

WOMEN * GENDER CONSTITUENCY

Submission from the Women and Gender Constituency (WGC) in response to the Call for Inputs to the Article 6.4 SBM ahead of its 21st meeting: Sustainable Development Tool

Name of submitter: Hwei Mian Lim

Organisation of the submitter: Women and Gender Constituency (WGC)

Email of submitter: Amy.lim.h.m@gmail.com

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

The Women and Gender Constituency (WGC) is one of the nine non-party stakeholder groups of the United Nations Framework Convention on Climate Change (UNFCCC). Established in 2009, the WGC now consists of 64 official members (women's and environmental civil society organisations accredited to the UNFCCC) and more than 1,000 advocacy networks (organisations and individuals), who are working together to ensure that human rights and gender equality are firmly anchored in all climate actions under the UNFCCC and to challenge the extractive, exploitative and patriarchal economic model which has resulted in the climate crisis.

The WGC welcomes the opportunity to respond to the call for input prior to the Article 6.4 SBM's 21st meeting from 18-21 May 2026. The WGC's inputs are related to the Sustainable Development Tool (SD tool). This submission comprised our general view on the SD Tool that is up for review this year, and our reflections on the specific sections and paragraphs in the draft SD tool (version 02.0).

General Comments

1. Relevant to Appendix 2: Technology, focusing on geoengineering

The precautionary principle, as per the Rio Declaration on Environment and Development must be adhered to with due diligence by the States. Geoengineering technologies (i.e., land-based, marine and solar) are mostly unproven and unprecedented in scale, complexity and financial costs with the risk of transboundary environmental harm. Therefore, if there is any scientific uncertainty, the geoengineering technology per se that could cause serious and irreversible damages and losses to the people, biodiversity and environment must not proceed.

The WGC strongly believes that policy coherence and alignment across the UN system is utmost important. Case in point, the Convention on Biological Diversity (CBD) reaffirmed in 2024 its longstanding moratorium on geoengineering deployment. The reaffirmation is timely in view of the aggressive push in recent years by the Global North countries and the private sector to promote and fund geoengineering technologies. This shows that there is a widespread recognition by some States of the potential for severe and irreversible harm to biodiversity. The WGC opined that the UNFCCC, especially the Article 6.4 mechanism, should align themselves with the CBD and uphold this moratorium on geoengineering deployment.

With the increase of geoengineering technologies incorporated or to be incorporated into mitigation actions (e.g., in the Article 6.4 Mechanism, REDD+ and other carbon offset schemes) the rights of the women and girls in all their diversity—particularly Indigenous women, Afrodescendant, peasants, migrants, women with disabilities and those from vulnerable populations—would be undermined or challenged. The affected rights are, among others, their right to health, right to food, right to clean water, right to land, right to self-determination and right to enjoy a safe, clean, healthy and sustainable environment as well as aspiration for gender equality and empowerment.

Additionally, the WGC believes that the rights of women and girls in all their diversity must take precedence over mitigation actions. Their rights to meaningful and active participation, decision-making, access to information, and access to justice and grievance must be promoted and carried out with due diligence. For the indigenous women and girls, the principle of FPIC must be carried out with due diligence prior to all mitigation actions.

Specific Comments

2. Addition of new criteria

We welcome the three new additional criteria, namely:

- i) [E2.2.6 \(para 42\) and AGQ2.2.3 on pest management](#), where for Article 6.4 activities involving pest management, the preferred approaches are the integrated pest management (IPM) and/or integrated vector management (IVM) and to reduce reliance on chemical pesticides. A Pest Management Plan will be developed in accordance with national and/or international best practices (e.g., IUCN Guidance Note for Pest Management Planning) when a significant volume of pesticides is foreseen.

Comment: We believe this encourages the utilisation of indigenous and local knowledge and practices of farming and forest management thus promoting real solutions from the grassroots, as well as adhering to the international best practices (e.g., IUCN Guidance Note). Evidence from the ground by the Asia Pacific Forum on Women, Law and Development (APWLD), a member of WGC, shows that for generations the Batin Sembilan Indigenous community, including their

women,¹ living in the Pangkalan Ranjau District, Indonesia, have been using Indigenous knowledge and practices for farming, fishing and forest management. Examples of farming practices are *beumo*, a form of shifting cultivation, and *nunu*, a traditional cooperative practice utilising controlled burning for planting paddy. Also, their indigenous farming methods prevent pest infestations and do not utilise chemical pesticides. In the cycle of shifting cultivation, they would apply several traditional techniques used to prevent pest attacks. Unlike modern farming practices, shifting cultivation does not rely on chemical inputs thus does not create soil dependence and contamination from chemical fertilisers that would damage the land and environment.

- ii) [E3.2.8 \(para 56\) and AGQ3.2.8 on genetically modified organisms/living modified organisms \(GMOs/LMOs\)](#)

Comment: For this item, we suggest that a clear binding language be used as proposed below:

For Article 6.4 activities that may involve the transfer, handling and use of GMOs/LMOs from modern biotechnology and that may have adverse effects on biological diversity, activity participants of the Article 6.4 activity shall carry out ~~are to ensure that~~ a risk assessment is carried out in accordance with Annex III of the Cartagena Protocol of Biosafety to the Convention on Biological Diversity.

- iii) [E6.4 \(para 76\) and ACG6.4 on chemical pesticides](#), where Article 6.4 activity prepares a Chemical Pesticides Management Plan that includes provisions for safe transport, storage, handling, and application and emergency situations, if applicable.

Comment: The use of chemical pesticides are known to affect the health, including reproductive health², of women and girls in all their diversity. Women workers, especially in the informal sector, are often exposed to multiple occupation health hazards. Evidence from the ground by APWLD shows that women cotton pickers in the Matiari District³--one of the major cotton producing districts in Sindh Province, Pakistan--experienced a major occupational health hazard due to chemical pesticides. Cotton growers would spray chemical pesticides on the crops. The growers also did not provide the women workers with protective equipment such as hand gloves and safety goggles. As such the women developed allergies, respiratory infections and various health problems. They would suffer from these ailments as they lack the access to health care treatment.

¹ <https://apwld.org/wp-content/uploads/2025/11/Real-Solutions-Now-Women-Lead-Climate-Action-APWLD-CJ-Regional-Analysis-2025.pdf>

² <https://www.cdc.gov/niosh/reproductive-health/prevention/pesticides.html>

³ <https://apwld.org/wp-content/uploads/2023/12/CJ-FPAR- REPORT FINAL .pdf>

3. New Tables 6 to 9

Comment: We noted the replacement of the old Table 3 with Tables 6 to 9, which provide better detailed examples for activity participants on how to develop activity-level SD indicators. We would like to suggest that a Table for SDG 5 (Gender equality) be included as well. The reason being most activity participants are not familiar with developing activity-level indicators related to SDG 5.

4. Appendix 2, paragraph 2 on reversal risk assessment

Comment: We welcome that the Article 6.4 Mechanism will develop a standardized reversal risk assessment tool to be used by all Article 6.4 activities participants. Before the reversal risk assessment tool is ready, carbon removal activities with technology readiness levels (TRL) eight or higher should not commence.

5. Appendix 2, paragraph 2(b)

“Identification of risks and potential negative impacts: taking account of potential receptors of released GHGs covered under the environmental and social safeguards elements 1, 2, 3, 5, 6 and 9 of the A6.4 SD tool, characterisation of potential GHG release events in terms of, inter alia, possible effects and impacts on ecosystems and societies in the project location and beyond under different scenarios;”

Comment: We are very concerned that elements 4 (Human Rights) and 7 (Gender equality) are left out. We believe that women and girls in all their diversity would be socially affected by the risks and potential negative impacts of potential GHG release events/reversal. Also, the human rights of the women and girls in all their diversity, Indigenous Peoples, local communities, and workers would be violated when they face potential risk and negative impacts due to reversal.

Our proposed text:

“Identification of risks and potential negative impacts: taking account of potential receptors of released GHGs covered under the environmental and social safeguards elements 1, 2, 3, 4, 5, 6, 7 and 9 of the A6.4 SD tool,...”.