



Supervisory Body Art. 6.4
UN Climate Change Secretariate
UNFCCC

Lucerne , 25th May 2023

Public comment on agenda item 2.3 of the 5th meeting of the Article 6.4 Supervisory Body 31 May to 3 June 2023.

Local and global stakeholder consultation.

Dear Sir or Madame

As per publication shared on the Supervisory Body Webpage regarding the 5th 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.

Local and global stakeholder consultation

Concretely, we would like to comment Agenda Item 2.3 “Matters relating to the Article 6.4 mechanism” and specifically on the draft “Procedure: Article 6.4 mechanism activity cycle procedure for projects”, as contained in annex 3. This document details in paragraph 22 and 84 the mechanism for the global stakeholder consultation.

We welcome that the Art. 6.4 foresees a global stakeholder consultation process in addition to a local stakeholder consultation process, which, in our understanding the Supervisory Body will develop in the activity standard for projects (AS-P), in a subsequent step. We are convinced that the local and global stakeholder are important complementary mechanisms, which have to be thought together.

The **local stakeholder consultation** allows to present the project to relevant groups and actors in the local communities and region and therefore provides an important interface for interaction with stakeholders. The activity proponent can take the received comments and inputs into account in the final review of the project design. The framework of the local stakeholder consultation will be developed as part of the AS-P in a way that it builds on top of relevant national prerogatives regarding consultation.

The **global stakeholder consultation** on the other hand allows all stakeholders, including admitted UNFCCC observers to submit comment on a specific project with respect to the Art.6.4 regulations. This is an important step as international stakeholder might share important insights to the activity proponents drawing from their experiences with activities across the globe.

As detailed in annex 3, draft “Procedure: Article 6.4 mechanism activity cycle procedure for projects”, paragraph 22, the global stakeholder consultation is initiated **after the DOE completed validation and the activity proponent has submitted the registration request**. Paragraph 22 further explains that this allows global stakeholders to gain better insight as this way the PDD and validation report are available for consideration.

While we applaud the possibility for better insight, **we feel that the stage for the global stakeholder consultation comes late in the activity cycle.**

Sequencing of global stakeholder consultation

We see the following risks when planning global stakeholder consultation after the activity proponent has submitted the registration process:

- **Missed opportunity to improve:** This sequencing of steps does not allow the activity proponent to take into account important and interesting observations and adjust the PDD accordingly as the PDD at this stage has already been validated by the DOE. This is a missed opportunity for the activity proponent.
- **Work load for supervisory body:** The supervisory body risks to receive a substantive amounts of comments for its consideration when reviewing the activity registration request (par. 22, 85 and 89). This might result in a substantial workload for the supervisory body.
- **High barrier to adjust:** Since comments of global stakeholders are only received at such late stage in the validation process, the barrier is quite high to send an activity proponent back to the drawing board in order to adjust its project design. This might lead that more easily justified, but not major comments are discarded.

As we see the advantage of the suggested sequencing with a global stakeholder consultation taking place after the request for registration is made public on the UNFCCC webportal (par 22, 83, 84), we would suggest the following to mitigate the above listed risks:

Recommendation

Option 1

We would like to invite the Supervisory Body that, in its drafting of the “local stakeholder consultation” as part of the AS-P, it ensures that:

- a) As part of the local stakeholder invitation send out, the invitation to participate in the local stakeholder consultation is also **made public on the dedicated UNFCCC webportal**.¹
- b) The local stakeholder consultation contains a **feedback round**, where also international stakeholders can share recommendations and comments with the activity proponent.²

We are convinced that these measures would help to mitigate the above mentioned risks as it allows to have a low-level engagement of international stakeholder with activity proponents prior to completion of the validation process.

¹ This is along the spirit of the GoldStandard procedures for local stakeholder consultations, where activity proponents also invite “relevant international Gold Standard NGO Supporters”, 3.3.1.g. page 7: <https://globalgoals.goldstandard.org/102-par-stakeholder-consultation-requirements/>

² The feedback round complements the physical meeting. This can be along the lines suggested by GoldStandard (3.6.b) page 9: <https://globalgoals.goldstandard.org/102-par-stakeholder-consultation-requirements/>

Option 2

On the other hand, if this is not possible, we would invite the Supervisory Body to **reconsider the sequencing** of steps in annex 3, draft “Procedure: Article 6.4 mechanism activity cycle procedure for projects” and **ensure that the global stakeholder consultation takes place before completion of the validation process** in order to alleviate above mentioned risks.

Sincerely,

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