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**Legend for Columns**

- 1 = Section Number in the document or Appendix
- 2= Paragraph, table or figure number
- 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

1 Section no.	2 Para., table or figure no.	3 Type of input G = general T = technical E= editorial	4 Comment	5 Proposed change (Include proposed text)	6 Assessment of comment (Completed by secretariat)
5	25	E	The “no net” qualifier implies that it is possible to “offset” degradation of soil in one project by purchasing a unit of soil enhancement elsewhere on the planet. Just as the IPCC has concluded with medium confidence that emissions cannot be compensated for on a 1:1 ratio, so too is soil “offsetting” not scientifically valid	“demonstrate <del>no net</del> degradation of soil resources and loss of ecosystem services provided by soils”	
5	29	E	It is difficulty to capture all the significant reverse impacts that might result from water use in engineering-based removal projects. IATP has proposed a couple amendments but the SB should consider adding more.	“significant adverse impacts on people, <u>agriculture (including inland fisheries and forestry), food security and biodiversity</u> ”	
5	31	G	The SB should specify, if only by illustration, what the words “are conserved” entail. For example, one metric for conservation is whether the activity contributes to the depletion of an aquifer/s from which the activity developers draw water.		
5.3.1	Footnote 30	G	This section on human rights should have as its foundational authorities United Nations human rights documents, rather than the Gold Standard principles and requirements.		
5.3.2	Footnote 32	G/E	This section should have as its foundational authorities the Conventions of the International Labour Organization, not the standards of the World Bank	Retitle the subsection heading “Labour and labour standards”	

Call for public input – Template for input

[Draft: Article 6.4 sustainable development tool \(ver. 02.0\)](#)

1	2	3	4	5	6
Section no.	Para., table or figure no.	Type of input G = general T = technical E = editorial	Comment	Proposed change (Include proposed text)	Assessment of comment (Completed by secretariat)
5	10, principle 6	G/E	A key term throughout the guiding questions is “during the activity life cycle.” If the life cycle begins with the validation of the project design and end with verification and the issuance of credits, does the activity participant bear legal responsibility and liability for adverse impacts in the post-crediting period? If not, do the Parties assuming that responsibility and liability and post-crediting monitoring of the removal project?	Provide a definition of “during the activity cycle” and “after the activity cycle”	
5	Table 11	E	A word is missing from this question. IATP has proposed one to complete the question	“Have local stakeholders’ groups/leaders raised gender equality concerns regarding the activity during the local stakeholder consultations?”	
5	54	E	Persons and communities affected by involuntary resettlement are seldom compensated fairly, adequately and effectively by governments, multi-lateral development banks and/or private developers. The SB and CMA should strive no to continue this unacceptable practice whose benefits often do not flow to the persons and communities whose lives and livelihoods were disrupted for the sake of development infrastructure projects.	“appropriate measures, including individual, family and community monetary compensation, and other in kind compensation, e.g. building and staffing schools and health clinics, to mitigate adverse impacts”	
5	59, footnote 43	E	The Inter American Development Bank Environmental and Social Policy Framework is neither universal nor a rights-based document.	The foundational authority for Principle 9: Indigenous Peoples should be the United Nations Declaration on the Rights of Indigenous Peoples. That authority should at least be recognized in foot note to Principle 9.	
5	66	E	Conflict resolution is unlikely to satisfy Indigenous Peoples as fair and transparent, if the resolution process is defined and conducted solely in the langue of the activity participant. If the Article 6.4 mechanism begins to operate by end-2024 without an agreed Sustainable Development Tool and Appeals and Grievance Processes, the fairness and effective operation of the Article 6.4 mechanism will be severely impaired.	“activity participants shall inform Indigenous Peoples in their native <u>languages</u> of the availability of the appeal and grievance processes under the Article 6.4 mechanism. <u>Removal activities shall not begin prior to the operationalization of this mechanism.</u> ”	

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5	Table 14	G	This principle, questionnaire and the authorities for it need much further elaboration to cover such bedrock principles as Know Your Customer and Anti-Money Laundering. Principles for countering corruption should not be source from documents of one Party. The SB may wish to consult the Interpol Environmental Crimes Unit for assistance.		
6	77b	E	In general, all activity participant self-assessments should be reviewed by the designated operating entity or other relevant government authority to ensure their accuracy and completeness relative to the principles and guiding questions.	“Activity participants shall assess and <u>report to the designated operating entity or relevant government authority</u> how the proposed activity may result in a direct and significant impact to the relevant SDGs”	
6	Table 16, question 13	E	In view of the increasingly dire state of the climate and the imminence of climate tipping points, to achieve SDGs by 2030, Parties should report their short-term strategies to the UNFCCC Secretariate, including financing requirement, to enable use of the SDT.	13.2.1 Number of countries with nationally determined contributions, long-term strategies, <u>short-term (by 2030) strategies</u>	
6	81	E	Simple sharing of the activity participant’s summary of its responses to the sustainable development question is one way communication. Prior publication and distribution to local stakeholders would advance sustainable development through dialogue.	“ <del>must be published and distributed prior to shared during</del> prior to the local stakeholder consultation to <u>facilitate discussion about the use of the SDT in the removals project area and advance input about that use to the designated operating entity validating the activity participant’s sustainable development performance.</u> ”	
6	84	E	The designated operating entity may not be able to determine the accuracy of the information provided in the risk assessment, but the DOE should be able to validate whether the information provided is relevant to the risk assessment and sufficiency to determine the quality of the risk assessment.	“The DOE shall validate the <u>appropriateness, relevance and sufficiency of information provided in A6.4 Environmental and Social safeguards risk assessment form</u> ”	

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6	85a	General	<p>The qualifier “(when available)” regarding a host country’s definition of “sustainable development” leads to the question of what should substitute for a host country’s definition of sustainable development if such a definition is unavailable. Should a country be allowed to host removal activities if there is no definition of sustainable development in that country that the DOE can use to validate the use of SD indicators by the activity participant?</p>		
6	86 and 89	G, E	<p>Does the DOE confirm compliance of the activity participant with SD indicator and environmental and social risk assessment requirements with the UNFCCC Secretariate? With the relevant host country authority? With both?</p>	<p>“The DOE shall confirm” identify to whom confirmation is made and what action the DOE is to take if it cannot confirm</p>	