



Carbon Market Watch inputs to the Article 6.4 Supervisory Body ahead of its 11th meeting: appeal and grievance processes

Brussels, 22 April 2024

Dear Members and Alternate Members of the Article 6.4 Supervisory Body,

Carbon Market Watch welcomes the Call for Input for the annotated agenda and related annexes of the next meeting of the Article 6.4 Supervisory Body. We would hereby like to submit input on [A6.4-SB011-AA-A05 - Draft procedure: Appeal and grievance processes under the Article 6.4 mechanism](#).

In its current condition, we do not think the draft procedure is ready for adoption at the 11th meeting of the Supervisory Body. Due to the CMA's decision not to adopt the Supervisory Body's recommendations at COP28, Carbon Market Watch urges the Supervisory Body to use the time before operationalisation of the 6.4 mechanism to hold a structured consultation of at least one month before proceeding with the next iteration of the procedure, actively seeking input from IPs and LCs and other rights-holders as well as actively involving the Indigenous Peoples constituency and encouraging their participation. We also urge the Supervisory Body to consider the Green Climate Fund's complaint mechanism, the Independent Redress Mechanism, as an example.

Our recommendations can be found below, as well as a comparison of the Independent Redress Mechanism of the Green Climate Fund with the current draft appeal and grievance processes.

4. Appeal process

PARA	DRAFT PROCEDURE TEXT	COMMENTS
7	<p>Option 2 (appeal is possible against decisions on activities, methodologies and standardized baselines):</p>	<p>Excluding decisions on activities, methodologies and standards will severely limit the possibility to contest some of the most impactful decisions made by the Supervisory Body, such as decisions regarding the registration of activities. This option must therefore be retained.</p>
7	<p>An appeal may be filed against an appealable decision of the Supervisory Body, as defined in paragraph 9 below, by the following individuals, communities and organizations (hereinafter referred to as appellants):</p> <ul style="list-style-type: none"> (a) The stakeholders who were eligible to participate in the activity's local stakeholder consultation conducted in accordance with the activity standard;] (b) The activity participants of the activity in question as identified in the modalities of communication submitted in accordance with the activity cycle procedure; (c) The designated national authorities (DNAs) of the host Party and other Parties participating in the activity through authorization of activity participants of the activity in question; 	<p>Limiting the standing of appellants to these three categories is unnecessarily limiting. According to the activity standard, the local stakeholder consultation will invite "as a minimum, representatives of local stakeholders directly impacted by the proposed A6.4 project, including local communities and indigenous peoples as applicable, and representatives of local authorities relevant to the project". However, during an activity, it can become clear that more rights-holders are directly or indirectly impacted by said activity than was initially foreseen; ripple effects can occur (such as pollution of a river which can affect communities not in the direct environment of the activity). The standing of an appellant cannot be limited ex-ante; it must be decided on a case-by-case basis whether the potential appellant has standing.</p> <p>In addition, it is worth noting that stakeholders affected by activities might not always have the capacity to log formal appeals, or might not be aware of the Article 6.4 mechanism, let alone any possible appeals process. Maintaining access for civil society is a key element to avoid access restrictions to the appeals process.</p>

12	<p>¶The secretariat shall issue a statement of the appeal fee due and the bank transfer instructions, and shall communicate this to the appellant. The appellant shall pay the appeal fee within 30 days of receipt of such statement. The appeal fee shall be determined as follows:</p> <p>(a) Standard appeal fee of USD [5,000] [2,500];</p> <p>(b) [Reduced appeal fee of USD [2,500] [No appeal fee] if the appeal is submitted by indigenous peoples or the appeal is in relation to the activities located in least developed countries, small island developing States or specially underdeveloped zones in developing countries as designated by the host Party governments in an official notification for development assistance, including for planning, management or investment, satisfying any one of the following conditions using most recent available data:</p> <p>(i) The proportion of the population in the zone with income of less than USD 2.15 per day, adjusted by purchasing power parity, is greater than 50 per cent;</p> <p>(ii) The gross national income per capita of the country is less than USD 3,000 and the population of the zone is among the poorest 20 per cent in the poverty ranking of the host country as per the applicable national policies and procedures;</p> <p>(iii) The proportion of the population in the zone with income of less than the national poverty line used by the host country for reporting on the Sustainable Development Goals is greater than 50 per cent.]</p>	<p>While an appeal fee may be warranted in certain cases, a reduced appeal fee of USD 2500 would not make the appeal process accessible for everyone. This is still a large sum of money and will be a barrier for those without sufficient means to make an appeal. There should therefore be no appeal fee if the appellant fits any of the described categories. In addition, there should be no appeal fee for appeals lodged by stakeholders who can demonstrate that they have no direct financial interest in the activity nor in the outcomes of the appeals process.</p>
13	<p>Notwithstanding sub-paragraph 12(b) above, the appellant shall deposit a bond in the sum of the standard fee if the appeal is filled against a Supervisory Body decision referred to in paragraph 9(c) above.</p>	<p>A bond is not a solution for 'limiting vexatious and frivolous appeals'. What this <i>will</i> do, however, is limit the accessibility and equitability of the appeals process. An appeal against a Supervisory Body decision related to approval or rejection of a request for issuance of Article 6, paragraph 4, emission</p>

		reductions (A6.4ERs) for a registered A6.4 activity, as described in para 9(c), can be posed not only by activity participants, but also by rights-holders. Only those who can miss, and potentially stand to lose, the bond sum, will have access to the procedure on this ground. Requiring a bond deposit even when appellants meet the requirements set out to qualify for no appeal fee will be a grave error as it poses a major barrier to the process.
19	Once the chair of the appeal panel has confirmed that the appellant and the appeal satisfy all of the eligibility requirements for appeals, the secretariat shall publish the appeal on the UNFCCC website and immediately notify the Supervisory Body of the publication of the appeal. The personal identification and data indicated by appellant as confidential as per sub-paragraphs 11(a) and 11(c) above shall not be published.	While the provision that information indicated as confidential will not be published is important for the protection of appellants, the possibility to request confidentiality should not be limited merely to paragraphs 11(a) and 11(c). Information to demonstrate the relationship of the appellant to the activity as per para 11(b), for example, can indirectly be used to identify the appellant. A signed affidavit, as per para 11(e), will also contain identification information. Moreover, it is of utmost importance that full confidentiality remains a possibility, especially in the case of retaliation risks. There should therefore be a possibility for all information in the appeal to be made confidential.

5. Grievance process

PAR	DRAFT PROCEDURE TEXT	COMMENTS
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36	A grievance may be submitted by individuals, communities and organizations (hereinafter referred to as grievants) that meet all the following eligibility requirements:	Restricting the access to file a grievance by requiring grievants to meet all the eligibility requirements in this paragraph is unreasonable. Meeting one of the requirements should be sufficient. Moreover, requirement (c) should be broadened to cover a wider scope of potential grievances.

	<p>(a) {They are connected to the jurisdiction, by means of residency or domicile, where the activity in question is implemented; in the absence of documentary evidence, the residency or domicile can be proven by any other means that demonstrate the grievant's connection to the jurisdiction.}</p> <p>(b) {They have substantial presence in the geographic area, by means of their business activity or community-related activity, which is directly affected by the activity in question;}</p> <p>(c) They suffer direct adverse effects from the implementation or treatment of the activity in question within the activity cycle under the Article 6.4 mechanism by way of concrete, tangible and particularized claim of harm to the health, property, local environment or other interest.</p>	<p>First, it can be difficult to establish a direct causal relation to the harm suffered, despite the existence of a clear relationship between the A6.4 activity and the harm. Second, it should be possible to lodge a grievance when there is reasonable and justifiable potential of adverse effects, rather than all grievances having to be filed ex-post. Third, it should be possible for stakeholders to lodge a grievance when the activity results in a reasonable risk of harm to communities or the environment. This will enable broader protection of communities and the environment. Without this, a stakeholder that has identified clear cases of harm, might not be able to inform the 6.4SB about it until/unless one of the entities directly affected by the harm lodge the complaint. This is particularly problematic in cases where people might fear reprisal, or in cases where the harm affects the environment but does not directly affect any human being in the short term.</p> <p>Requirement (c) should therefore be broadened to include indirect and potential adverse effects, as well as include any stakeholder which possesses credible evidence of harm connected to the activity.</p>
37	<p>A grievance may be submitted only on the basis of adverse effects of a social, economic or environmental nature suffered by local individuals, communities or businesses as a direct consequence of the implementation or treatment of a registered A6.4 activity within the activity cycle under the Article 6.4 mechanism for suffered by communities or businesses in the countries where an approved Article 6.4 mechanism methodology, methodological tool or standardized baseline is applicable as a consequence of approval of such methodology, methodological tool or standardized baseline.</p>	<p>Limiting the timeframe for a grievance to the activity cycle of the activity is not good practice. The situation of a potential grievant, as well as the nature of a grievance, can be such that filing a grievance is not possible in time, especially when a grievance relates to an event at the end of the activity cycle. In addition, some harms might take time to materialise and be noticed, and this limitation would fail to provide access for redress for this kind of harm (for example, contamination of water or the environment, with severe health impacts that materialise several years after the contamination has occurred).</p>

<p>39</p>	<p>A grievant or its authorized representative (hereinafter collectively referred to as a grievant) may submit a grievance, through a dedicated interface on the UNFCCC website, 21 of 29 A6.4-SB011-AA-A05 Draft Procedure: Appeal and grievance processes under the Article 6.4 mechanism Version 04.0 a duly completed “Grievance form” (A6.4M-GRI-FORM)⁴ covering the following information within the valid crediting period of the Article 6.4 activity in question:</p> <p>(a) The name and category (e.g. individual, community, organization) of the grievant.; The grievant may indicate if the personal identification and data shall be treated as confidential; (b) The relationship of each individual, community and organization listed as the grievant to the activity in question to demonstrate the its eligibility requirements of the as grievant as per the requirements of paragraph 36 above;</p> <p>(c) The name and contact information (email address, phone number, physical address) of the focal point of the grievant;. If an authorized representative of the (original) grievant submits the grievance, the evidence of such authorization (signature of the grievant). The grievant may indicate if the personal identification and data shall be treated as confidential;</p> <p>(d) The title and UNFCCC reference number of the A6.4 activity in question;</p> <p>(e) Description of the [potential or] actual direct adverse effect on the grievant and how it is related to the implementation of the Article 6.4 activity in question and a declaration in the form of an affidavit on the actual direct adverse effect and its</p>	<p>While we commend the addition of the option of an authorised representative, this paragraph is still limiting accessibility. An authorised representative is not always an option for grievants.</p> <p>Requiring grievants to file their grievance through a website form means requiring all to have access to the Internet and to be able to read and write. The paragraph also does not explicitly state that the form will be accessible in multiple languages.</p> <p>A grievant should be able to access the grievance process through a wide variety of means. For example, in addition to submissions via an online complaints form, options to lodge a grievance can be through Whatsapp, mail, email, voice or video recording, by calling a toll-free hotline, or during an in-person meeting, which are all possible under the Green Climate Fund’s Independent Redress Mechanism. Limiting the submission to written or online channels only is exclusionary, and will especially risk excluding those who already have limited access to other legal or jurisprudential means.</p>
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	<p>relation to the implementation of the Article 6.4 activity;</p> <p>(f) Description of a suggested remedy;</p> <p>(g) References to supporting documents, which may be attached, and other sources of information, with an explanation as to how the supporting documents and other information support the arguments made in the grievance;</p> <p>(h) Reference to or evidence of any previous or ongoing attempt to resolve the issue directly with any other individual or organization.</p>	
40	<p>[The secretariat shall issue a statement of the grievance fee due and the bank transfer instruction, and shall communicate this to the grievant. The grievant shall pay the grievance fee within 30 days of receipt of such statement. The grievance fee shall be determined as follows:</p> <p>Option 1 (differentiated by grievant):</p> <p>(a) Standard grievance fee of USD [5,000][2,500];</p> <p>(b) [Reduced grievance fee of USD [2,500]][No grievance fee] if the grievance is submitted by indigenous peoples or is in relation to the activities located in least developed countries, small island developing States or specially underdeveloped zones in developing countries as defined in paragraph 12(b) above.]</p> <p>Option 2 (differentiated by grievance type):</p> <p>(a) Standard grievance fee of [5,000] [2,500];</p> <p>(b) No fee if the grievance is:</p> <p>i. Pertaining to violations of human rights as defined by the national law of the host Party to enforce</p>	<p>By the very nature of a grievance, and by virtue of the many restrictions on who can file a grievance, it makes no sense to request a fee. The access to the grievance process is already limited to those experiencing adverse effects and/or present in the geographic area where the activity in question is implemented (which is itself problematic and should not be maintained, as per our comments above). The only impact of a fee, therefore, is to raise a financial barrier to the filing of a grievance, which is unacceptable.</p> <p>Differentiating grievance fees by type of grievance is likewise an unnecessary and unhelpful barrier to potential grievants. It is already made clear in the scope of grievances that can be filed that they will be delicate matters of harm experienced by people on the ground: “adverse effects of a social, economic or environmental nature suffered by local individuals, communities or businesses” (para 37). Further distinguishing between these adverse effects does not justify requiring a fee for grievants.</p> <p>While we understand the financial cost that grievances can bring, this is a cost embedded in the running of the mechanism. There cannot be a well-functioning mechanism without this opportunity; just like there</p>

	<p>the United Nations Universal Declaration of Human Rights;</p> <p>ii. Associated with access to land, land acquisition, and resettlement and infringements of free, prior informed consent;</p> <p>(c) Half fee [2500] [1250] if the grievance is:</p> <p>i. Associated with deterioration of environmental or social conditions due to the implementation or treatment of the A6.4 activity in question;</p> <p>ii. Associated with [violations][non-compliance] of implementation of planned remedial measures of negative impacts, if any, during and after the implementation of the A6.4 activity in question in accordance with the “Article 6.4 sustainable development tool”;</p>	<p>cannot be a well-functioning mechanism without sound methodologies and strong governance rules. The cost of running a grievance procedure should be included in the overall costs of running the mechanism, and should hence be covered by the regular financing channels for the mechanism, e.g. registration and issuance fees. This should not be seen as an extra benefit that external stakeholders can only access via payments.</p>
42	<p>Upon receipt of the grievance fee, if applicable,] the secretariat shall undertake the completeness check within 7 days to determine whether the submitted grievance form contains all required information referred to in paragraph 39 above. If the secretariat finds that the information contained in the grievance form is incomplete, it shall request the grievant, by providing the reason for incompleteness, to submit a revised form to fill the gap within 1421 days. In this case, if the grievant does not submit a revised form within this timeframe, or the submitted revised form is still found to be incomplete, the grievance shall be deemed withdrawn and the secretariat shall notify the grievant accordingly[, reimbursing the grievance fee after deducting USD [500] [if the grievance fee has been paid in accordance with paragraph 40 above40 above]].</p>	<p>While we recognize the extension of the timeframe, from 14 to 21 days, this timeframe should be 30 days at a minimum, in line with best practice (the timeframe of the Green Climate Fund’s Independent Redress Mechanism).</p>

45	<p>Once the chair of the grievance panel has confirmed that the grievant and the grievance satisfy all of the respective eligibility requirements for grievances, the secretariat shall publish the grievance on the UNFCCC website and immediately notify the Supervisory Body of the publication of the grievance. The personal identification and data indicated by the appellant as confidential as per sub-paragraphs 39(a) and 39(c) above shall not be published.</p>	<p>This paragraph is not sufficient to address the issue of confidentiality. While CMW appreciates the addition of several provisions to ensure confidentiality, namely in paragraphs 39(a) and 39(c), the possibility to request confidentiality should not be limited merely to those paragraphs. Information to demonstrate the relationship of the appellant to the activity as per para 39(b), for example, can indirectly be used to identify the grievant. A signed affidavit, as per para 39(e), and information on previous attempts to resolve the issue, as per para 39(h), will also contain identification information. All information in the appeal should possibly be requested to be made confidential.</p> <p>Moreover, requirements to ensure the safety and protection of grievants entail more than just designating information as confidential. This includes options to sign a non-disclosure agreement or, while clearly indicating its downsides, the option to file a complaint anonymously. Additionally, as (fear of) retaliation can be a deterrent and a serious safety risk for grievants, this must be prevented by having retaliation safeguards in place. This includes confidentiality, but also other proactive precautionary measures, such as risk assessments, secure communication channels, and logistical arrangements. More examples of such measures can be found in the CAO guidelines.</p>
49	<p>The grievance panel shall reject the grievance if:</p> <ul style="list-style-type: none"> (a) Insufficient information is provided to prepare a recommendation (e.g. the information is too general, unspecified and therefore non-actionable); (b) Additional information requested in accordance with paragraph 46 above is not provided by the specified deadline particularly for from the grievant; (c) The grievant organization's legitimacy to represent potentially affected individuals, entities or 	<p>A blanket statement that a grievance will be rejected if the deadline for submission of requested additional information has passed, without provisions for an extension of the deadline, is unreasonable and unjustified. There should be provisions to take special circumstances into consideration.</p>

	communities is not explicit and proven, as applicable.	
56	<p>If the grievance panel issued recommendations referred to in paragraph 48(c) above, the Supervisory Body shall either:</p> <p>(a) Take actions within the activity cycle as it deems appropriate; or</p> <p>(b) Decide not to take actions regarding the activity in question within the activity cycle.</p>	<p>This paragraph gives the impression that it is optional for the Supervisory Body to take actions based on the recommendations by the grievance panel. The recommendations from the grievance panel should have implications for the Supervisory Body, and it should not be possible for the Supervisory Body to disregard these recommendations. This will have serious implications for the adequacy and legitimacy of the grievance panel.</p> <p>At a very minimum, the SB should be required to properly consider each recommendation and provide clear and public justifications for why it decided to take actions or not.</p>

7. Other matters

PAR	DRAFT PROCEDURE TEXT	COMMENTS
A		
81	<p>Information marked as proprietary or confidential that is obtained from appellants, grievants, activity participants or any other individuals and organizations for the purpose of processing appeals and grievances in accordance with this procedure shall not be disclosed by appeal and grievance panels, the Supervisory Body and or the secretariat without the prior written consent of the provider of the information. In this context, the following information shall not be considered as proprietary or confidential:</p> <p>(a) Information required to be disclosed by the national law of the host Party;</p>	<p>According to this paragraph, information used to support assessments on environmental and social impacts and contribution to sustainable development shall not be considered confidential. However, in the case of, for example, testimonies used as evidence to support assessments, these will contain sensitive and personal information. There should be a possibility for any information that is personal, or that can be traced to specific individuals, to be treated confidentially with the utmost regard for the protection of the grievant and others involved.</p>

	<p>(b) Information required to be disclosed by relevant provisions in the rules and regulations of the Article 6.4 mechanism;</p> <p>(c) Information used to support assessments on environmental and social impacts and contribution to sustainable development.</p>	
83	<p>The working language of the appeal and grievance mechanism shall be English. However, an appeal may be filed or a grievance may be submitted in any of the other five United Nations official languages. However, the Supervisory Body should coordinate with the DNA of the host Party of the A6.4 activity in question to explore approaches to facilitating the access to translation, including through funding for local translators.</p>	<p>In order to create an accessible appeals and grievance mechanism, it is imperative that English is not the only language in which an appeal or grievance can be filed. This will create an insurmountable barrier to those who do not master the English language, without access to funds for translation. We therefore welcome the addition of a provision to facilitate translation, however, this paragraph is vague and does not guarantee that translation facilities will be available to grievants for free. A more explicit guarantee in this paragraph is needed.</p>

Article 6.4 Appeal and Grievance Procedure: Lessons from the Green Climate Fund's Independent Redress Mechanism

The carbon market mechanism under Article 6.4 of the Paris Agreement has been inching closer to operationalisation, while essential elements of its design have yet to be decided on. One of the most important aspects to address for any carbon market mechanism is how it safeguards human rights - in Article 6.4, this is detailed in, among other elements, the Appeal and Grievance processes (AGP). [This draft document](#) for these processes is planned for adoption at the next meeting of the Article 6.4 Supervisory Body at the end of April, SB011.

Unfortunately, the current draft AGP is lacking in several fundamental areas of a robust grievance mechanism. The Independent Redress Mechanism (IRM) of the UN Green Climate Fund is an example of a robust grievance mechanism, as described in a [report](#) issued last year commissioned by Carbon Market Watch.

To illustrate the differences between the IRM and Article 6.4's AGP, the below table gives an overview of the different provisions offered to address grievances by either, in light of the UN Human Rights Council's "Guiding Principles on Business and Human Rights" (UNGPs) seven effectiveness criteria for grievance mechanisms: legitimacy, accessibility, predictability, equitability, transparency, rights compatibility, and being a source of continuous learning. Plus and minus signs indicate whether elements are positive or negative in relation to the criteria.

From this overview, the contrast with the IRM becomes clear: the Article 6.4 AGP performs significantly less well on all seven effectiveness criteria. These range from minor shortcomings to major barriers to an effective grievance mechanism. The Article 6.4 Supervisory Body must therefore urgently rethink its approach to this crucial component of the 6.4 mechanism, if it is to have any exemplary role in international carbon markets.

Criteria ¹	IRM ²	6.4AGP ³
<p>Legitimacy</p> <ul style="list-style-type: none"> • <i>enables trust from stakeholder groups for whose use they are intended</i> • <i>is accountable for the fair conduct of grievance processes</i> 	<ul style="list-style-type: none"> + There is a possibility to involve external legal consultations. + An independent review of the IRM will be undertaken every five years. 	<ul style="list-style-type: none"> – There is no possibility for external legal consultation. – There is no independent review of the mechanism foreseen. – The Supervisory Body can, at its discretion, decide not to undertake actions based on recommendations from the grievance panel.
<p>Accessibility</p> <ul style="list-style-type: none"> • <i>is known to all stakeholder groups for whose use they are intended</i> • <i>provides adequate assistance for those who may face particular barriers to access</i> 	<ul style="list-style-type: none"> + The mechanism is entirely free for grievants. + There are no formal requirements for a grievance: it can be filed through email, mail, toll-free hotline, voice or video call, message etc. + Submissions are allowed in all languages, and all documents and communication translated into local language. + There is a dedicated website with understandable information and a clearly visible access point on the homepage to file a complaint, including a brochure in 14 languages + There is a policy in place to actively seek out engagement with rights-holders. 	<ul style="list-style-type: none"> – Filing a grievance may not be free (fee of USD 5000 or 2500 per grievance, possibly with exceptions for some groups) – Grievances can only be filed through dedicated form answering specific questions. – Submissions are only allowed in English. – There is no dedicated website, the UNFCCC website is available in official UN languages but the AGP documents are only in English. – There are no provisions to seek out engagement with rights-holders (only passive engagement with rights-holders as part of the draft SD Tool). – Confidentiality is provided upon request, but not all information can be confidential.

¹ Based on the OHCHR's [Summary of ARP III Guidance](#), which is in turn based on the official Human Rights Council Decision [A/HRC/44/32](#)

² The following sources were used: [IRM website](#), [IRM ToR](#), [IRM Procedures and Guidelines](#), [GCF IP Policy](#), [GCF Gender Policy](#)

³ [A6.4-SB011-AA-A05](#) - Draft procedure: Appeal and grievance processes under the Article 6.4 mechanism

	<ul style="list-style-type: none"> + Confidentiality is provided upon request. + Grievances are possible up to two years after the fact. 	<ul style="list-style-type: none"> – Grievances are only eligible within the relevant activity cycle.
<p>Predictability <i>a clear and known procedure with an indicative time frame for each stage</i> • clarity on the types of process and outcome available and means of monitoring implementation</p>	<ul style="list-style-type: none"> + Regular updates on grievance status are given to grievants. + There is a stepwise description of the grievance process, with a timeframe for each step. + There is clear regulation for possible exceptions to timeframes. + The IRM ToR contains possible remedial outcomes. 	<ul style="list-style-type: none"> – No updates are given outside of the official process communication. + There is a stepwise description of the grievance process, with a timeframe for each step. – There are no provisions for exceptions to timeframes. + If additional information from the grievant is required, the grievance panel can decide on a deadline reasonable to prepare such additional information. – No possible remedial outcomes are given.
<p>Equitability • aggrieved parties have reasonable access to sources of information, advice, and expertise necessary to engage in a grievance process on a fair, informed, and respectful terms</p>	<ul style="list-style-type: none"> + Meetings take place at, including but not limited to, the site of the grievant. + The IRM bears all costs, including costs of ensuring the meaningful participation of complainants, witnesses and stakeholders in problem solving. + Developing countries can be reimbursed for costs associated with filing a request. + There is a possibility to provide supplementary information on eligibility during the eligibility determination. 	<ul style="list-style-type: none"> – No meetings are foreseen to take place. The only direct communication the grievant can have is, at the grievant's request, after the outcome has already been decided, one single call with the secretariat, along with the members of the grievance panel. – The 6.4 mechanism bears none of the costs that grievants may incur. + In case of incompleteness, there is a possibility to provide a revised form. – When the grievance is complete, there is no possibility to provide supplementary information.

<p>Transparency</p> <ul style="list-style-type: none"> • <i>keeps parties to a grievance informed about its progress</i> • <i>provides sufficient information about its performance to build confidence in its effectiveness and to meet any public interest at stake</i> 	<ul style="list-style-type: none"> + There is an online, publicly accessible, and up-to-date case repository. + Full disclosure on current and past staff is given. + All current and past documentation (surveys, reports, etc) is publicly available. 	<ul style="list-style-type: none"> + The secretariat publishes the outcome of the consideration of the grievance panel on the UNFCCC website. – Neither the secretariat staff nor roster of experts is made public. – No provisions are in place to make any supplementary documentation public.
<p>Rights compatibility</p> <ul style="list-style-type: none"> • <i>ensures that outcomes and remedies accord with internationally recognized human rights</i> 	<ul style="list-style-type: none"> + Retaliation safeguards are in place, and a retaliation brochure is available. + There is a dedicated policy for IPs, which contains specific provisions for grievances. + There is a dedicated gender policy, which contains specific provisions for grievances. 	<ul style="list-style-type: none"> – No retaliation safeguards are in place, nor is information on retaliation available. – There is no dedicated policy to align the grievance procedure with human rights.
<p>Source of continuous learning</p> <p><i>draws on relevant measures to identify lessons:</i></p> <ul style="list-style-type: none"> • <i>to improve the mechanism</i> • <i>to prevent future grievances and harms</i> 	<ul style="list-style-type: none"> + There are regulations in place to improve the mechanism, based on experiences and good practice. 	<ul style="list-style-type: none"> + The secretariat regularly organizes workshops with all experts on the roster to discuss relevant matters relating to the appeal and grievance processes. – No provisions are in place to foresee integrating improvements in the AGP.

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