in E3.3.1.

### **2.4.4. Element 4: Human rights**

13. Some inputs propose to include:

- (a) Regular update of human rights due diligence during implementation and again prior to each verification, rather than being a single upfront assessment;
- (b) International instruments that enshrine human rights and the Universal Declaration of Human Rights in E4.1 and E4.2;
- (c) A new criterion under Element 4 requiring activity participants to adopt, implement, and publicly disclose a zero-tolerance policy against retaliation targeting anyone exercising their rights in connection with the activity; and
- (d) Further revision of additional guiding questions under Element 4.

### **2.4.5. Element 5: Labour**

14. Some inputs propose to include:

- (a) Revision of description of Element 5 by including compliance with national labour and occupational health and safety laws, with obligations under international law, and with the principles and ILO Core Labour Standards embodied in the ILO’s fundamental conventions”;
- (b) Additional element criteria to disclose employment terms, including that remuneration from project-generated employment is sufficient to maintain, at a minimum, the standard of living workers enjoyed prior to the implementation of project activity where existing livelihoods are displaced and to strengthen protections against discrimination, promote equal opportunities, and advance gender equality in the workplace;

- (c) Reference of ILO Minimum Age Convention (No. 138) and the ILO Worst Forms of Child Labour Convention (No. 182) and young workers in E5.3;
- (d) Connection between E5.6 and grievance mechanisms defined in guiding principles on business and human rights;
- (e) Full operationalization of ILO Core Conventions and alignment with the Just Transition Work Programme's emphasis on social dialogue, labour rights, and decent work;
- (f) Prioritization of employment and training opportunities to women, youth, Indigenous Peoples, and persons with disabilities in E5.1;
- (g) Revision of "the freedom of association for Article 6.4 activity workers and their right to collective bargaining" to address "intimidation, discrimination or retaliation for exercising freedom of association" in E5.5;
- (h) Provision of regular occupational health and safety training, along with emergency preparedness exercises in E5.7;
- (i) Inclusion of "without fear of retaliation" in E5.6; and
- (j) Addition of the statement that the right to work is essential for realizing human right and an inseparable part of human dignity.

#### **2.4.6. Element 6: Health and safety**

15. Some inputs propose to include:

- (a) AGQ to add a reference to post-conflict areas and law enforcement rangers in community safety;
- (b) Community participation to develop emergency preparedness and response plans in E6.2;
- (c) Prioritization of integrated pest management and safer alternatives to chemical pesticide application in E6.4;
- (d) New AGQs to identify any impact on bioaccumulating contaminants in the food chain and to prepare a funded decommissioning or closure plan if the A6.4 activity leave infrastructure; and
- (e) Revision of AGQ6.1-4 to provide further guidance on the answer is either "Yes" or "Potentially".

#### **2.4.7. Element 7: Gender equality**

16. Some inputs propose to:

- (a) Expand the scope of Element 7 to include a proportionate gender and social inclusion analysis (with sex/age/disability-disaggregated indicators), meaningful participation of women and girls, gender-based violence prevention measures, and gender-responsive grievance and benefit-sharing arrangements;

- (b) Introduce preventive measures by reporting gender-disaggregated data across all relevant activity-level SD indicators and environmental and social indicators;
- (c) Include the prohibition of gender-based violence and harassment in E7.1 and monitoring of gender equality in E7.2;
- (d) Include measures and operational examples based on the Belém Gender Action Plan as an annex guideline to the A6.4 SD tool; and
- (e) Strengthen Element 7 to actively promote gender equality as per the Convention on the Elimination of All Forms of Discrimination against Women by creating additional element criteria.

#### **2.4.8. Element 8: Land acquisition and involuntary resettlement**

17. Some inputs propose to:

- (a) Change the title of the element to “Involuntary resettlement and economic displacement” by modifying E8 description, clarifying involuntary resettlement and revising the element criteria;
- (b) Completely avoid forced physical or economic displacement or involuntary resettlement and allow voluntary resettlement by replacing involuntary resettlement with voluntary resettlement in E8.1, physical displacement with voluntary physical displacement in E8.2, and economic displacement with voluntary economic displacement in E8.3;
- (c) Extend FPIC to local communities, other customary rights holders and Afro-descendant peoples who are recognized at the same level of vulnerability as Indigenous Peoples;
- (d) Allow displacement only after the consideration of all feasible alternatives with carefully planned measures for adverse impacts on displaced persons and host communities through meaningful consultation with affected communities and economic displacement only when full and fair compensation and implementation of appropriate livelihood restoration measures are in place to ensure that affected persons and communities are, at a minimum, restored to their pre-project livelihoods and living standards by providing clarification of the meaning of “assets” and “access to assets”;
- (e) Undertake meaningful consultation that is timely, inclusive, culturally appropriate, and conducted in good faith; provides relevant assessable information sufficiently in advance of decision-making; enables effective participation through representative institutions and local protocols where available; takes community views into account in decision-making; and is documented throughout the process, including how concerns were addressed and any agreements reached if physical displacement affects local and Afro-descendant communities with customary and/or statutory rights to land;
- (f) Include meaningful consultation prior to any land acquisition or land-use restriction in E8.1 and completion of compensation and livelihood restoration before physical or economic displacement in E8.2;

- (g) Revise element criteria to include a process framework, that contains a detailed description of the means for a good-faith negotiation with affected peoples, and to prepare the negotiated agreement on restoration of access to resources and/or resettlement;
- (h) Include continuous monitoring of livelihood restoration in E8.4;
- (i) Create a new element of “recognition of tenure rights” that require activity participants to recognize and respect all legitimate land and resource tenure rights including statutory, customary, collective, and informal tenure rights and conduct meaningful consultation with all affected rights holders as per customary laws, traditional governance systems, and other legitimate forms of tenure (which will require the revision of A6.4-FORM-AC-015);
- (j) Include criteria to assess direct, indirect, cumulative, and downstream physical and economic displacement caused by reservoir inundation, water-level change, and altered flow regimes;
- (k) Further elaborate the socioeconomic baseline survey in E8.4 and provide additional guiding questions based on E8.2 and E8.4; and
- (l) Require activity participants to provide independent technical or legal support available to affected individuals, groups or communities to assist them in understanding their rights, the terms of any proposed agreement, and the long-term implications of the activity.

#### 2.4.9. Element 9: Indigenous Peoples

18. Some inputs propose to:

- (a) Revise the title of Element 9 to Indigenous Peoples and local communities by including other affected local communities in each element criteria;
- (b) Include the definition of "Indigenous Peoples" based on Martínez Cobo Study;<sup>4</sup>
- (c) Expand FPIC to Indigenous Peoples with customary land and resource rights, local communities, Afro-descendant peoples, and other customary rights holders;
- (d) Further elaborate (i) FPIC by defining its minimum requirements, (ii) benefit sharing and benefit-sharing process, including reference to best-practice guidance, in E9.6 and, (iii) “special value to the community” and “good-faith negotiation” in E9.5;
- (e) Clarify “resources” referred in E9.4 and include the relationship between natural resources, carbon and carbon credits;
- (f) Include new element criteria to define the content of good-faith negotiations, such as nature, value and expected scope of monetary and non-monetary benefits, eligible beneficiaries, arrangement/schedule for the allocation and delivery of benefits, and a grievance and dispute resolution mechanism;

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<sup>4</sup> See <https://www.un.org/development/desa/indigenouspeoples/publications/2014/09/martinez-cobo-study/>.

- (g) Expand the Article 6.4 activity boundary defined in E9.1 to Indigenous Peoples and local communities within and outside of the Article 6.4 activity boundary that may be affected by the Article 6.4 activity;
- (h) Identify Indigenous Peoples in collaboration with their representative institutions in E9.1;
- (i) Revise AGQ 9.2-2 to include the affected lands, waters, resources, or territories are traditionally owned, occupied, used, claimed, or otherwise acquired and Indigenous Peoples located outside the formally defined activity boundary;
- (j) Revise AGQ 9.4 to include the use of rivers, water flows, reservoirs, fisheries, forests, ecosystem services;
- (k) Revise AGQ9.6-1 to demonstrate participation, consultation, and FPIC throughout the Article 6.4 activity lifecycle and include Indigenous Peoples who are not recognized by the host Party; and
- (l) Include an independent verification of FPIC in E9.3 and the use of traditional knowledge with consent and appropriate benefit-sharing arrangement in E9.6.

#### **2.4.10. Element 10: Corruption**

19. One input proposes to create criteria requiring disclosure of beneficial ownership disclosure, conflict-of-interest management, transparent procurement, traceable carbon-credit ownership, revenue/payment transparency, fraud/bribery/money-laundering controls, independent financial records, whistleblower protections, and clear disclosure of how community benefit payments are calculated and distributed.

#### **2.4.11. Element 11: Cultural heritage**

20. Some inputs propose to:
  - (a) Revise the description of Element 11 and element criteria by providing a definition of cultural heritage that includes tangible and intangible cultural heritage, cultural landscapes, sacred sites, customary practices, traditional knowledge, and other places or elements of cultural significance as identified by affected Indigenous Peoples and other affected local communities;
  - (b) Include “local communities and Indigenous Peoples” along with professionals and/or entities recognized by the host government, academia and/or the United Nations Educational, Scientific and Cultural Organization for conducting the assessment defined in E11.2;
  - (c) Expand the scope of E11.3 by including Indigenous Peoples and communities with customary rights; and
  - (d) Include a definition of cultural heritage and AGQ to assess impacts on tangible and intangible cultural heritage.

## **2.5. Demonstrating positive and negative SD impacts**

21. Some inputs propose to include:

- (a) Examples table for agriculture, forestry and other land use (AFOLU) activity in Table 6–9;
- (b) Mandatory SD indicators for each methodology; and
- (c) Replacement of the term “impacts” with “trends”.

## **2.6. Validation and verification**

22. Some inputs propose to:

- (a) Require the Supervisory Body to publish a standardized validation/verification checklist for the 11 safeguard elements that is completed by the designated operational entity (DOE);
- (b) Require the DOE to conduct and validate its own assessment of human rights and legal compliance, community consultation track record, and stakeholder mapping;
- (c) Make validation report publicly available;
- (d) Include at least one member who has demonstrated expertise in safeguard elements affected by proposed activity;
- (e) Provide detailed instructions for DOEs on how to conduct interviews and include new steps for the review of independent written sources against safeguard elements and interviews with independent experts such as local and regional NGOs, international human rights organizations, and research institutions working in the region during validation/verification;
- (f) Revise the contractual relationship between the DOE and the activity participant (to be hired by an independent body of the Paris Agreement Crediting Mechanism);
- (g) Remove a deviation request to the Supervisory Body prior to submitting a request for registration and provide clear justification when unavoidable negative impacts cannot be remediated by consultation or mitigation;
- (h) Require DOEs to independently verify the environmental and social risk assessment through confidential engagement with affected communities and consider documented stakeholder consultation and grievance outcomes;
- (i) Develop a standardized validation and verification checklist for 11 safeguard elements with specific instructions on how to validate Element 4 and Element 8; and
- (j) Suspend the validation and verification process until the implementation of appropriate corrective measures when there are credible allegations of retaliation.

## **2.7. Appendix 2. Specific requirements for carbon removal activities with technology readiness level (TRL) eight or higher**

23. Some inputs propose to:

- (a) Introduce a long-term monitoring, reporting and contingency plan to identify, manage and remedy any carbon reversals throughout the crediting period and any required post-crediting monitoring period; and
- (b) Include Element 4 and Element 7 in identification of risk and potential negative impacts.

## Appendix. List of submitters during the call for input

1. The following table contains the list of submissions in response to the call for input launched between 30 June and 28 July 2026.

**Table. List of submissions**

| Reference # | Stakeholder                                                                                                                                    | Submission date |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| 1           | African Group of Negotiators Experts Support (AGNES)                                                                                           | 28 July 2026    |
| 2           | Alliance of Bioversity International and CIAT/CGIAR                                                                                            | 28 July 2026    |
| 3           | Berkeley Carbon Trading Project, University of California, Berkeley                                                                            | 28 July 2026    |
| 4           | Carbon Market Watch                                                                                                                            | 28 July 2026    |
| 5           | Civil society organization                                                                                                                     | 17 July 2026    |
| 6           | Conservation International                                                                                                                     | 24 July 2026    |
| 7           | Global Green Growth Institute                                                                                                                  | 28 July 2026    |
| 8           | Independent consultant — Senior Safeguards Consultant, Adaptation Fund / Art. 6.4 Expert Reviewer (individual submission, not an organization) | 28 July 2026    |
| 9           | INSEC-OPAN                                                                                                                                     | 23 July 2026    |
| 10          | Solidarity Center                                                                                                                              | 28 July 2026    |
| 11          | Space Renaissance International (SRI)                                                                                                          | 26 July 2026    |
| 12          | The Grassroots Justice Network & Namati                                                                                                        | 28 July 2026    |
| 13          | The Grassroots Justice Network and Namati (Additional submission)                                                                              | 28 July 2026    |
| 14          | The Waterkeeper Alliance                                                                                                                       | 27 July 2026    |
| 15          | University of California Berkeley and University of California Irvine                                                                          | 28 July 2026    |
| 16          | University of Twente                                                                                                                           | 28 July 2026    |
| 17          | Wildlife Works PBC                                                                                                                             | 21 July 2026    |
| 18          | Women and Gender Constituency                                                                                                                  | 28 July 2026    |
| 19          | YOUNGO Finance and Market Working Group                                                                                                        | 28 July 2026    |

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### Document information

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