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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)
34	P2.3	T	The term 'significant must be defined for the phrase 'significant water consumption', as otherwise it can be freely interpreted and thus misused.		
24	5.2.2.	T	The term 'excessive' must be defined for the phrase 'excessive water consumption', as otherwise it can be freely interpreted and thus misused.		
25	P2.1	T	The term 'feasible' must be defined for the phrase 'when avoidance is not feasible', as otherwise it can be freely interpreted and thus misused. This should be done every time the term 'feasible' is used.		
34	P2.3	T	The use of water consumption offsets to compensate for water consumption and the associated negative impacts on people and biodiversity should not be permitted. There are several reasons for this: 1) It is possible that the water offset may in turn have other negative impacts that cannot be taken into account. 2) While an impact is always certain, offsets are fundamentally associated with uncertainty. The use of an offset for an offset increases this uncertainty to such an extent that it is not tolerable compared to the impact that is certain to occur. 3) The methodology and standard and thus the quality of a water offset is not transparent.		

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	Table 1	T	Throughout the text, the use of "host country regulations" or "host country laws" is repeatedly mentioned. This is not the best solution as some countries may have regulations or laws that are below what is required to meet the claimed standard of the A6.4 tool. Instead, minimum standards and regulations should be developed that can only be surpassed by national regulations and laws if these are more stringent.		
37	5.2.3	T	In addition to cumulative impacts, emergent impacts can also occur, which must also be taken into account. These are impacts that result from activity-related impacts and are greater than the sum of the individual impacts.	Activity participant shall consider the direct, indirect, cumulative, and emergent activity-related impacts on habitats and the biodiversity they support.	
25	P2.1	T	It is often written that pollution sources should be minimized and/or controlled, but it is unclear to what level. This risks that these efforts will be marginal if performed at all		
89	6.3	T	Again, we do not understand why materials used in wind-turbines should not be considered. We want to reenforce that not only should the full GHG life cycle emissions of projects be accounted for, but also the sustainable development impacts of the project along its supply chain.	Further, the activity participant must consider negative impacts to SDG 12 due to materials used in wind turbines since the scope of the negative impact in this tool is based on the impact arising from the implementation and operation of the proposed activity.	
92	6.4	T	Make explicit how other impacts included in this tool e.g. Water, Air, Social issues are included in the monitoring.		
		G	Looking at the question: Does a proposed A6.4 activity introduce any risk of loss of ecosystem services? We are wondering how such a risk can be altogether denied for any kind of activity.		

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		G	Does the proposed A6.4 activity have any risk of not meeting the requirements for environment-friendly, socially beneficial, and economically viable plantations using native species whenever possible? We are already wondering what 'possible' in this context should mean- when is it feasible and when not? What if there is a trade-off between native species and economic goals? Can I then claim that it was just not possible? I think the document should acknowledge the subjectivity of possibility as well-OR provide clear guidance on which negative impacts are deemed impossible to avoid and what criteria would lead to a project not being eligible.		
		G	The tool draws heavily on the language of the mitigation hierarchy (first avoid, then minimize etc.) however it remains unclear when avoidance is mandatory and might lead to a project not being eligible. If there are no exclusion criteria for projects that do not follow the avoid step, we see the risk of this guidance to have close to no effect.		