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Check the box that applies to submitter:

CDM DOE or Validation & verification body (VVB)

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Legend for Columns

- 1 = Section Number in the document
- 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)
		E	The numbering of the questions is confusing and does not provide a clear reference for comments.	Include a clear numbering system for the questions	
4	15.(f)	T	The requirement provides for the possibility of offsetting adverse effects. It is not clear why offsetting is a possibility.	Suggestion to either clarify with clear and practical examples what is meant by offsetting or to remove this option.	
4	15.(k)	G	The definition of child labour should follow international rules. Mentioning morality is a subjective aspect that cannot be evaluated.	Use ILO standard or similar	
5	Table 1 Yes	T	For YES, "is likely to fail to meet legal/regulatory requirements" is included. The word "likely" implies a possibility, not a confirmation, so it is not understandable why this is included under YES.	Change the condition to "Potentially"	
5	Table 1 Potentially	G	The statement "may be relevant at some point" is completely subjective and can never be answered negatively, which means that the only possible answer to any question is "potentially".	Change the requirement to clearly include the likely statement form Yes or explain what is meant by "may be relevant at some point".	
5	Table 1 No	G	The guidance states that 'evidence' should be provided where required. If an issue is not relevant, evidence cannot be expected.	Removing the requirement for evidence as a justification will be validated.	
5	Table 3	G	At the end of each principle is a conclusion on the "do no harm" risk. There is no explanation of how this risk is to be determined, given that different questions are likely to have different answers.	It must be clear how the overall risk is to be assessed; if only one question is presented as a question at the principle level, this result must be the result of the corresponding principle.	
5	Table 4 Table 5	T	The question states "Is the proposed A6.4 activity located in an area where historical pollution...". There is no definition of what is meant by an area, nor how far in the past it is meant to be historical. Without this information it is not possible to assess this question.	It should be clear that only the project area is meant here, and that historical refers to the period immediately before the start of the activity, or the current situation if the project is in the planning stage.	

Call for public input – Template for input

[Draft: Article 6.4 sustainable development tool \(ver. 06.0\)](#)

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)
5.3.7	Table 14	G	As the DOE is not a police authority, the only possibility for a DOE is to confirm that the statement prepared by the activity participant is available and contains the required information. No further assessment is possible as a DOE cannot act as a prosecutor.		
5.3.8	81	G	The requirement to use professionals recognised by government or academia seems to apply to any activity, regardless of the situation.	It should be made clear that this only applies if the site is located in areas where cultural heritage is expected to be found.	
6.3	88. (c)	G	As noted, "significance is a subjective term", so it is not clear how an object audit result with a reasonable level of assurance can be given on a subject aspect.	The DOE's assessment of the impact on sustainable development is based on a limited level of assurance to reflect the subjectivity of the requirements.	
6.3.1	90. (a) (b)	G	Step 1 requires the development of activity level indicators for all identified impacts. Step 2 requires monitoring of the same. This implies additional effort even for positive impacts.	The requirement applies only to negative impacts, leaving it up to participants to decide whether to monitor positive impacts.	