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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

Overarching comment: The principles on social and environmental safeguards should not be downgraded to a “tick of box” exercise. We would appreciate the opportunity to submit more general comments on this document and not be limited to only providing comments based on the table below. The sustainable development tool, including environmental and social safeguards, should be assessed periodically and be updated and strengthened whenever relevant.

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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 <i>(Completed by secretariat)</i>
5, 13.	Table 1	T	Activity developer should not have an incentive to select N/A in order to safe resources (time) compared to other assessment outcomes. Therefore, also N/A should require justification	Option 1: N/A should be deleted as an option Option 2: require (in column guidance it should read): Justification shall be provided to support this conclusion, with evidence provided where required.	
5. 13.		G	The Timing of when the SD tool should be applied within the activity cycle seem to be unclear (from what it seems it should be applied before registration, however, the tool refers to stakeholder engagement processes that need to be undertaken before the beginning of implementation. Clarification should be added to this section.		
P.2.2 Land	Table 5	E	Principle “P2.2: Activities that involve the production, harvesting and/or management of living natural resources by small-scale landholders and/or local communities shall adopt appropriate and culturally sensitive sustainable resource management practices“ is not transformed into question in table	Add: P2.2: Has the Activities that involve the production, harvesting and/or management of living natural resources by small-scale landholders and/or local communities adopted sustainable resource management practices.	

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P2.3: Water		G	This principle should acknowledge and differentiate between different types of water (green/grey/blue)		
5.3.1 Principle 4: Human rights And 5.3.2 Principle 5: Labour32	Table 8; Table 9	G	Conclusion of do-no-harm risk assessment on principle 4 (Human rights) and all other principles: N/A should not be given as an option.	N/A should be deleted.	
5.3.1 Principle 4: Human rights30	Table 8	E	P4.3 “Does the activity participant confirm that the activity does not lead to inequitable or discriminatory impacts on affected populations, particularly people living in poverty, or marginalized or excluded individuals or groups, including persons with disabilities?” It seems that marginalized includes excluded. This language should be streamlined throughout Table 8	“Does the activity participant confirm that the activity does not lead to inequitable or discriminatory impacts on affected populations, particularly people living in poverty, or marginalized or excluded individuals or groups, including persons with disabilities?”	
5.3.2 Principle 5: Labour32	44 c) and table 9, P5.1 c)	E	To take into account intersecting forms of discrimination creating certain vulnerabilities, the para should include multiple and intersecting forms of discrimination	Protecting project workers, including vulnerable workers, caused by multiple and intersecting forms of discrimination such as gender inequalities, as well as pregnant persons, persons with disabilities and migrant workers, contracted workers, community workers, and primary supply workers, as appropriate	
5.3.2 Principle 5: Labour	45. P5.1 And Table 9: P5.1a	E	“Promoting education programmes for local communities to access labour opportunities created by the proposed activity”: Add additions of groups that are experiencing multiple and intersecting forms of discrimination regarding education	Promoting education programmes for local communities, in particular women and girls in all their diversity, to access labour opportunities created by the proposed activity	

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Principle 6 (Health and safety) criteria:	47	T	<p>“ 47. P6.1: The activity shall avoid community exposure to increased health risks (e.g. pollution, contaminated areas/resources) and disease and shall not adversely affect the health of the workers and the community.”</p> <p>The language in this paragraph is problematic from the health/medical language perspective.</p>	<p>The activity shall avoid or prevent community exposure to short-term, medium-term and long-term health risks (e.g. pollution, contaminated areas/resources) and shall not adversely affect the health of the workers and the community.</p> <p>Please note: the definition of health must be as per the World Health Organization: “a state of complete physical, mental and social well-being and not merely the absence of disease and infirmity.”</p>	
Principle 6 (Health and safety) criteria:	48 And table 10	E	<p>“48. P6.2: The activity shall put measures in place to protect workers from the inherent risk of the nature of their work/sector, including, but not limited to, physical, chemical, biological and radiological hazards, and specific threats to women.”</p> <p>Add reproductive health, as the risk affecting all genders.</p> <p>In addition, there seem to be a question on 6.2 is missing in the table</p>	<p>“48. P6.2: The activity shall put measures in place to protect workers from the inherent risk of the nature of their work/sector, including, but not limited to, physical, chemical, biological and radiological hazards, and specific threats to women’s, girls’ and reproductive health.”</p>	
Principle 6 (Health and safety) criteria:	50 And table 10	E	<p>50. P6.4: The assessment and adopted management measures shall take into account differences in risk exposure and sensitivity of women and men, as well as marginalized and disadvantaged groups, including children, older persons, persons with disabilities, minorities, and Indigenous Peoples.</p> <p>Rephrase in a gender-sensitive manner, also including boys and girls, pregnant women and other vulnerabilities or specificities regarding gender</p> <p>In addition, there seem to be a question on 6.4 is missing in the table</p>	<p>50. P6.4: The assessment and adopted management measures shall take into account differences in risk exposure and a gender-sensitive approach, as well as of marginalized and disadvantaged groups, including children, older persons, persons with disabilities, minorities, and Indigenous Peoples.</p>	

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Principle 6 (Health and safety) criteria:	Table 10	T	<p>Second principle level question: “Does the activity participant confirm that the proposed activity does not involve potential risks to health and safety of affected communities during its life cycle?”</p> <p>This question missed out that the health and safety of the communities may be affected even after the activity life cycle. E.g., during the post-crediting period of activities involving removals due to reversals or leakage.</p>	<p>Add: Does the activity participant confirm that the proposed activity does not involve potential risks to the health and safety of affected during its life cycle and after its life cycle, especially for activities involving removals?</p>	
Principle 6 (Health and safety) criteria:	Table 10	T	<p>Additional guiding question: “Risks of water-borne or other vector-borne diseases (e.g. temporary breeding habitats), communicable and noncommunicable diseases, nutritional disorders, mental health.”</p> <p>This question is gender blind and does not include gender-based violence (e.g. sexual abuse and harassment) which is a documented risk faced by women and girls.</p>	<p>Add: Risks of water-borne or other vector-borne diseases (e.g. temporary breeding habitats), communicable and noncommunicable diseases, nutritional disorder, and mental health, including gender-based violence.</p>	
5.3.4 Principle 7: Gender equality	52	E	<p>52. P7.1: The activity shall not reinforce gender-based discrimination and shall not lead/contribute to adverse impacts on gender equality and/or the situation of women.</p> <p>The para should refer to girls as well whose situation should not be worsened.</p>	<p>52. P7.1: The activity shall not reinforce gender-based discrimination and shall not lead/contribute to adverse impacts on gender equality and/or the situation of women and girls in all their diversity.</p>	
5.3.4 Principle 7: Gender equality	Table 11 P 7.1	G	<p>“Any gender equality concern(s) raised during the local stakeholder has/have been documented and addressed?”</p> <p>This question is very important and it should be ensured that it is monitored if more consultations are taking place at a later stage of the project activity cycle</p>	n/a	

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5.3.4 Principle 7: Gender equality	Table 11 P 7.2	E	<p>“The activity does not pose a risk to the principle of non-discrimination, equal treatment, equal pay for equal work (e.g. equal payment for women and men for the implementation work of the activity; fair conditions for women and men to participate in the implementation of the activity considering pregnancy/maternity/paternity leave/marital status; inform community (women and men) about the implementation of the activity in an accessible manner to ensure full engagement).”</p> <p>This principle should also include references to equal careers opportunities and access to leadership positions, prevent gender-based discrimination to access leadership positions</p>	<p>“The activity does not pose a risk to the principle of non-discrimination, equal treatment, equal pay for equal work (e.g. equal payment for women and men for the implementation work of the activity; fair conditions for women and men to participate in the implementation of the activity considering pregnancy/maternity/paternity leave/marital status; prevention of sexual abuse and harassment, inform community (women and men) about the implementation of the activity in an accessible manner to ensure full engagement), including access to leadership positions.”</p>	
5.3.4 Principle 7: Gender equality	Table 11 P 7.2	T	<p>The activity should not contribute to un-paid workload of women and girls or add care work responsibilities. A respective principle should be added to the table</p>	<p>Add 7.2 The activity does not involve or lead to reproducing discriminations by adding to the unpaid workload of women and girls, in particular the design and implementation of the activity does not increase care work responsibilities for women and girls in all their diversity.</p>	
5.3.4 Principle 7: Gender equality	Table 11 P 7.2	E	<p>The activity does not involve or lead to reproducing discriminations against women based on gender, in particular participation in the design and implementation or access to opportunities and benefits.</p>	<p>The activity does not involve or lead to reproducing discriminations against persons based on their gender, in particular participation in the design and implementation or access to opportunities and benefits.</p>	
5.3.4 Principle 7: Gender equality	Table 11 P 7.2	T	<p>The activity should not only prevent limitations to natural resources but also prevent limitations on the use and access of infrastructure and services or other common goods. A respective principle should be added.</p>	<p>Add 7.2 The activity does not involve or lead to limitations on women’s and girl’s in all their diversity and groups’, affected by multiple and intersecting forms of discrimination, to use and access infrastructure and services or other common goods, considering their different roles and positions (for example, activities that increase pressure on public transport services and this could increase the risk of gender-based violence on women and girls when they use the services).</p>	

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Principle 10 (Corruption) criteria:	After principle 68 and for table 14	T	The section on corruption seems to be rather short and under-developed compared to other sections. We would recommend adding the principle of establishing a policy against corruption and other prohibited practices, if it is not available, and confirming that the activity participant has a Code of Conduct that prevent corruption and other prohibited practices and takes steps in case corruption is reported.	Add 69 and a principle 10.1: The activity developer confirms the existence of an in-house policy against corruption and other prohibited practices, and an internal Code of Conduct that prevents any activity related to corruption and prohibited practices, and having robust internal and external steps (including grievance mechanism/whistleblowers protection) in case corruption appears during the preparation or implementation of an activity.	
Principle 10 (cultural heritage) criteria:	72.	G	Define the term competent professional (could it not also be Indigenous Peoples' and local communities for instance?)		
6.3.1 Developing activity-level SD indicators	80.	Add another step 2	Stakeholder consultations' input as well as the inclusion of external experts should be applied to develop realistic Sustainable development plans and to adapt to local circumstances	Add Step 2: Activity participants are required to elaborate relevant activity-level indicators for the SDGs identified as impacted and present them during inclusive stakeholder consultation processes to get input from stakeholders and external experts	