



Supervisory Body Art. 6.4
UN Climate Change Secretariate
UNFCCC

Lucerne , 25th October 2022

Public comment on agenda item 3 of the 3rd meeting of the Article 6.4 Supervisory Body 3-5 November 2022.

Continuous engagement and grievance mechanism at project level.

Dear Sir or Madame

As per communication shared on the 28th of September regarding the 3rd meeting of the Article 6.4 Supervisory Body, the public is invited to share comments on issues included in the annotated agenda.

Fastenaktion / Swiss Lenten Fund is happy to follow this invitation. In its 60 years of activity, Fastenaktion has acquired a longstanding experience in development work and currently implements projects in 14 countries, including a Gold Standard certified project. The right to food and climate justice are at the heart of our work.

Encouraging broad participation

Concretely, we would like to comment **Agenda Item 3** “Matters relating to rules, modalities and procedures for the Article 6.4 mechanism”. The “draft requirements for the development and assessment of mechanism methodologies and related information note, prepared by the informal working group on methodologies, as contained in annex 5 introduces in section 2.4. measures aiming at **“encouraging broad participation”**”.

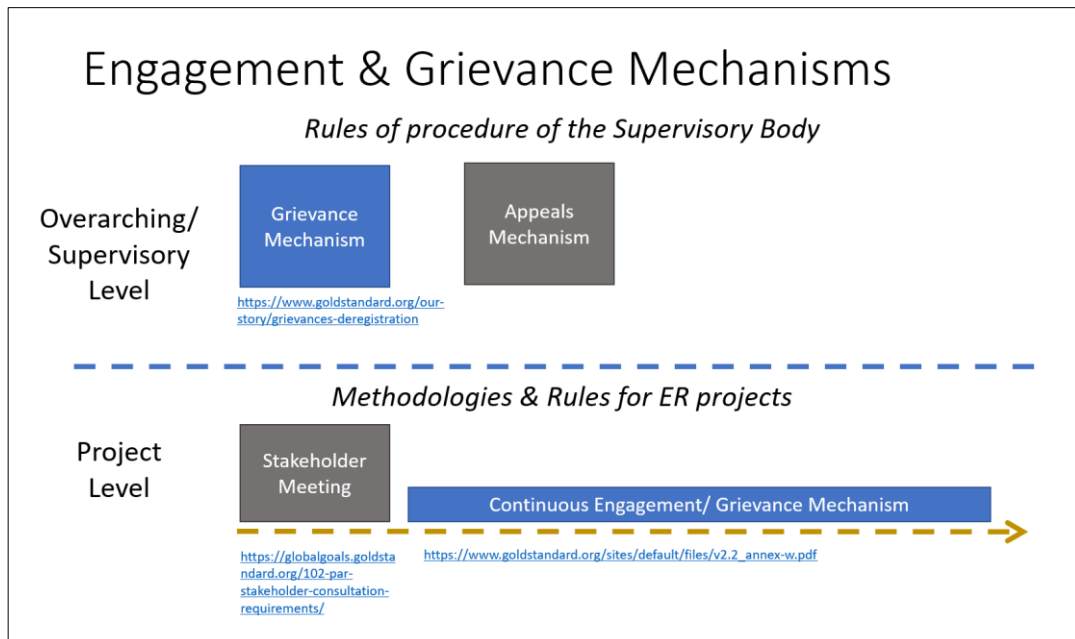
We welcome that section 2.4. paragraph 20 (b) requires carrying out an **inclusive stakeholder consultation process**. However, it is not clear whether this consultation process only refers to the approval of methodologies themselves or equally to the individual mitigation activities carried out under said methodology. In our experience, **it is essential that an inclusive stakeholder consultation is carried out by project developers at initiation of activity in each project area**. If carried out well, this is a very valuable exercise that allows project developers to connect with stakeholders on the ground and helps ensuring that a project is in line with local needs and priorities.

Apart of stakeholder consultation meetings, especially **continuous engagement mechanisms** are of high relevance to make possible involvement of (local) stakeholders. Therefore, **we welcome** that section 2.4. paragraph 20 (d) asks to establishment of **continuous communication channels, but would suggest stronger wording**. We would like to contribute with the following reflection:

Continuous Engagement & Grievance Mechanism

As brought forward in Decision3/CMA.3 Art. 62, a mechanism for appealing decisions of the Supervisory Body or addressing a grievance is to be developed.

We would like to emphasize that such an **engagement and grievance mechanism is best implemented at project and supervisory level (see blue boxes below):**



Why the need for two distinct engagement & grievance mechanisms ?

Project level mechanism

- While the stakeholder consultation allows an initial engagement of stakeholders and project developers, it is important that a **standardized channel** exists that allows (local) stakeholders to engage with the project implementers and to address questions and concerns.
- It is important that this channel is accessible in a locally adapted manner and manageable for the project developers (e.g. depending on the local context a query-book, whatsapp channel, email address etc. might be best suited).
- **Example:** https://www.goldstandard.org/sites/default/files/v2.2_annex-w.pdf

Supervisory level mechanism

- Some queries cannot be solved to satisfaction at project level or go beyond a single project. For such queries a grievance mechanism at supervisory level is required
- **Example:** <https://www.goldstandard.org/our-story/grievances-deregistration>

Advantages:

- The project level engagement mechanism has a lower barrier, allowing more stakeholder, especially local stakeholders, to engage with the project.
- The project level mechanism allows to solve many questions and queries on a low-threshold level without engaging the supervisory body.
- In consequence, the mechanism at supervisory level has to deal only with more substantial cases and workload at this level is reduced.

Recommendation “Encouraging Broad Participation”

Based on the above reflection, we would like to invite you to;

- rephrase section 2.4. paragraph 20 (b) so that the **inclusive stakeholder consultation** also explicitly refers to mitigation activities carried out under Article 6.4,
- rephrase section 2.4. paragraph 20 (d) so that it **not only “encourages”, but ensures** that methodologies developed for Article 6.4. activities include a **project-level engagement & grievance mechanism**.

In our understanding, this would ensure that all emission reduction activities under Article 6.4 include as per methodological requirement a sound framework for stakeholder engagement throughout activity implementation.

Complementary to the project level mechanism, a supervisory level grievance mechanism, as well as an appeal mechanism would need be established in due time.

We thank you for the consideration of our reflection and recommendation. We are looking forward to following the discussion on this matter and remain at your disposal for any question.

Sincerely,

David Knecht
Program Energy & Climate Justice
Fastenaktion / Swiss Lenten Fund
knecht@fastenaktion.ch