

Call for public input – Template for input | [Draft: Article 6.4 sustainable development tool \(ver. 02.0\)](#)

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Date:
 _____1/12/2023_____

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	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)
NA	General	G	Document generally refers to host country regulations but activity implemented by PP of multi-country organisations may need to meet / assessment on a particular goal as a corporate requirement.	Hence text 'Host country Regulation' need to be expanded as Host country / other relevant regulation/obligation' This shall be checked and verified by DOE during validation and each verification activity.	
NA	General	T	There is no assessment of improved livelihood of beneficiaries – In certain cases it is quite relevant for example – cook stoves	Tool should require PP to assess, throughout crediting period, status of livelihood and positive or negative impact on beneficiaries. This shall be checked and verified by DOE during validation and each verification activity.	
NA	General	T	SD Assessment also need to include benchmarking, if possible	Wherever possible, PP should have an assessment compared with benchmark (sectoral, geographical etc.) and draw improvement plans for identified gaps, if any. This shall be checked and verified by DOE during validation and each verification activity.	
NA	General	T	Provision of demonstrating continual improvement over entire crediting period	SD assessment plan shall include this assessment, wherever relevant. This shall be verified by DOE during every verification activity.	

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)
5.2.2	20	T	<p><i>P2.1: Where historical pollution such as air contamination exists, the activity participant shall seek to determine whether it is responsible for mitigation measures. If it is determined that the activity participant is legally responsible, then these liabilities will be resolved in accordance with national law, or where this is silent, in coordination with national and local government agencies, communities, and the contributors to the contamination. Activity participants can use historical records, ongoing monitoring, and reporting through data logging of physical measurements, online sources and government data.</i></p> <p>Paragraph 20 stipulates that in the event of past air contamination, the participant in the activity must ascertain whether it bears responsibility for remediation. The manner in which an activity participant bears responsibility for mitigating pre-existing air contamination that is not attributable to the activity itself remains unclear.</p>	This must be thoroughly reviewed and illustrated with specific guidance.	
5.2.2	22	T	<p><i>P2.2: Where historical pollution such as land contamination exists, the activity participant shall seek to determine whether it is responsible for mitigation measures. If it is determined that the activity participant is legally responsible, then these liabilities will be resolved in accordance with national law, or where this is silent, in coordination with national and local government agencies, communities, and the contributors to the contamination. Activity participants can use historical records, ongoing monitoring, and reporting through data logging of physical measurements, online sources and government data.</i></p> <p>As per Para 22 it is required that if any historical land contamination exists then Activity participant shall determine whether it is responsible for mitigation. It is not clear how activity participant is responsible for the mitigation of existing land Contamination where it is not due to the activity?</p>	This must be thoroughly reviewed and illustrated with specific guidance.	

