

Name of submitter: Mr. Sergey SITNIKOV, Ph.D.

Check the box that applies to submitter:

CDM DOE or Validation & verification body (VVB)

Contact email of submitter:

Date: May 17, 2024

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 <i>(Completed by secretariat)</i>

<p>2, 4</p>	<p>4, 15(n)</p>	<p>G</p>	<p>For the reasons below, the references to Article 6.4 activities made in the draft document and the related terms proposed in the draft document may contradict the approach set forth in the RMP and are recommended for revision.</p> <p>The RMP operates with the term “activity” (as it relates to the “Article 6, paragraph 4, activity”, per Para 1(a) of the RMP). According to Para 31(b) of the RMP, an activity “may be a project, programme of activities, or other type of activity approved by the Supervisory Body”. Any use of the term “activity” (or “activities”) in the draft document should not contradict Para 31(b) of the RMP and should be construed as including both “projects” and “programmes of activities”. (As a side note, the term “programmes of activity” proposed in the draft document does not fully comply with the term “programme of activities” set forth in Para 31(b) of the RMP.) Using the term “activity” (or “activities”) in the draft document in a way that excludes “programmes of activities”, or in a manner that separates and equalizes “programmes of activities” and “activities” (e.g., by saying “activities OR programmes of activity”, or “activity OR PoA”), or as an alternative to the already existing term “project”, may lead to a lack of clarity in the proposed regulation and its potential noncompliance with the RMP.</p>		
<p>2</p>	<p>10</p>	<p>G</p>	<p>Here, and throughout the draft document, it is recommended that the</p>	<p>10. The validated A6.4 Environmental and Social Safeguards Risk Assessment Form, the A6.4 Environmental and Social</p>	

Call for public input – Template for input [Draft: Article 6.4 sustainable development tool \(ver. 06.0\)](#)

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)
			terms defined in the RMP be used as per their original definition.	Management Plan and A6.4 the Sustainable Development Tool Form shall be part of the registered activity documentation and will be used for ex-post monitoring during the crediting period and shall be verified by a DOE during each request for issuance of Article 6, paragraph 4, emission reductions [A6.4 ERs].	
4	15(n)	G	Neither the Paris Agreement nor the RMP provides an exhaustive definition for the term "stakeholders." Creating such a definition in the draft document could potentially result in the exclusion of certain parties from the framework established by the Paris Agreement and related regulations. Furthermore, this could potentially restrict the rights of such parties under the Paris Agreement-based framework. Therefore, it is recommended that the proposed document adhere to the approach of the RMP and not establish a definition for the term "stakeholders" (so as to keep it as open as reasonably possible) unless it is absolutely necessary and justified, and does not lead to any limitation of parties' rights in any way.		

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)
7, 8	94, 97	G	Here, and throughout the draft document, the use of the terms "project" and "activity" should be reviewed to ensure consistency, and revised if necessary, to avoid the unjustified use of different terms for the same category.		
2, 4, 6, 7, 8	4, 15(n), 83, 94, 97	G	Here, and throughout the draft document, the use of undefined terms (such as, for example, "PoA" or "PoAs"), even when their meaning seems apparent, is recommended to be avoided.		
5	47	G	It is recommended that the proposed regulation be revised to ensure that it creates no misinterpretation of the fact that any and all human rights are to be respected by activity participants.	47. The activity participant shall respect international human rights (including, inter alia, those regarding sustainable development, poverty alleviation and ensuring fair distribution of development opportunities and benefits) . Also, an activity is to be implemented with due respect for human rights by avoiding infringement on the human rights of others and addressing adverse human rights impacts that the activity may cause or to which it may contribute.	
8	97	G	It is recommended that the proposed regulation cover not only emission reductions, but also emission removals.	[..] the verification of emission reductions and/or removals for any given monitoring period,[..]	