



Supervisory Body Art. 6.4  
UN Climate Change Secretariate  
UNFCCC

Lucerne, 3rd July 2023

## **Public comment on agenda item 2.3 of the 6<sup>th</sup> meeting of the Article 6.4 Supervisory Body 10 to 13 July 2023.**

### **Continuous engagement mechanism, local & global stakeholder consultation.**

Dear Sir or Madame

As per publication shared on the Supervisory Body Webpage regarding the 6th 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.

Concretely, we would like to comment Agenda Item 2.3 “Matters relating to the Article 6.4 mechanism” and specifically on the draft “Draft standard: Article 6.4 mechanism activity standard for projects” (annex 4) and “Draft procedure: Article 6.4 mechanism activity cycle procedure for projects” (annex 3).

#### **A) Continuous engagement mechanism**

We welcome that the “Draft procedure: Article 6.4 mechanism activity cycle procedure for projects” (annex 3) now explicitly links to the grievance mechanism (Section 12, par. 225).

From our experience as an activity proponent implementing carbon projects, we understand that a grievance mechanism has to be complemented by a “continuous engagement project”. Such a mechanism is complementary to a high-level grievance mechanism, as illustrated below.

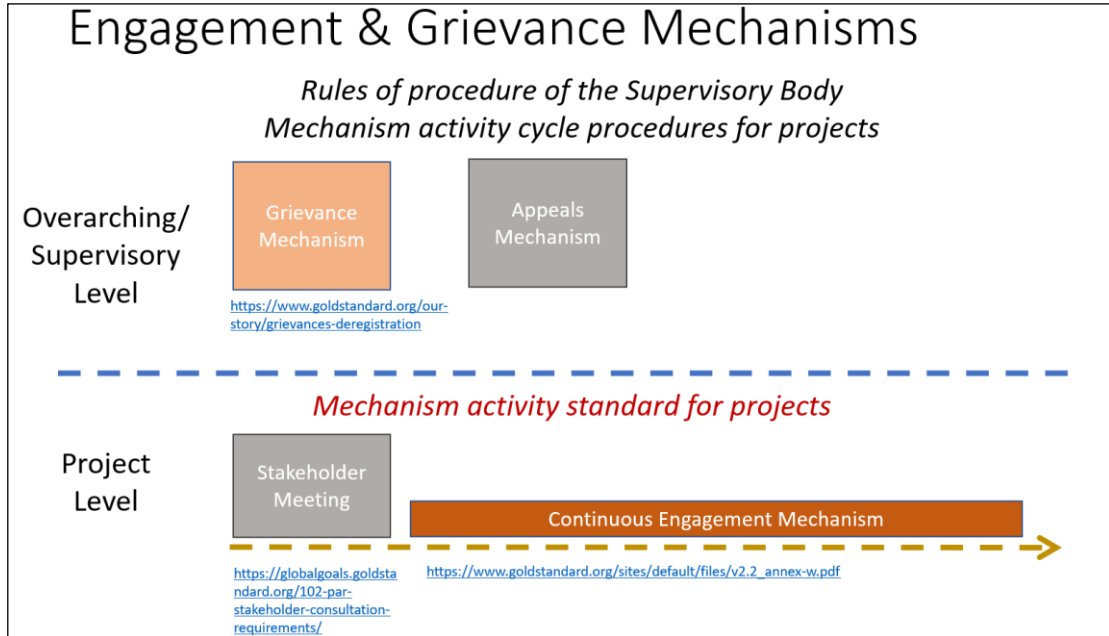
#### **Why the need for two distinct engagement & grievance mechanisms ?**

##### **Project level continuous engagement 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](https://www.goldstandard.org/sites/default/files/v2.2_annex-w.pdf)

### Supervisory Body level grievance 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, sub-chapter on "Continuous engagement mechanism"

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

- Introduce explicitly a "continuous engagement mechanism" as part of the activity standard
- And thus add a new subchapter 6.9. with the title "Continuous engagement mechanism"
- Describe in that sub-chapter briefly the task for project proponents to install a "continuous engagement mechanism"

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

## **B) Local stakeholder consultation**

We welcome that the “Draft procedure: Article 6.4 mechanism activity cycle procedure for projects” (annex 3) clearly lays out the minimum requirements for the local stakeholder consultation. We would like to share the following considerations regarding the local stakeholder consultation:

### **Appendix 2: Modalities of local stakeholder consultation,**

We welcome that stakeholder of potential positive and negative impacts shall be invited to participate (par 1.). We welcome that a definition of minimum representatives to be invited is provided (par. 2). We would like to bring to attention that it is important to consider that “directly impacted by the proposed A6.4 project” also must include stakeholders that are potentially not “legally impacted” (e.g. it is not their land a project operates on), but that are impacted by the consequences of the project. For example, communities living upstream a hydro plant activity, which causes changing fish-migration patterns. We recommend that this consideration is made more explicit in the definition in par. 2 of Appendix 2.

### **Section 6.8. Local Stakeholder consultation**

In par. 60, it is described that projects have to apply Party rules and if no such exist or the existing ones are not applicable to the proposed activity, then the modalities of Appendix 2 apply. We understand the logic of giving priority to Party rules. On the other hand, we are aware of renewable energy projects, where, even though the project applied Party rules, impacted stakeholders were not considered in the project design, causing considerable harm.

Recommendation: For this reason, we recommend to add the following sentence at the end of par.60: *In any case, the representatives of local stakeholders directly impacted by the proposed A6.4 project, including local communities and indigenous peoples as applicable, and representatives of local authorities relevant to the project shall be consulted.*

Advantage: This way, the application of Party rules is guaranteed and complemented in a good manner ensuring minimal stakeholder participation.

## **C) Global stakeholder consultation**

We **welcome the new option 1** for “global stakeholder consultation” in the “Draft procedure: Article 6.4 mechanism activity cycle procedure for projects” (annex 3, section 4.3, par 14 – 15). As written in the same document, this option 1 allows “*the activity participants and the DOE to take into account the comments from global stakeholders before the submission of a registration request to the secretariat*”.

From this, we see the following advantages:

- **Opportunity to improve:** This sequencing of steps allows the activity proponent to take into account important and interesting observations and adjust the PDD accordingly.
- **Reduced work load for supervisory body:** The supervisory body might receive less grievance requests, or comments (Option 2) as issues are already addressed, reducing its workload.
- **Lower barrier to adjust:** Since comments of global stakeholders are received in time to incorporate them in the PDD, the barrier to adjust is lower, increasing the quality of projects.

We thank you for considering our comments and are available for any questions.

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