From: Sinclair Vincent

Sent: Friday, September 27, 2024 11:12 PM

To: Jennifer Laughlin < >; A6.4mechanism-info < A6.4mechanism-

info@unfccc.int>

Subject: Re: Comments on Article 6.4 SD Tool

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Dear Article 6.4 Supervisory Body,

Oh behalf of Verra, I share our support for the comments from UNDP below.

Verra is revising the VCS Program's safeguard requirements to reflect the concepts described. In particular, we are moving toward a double materiality, risk-based approach to help projects identify the likelihood and severity of all relevant social and environmental risks. We are also developing guidance and requirements for the evidence needed to demonstrate that commensurate mitigation measures are in place to address each risk.

To restore and improve the integrity of the voluntary carbon market and Article 6.4 activities, we highly encourage all standards bodies to adopt a consistent approach to interpreting safeguard and sustainable development requirements. If we do not proceed consistently, we risk setting up a race to the bottom in which projects move toward the lowest standards.

Thank you for the work you have already put into the tool. We look forward to seeing the next version and remain available for further discussion should you wish to move forward in greater collaboration.

Best regards, Sinclair

Sinclair Vincent
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