Call for public input – Template for input	Draft: Article 6.4 sustainable development tool (ver. 02.0)
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Name of submitter: Steve Suppan	Legend for Columns 1 = Section Number in the document or Appendix 2= Paragraph, table or figure number
Affiliated organization of the submitter (if any): Institute for Agriculture and Trade Policy Contact email of submitter: ssuppan@iatp.org	 3 = Nature of input is general, technical or editorial 4 = Comment – the actual feedback or observation, including justification for what needs changing 5 = Proposed change – suggest the text if possible 6 = Assessment of comment – secretariat to document response/action taken to comment
Date: November 30,	

1	2	3	4	5	6
Section	Para.,	Type of input	Comment	Proposed change	Assessment of comment
no.	table or figure no.	G = general T = technical E = editorial		(Include proposed text)	(Completed by secretariat)
2	2	E	The realization of climate related SDGs requires not just monitoring of potential negative impacts but remediation of them.	participants to assess, demonstrate, monitor <u>and remediate</u> potential negative environmental and social impacts	
2	4a	E	Parties should not be left to interpret what "adverse environmental and social impacts" means. Without specification, paragraph 2 and much of SDT remain vague to the point of inapplicability	adverse environmental and social impacts (either define each category of impacts in a paragraph 4a.1 and 2 or do so illustratively in a footnote or do so in section 4)	
2	6b	E	Because the application of the SDT is intended to retrofit and legitimize CDM activities, the SDT should be applied retroactively to CDM activities	sustainable development contribution of <u>CDM activities and</u> proposed activities;	
2	6e (proposed)	E	The SDT should include a reporting requirement so that the AB can assess whether Parties are effectively applying the SDT to achieve their SDGs	e) a reporting protocol to enable the SB to assist Parties in effectively applying SDT requirements	
4		E	This section of definitions would be appropriate for inclusion of the aforementioned definitions for "adverse environmental and social impacts"	Separate definitions for "adverse environmental impacts" and "adverse social impacts"	
4	9b	E	Per the proposed reporting requirement in 6e	"as defined <u>and reported to the SB</u> by a host party"	

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4	9c	E	The definition of "Activity-level environmental and social indicators" is illustrated only with reference to land- based removal activities. The definition should be expanded to include engineering-based removals, e.g., to cover environmental impacts from BECCs and social impacts from forced sale of land for CCS pipeline projects	The SB should develop a more comprehensive definition of "activity-level environmental and social indicators" as indicated in our comment.	
4	9d	E	Per the proposed reporting requirement in 6e	"objectives or indicators defined by the host countries and reported to the SB"	
4	9e	E	The purpose of the "Environmental and Social Management Plan" should be first and foremost to prevent adverse impacts and to diminish the impact when elimination after the fact is no longer possible.	Delete "unintended" and the corresponding footnote " <u>prevent, diminish or</u> eliminate adverse"	
4	9k	E	Because the activity participant is attesting to the consistency of its project with host country regulations, the purpose of such attestation is necessarily includes compliance purposes.	"for transparency <u>and compliance</u> purposes"	
5	11	E	The legitimacy of Free, Prior and Informed Consent depends greatly on the advanced notice of "Prior" and the language of "Informed." Hence our proposed edits.	"shall be published and distributed in the language/s of the community/ies impacted by the removal activity two weeks in advance of and also shared at the local stakeholder consultation.	
5	13	E	Communication about "potential adverse environmental and social impacts" must include communities affected by the proposed removal activities to be effective.	"the process for activity participants <u>and</u> for communities affected by the activity"	
5	13a	G	Sourcing examples of environmental and social impacts from the CDM SDT (footnote 7) is inadequate to cover the kinds of impacts resulting from engineering-based removal technologies	This paragraph must be rephrased to take into account existing and potential negative and positive impacts of engineering-based removals. To not do so would make the SDT recommendation inconsistent with the content and purpose of the removals recommendation.	
5	13c iv)	E	This paragraph alludes to the kind of concerns and remedies that are to be developed fully in the recommendation on Appeal and Grievance processes.	This sub-paragraph should include either a footnote or a parenthetical sentence to indicate to Parties that their implementation of the SDT should include adoption of an Appeals and Grievance process, as outlined in that recommendation.	

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5	13d	E	The credibility of the activity participant's effective use of the SDT will depend in part on the transparency and opportunity for public review of the measures and actions taken to remediate negative impacts of emissions removal activities.	"to propose <u>and publicly report</u> measures and actions"		
5	Table 1	E	Regarding Guidance per an assessment of "Yes", delete "may": the best remedy here would be for Parties to establish legal/regulatory requirements but if Parties choose not to do so, mandatory use of industry best practices is the next best process	In case of lack of legal/regulatory requirements, the activity participant <u>must</u> take industry best practices		
5	24	E	Building and maintaining soil health is critical to sustainable development. Physical barriers to protect soil from erosion and contamination will not suffice because of the groundwater delivery of contaminants to soil.	"measures to ensure soil protection <u>and</u> <u>health</u> and minimize[d] erosion"		