



CDM Executive Board Call for Inputs on the Draft SD Tool

9 August 2012

International Rivers welcomes the opportunity to respond to the CDM Executive Board's call for public inputs on the design, substantive content and operational aspects of the draft development version (0.5) of the sustainable development voluntary tool (SD tool).¹ Our response reinforces the suggestions made by CDM Watch and includes specific aspects relating to the sustainable development of CDM hydropower projects:

- **International best practices and standards:** The no-harm safeguard should include an international standards category for projects to show that they have met international best practices and standards for environmental protection, public participation and indigenous rights. For hydropower projects in particular, this should include a requirement that all projects comply with the World Commission on Dams guidelines, and that a compliance report is made available to the public for verification.
- **Mandatory transparency, validation and verification requirements are essential:** Current options for sustainable development co-benefits reporting do not include possibilities to challenge statements given by project participants and there are no sanctions established if benefits are not delivered. Even voluntary guidelines should have mandatory transparency and validation and verification requirements. A good example of this is the Gold Standard.
- **Monitoring plan must be validated and verified:** Monitoring on sustainable development should be established in addition to monitoring emission reductions and included in the Project Design Document. The monitoring plan should then comply with safeguard criteria to ensure the project upholds human rights and, if applicable, it should also comply with all sustainable development indicators. Moreover, the submitted report should be forwarded to the stakeholders who were involved in the stakeholder consultations, so that they can certify the information. Finally, the report should be mandatorily validated and verified by the respective DOEs
- **Sustainable development benefits should be incentivized:** In order to strengthen the element of sustainable development in the CDM, which is a clear CDM mandate and one of the two requirements for all CDM projects, the sustainable development monitoring report should be a pre-requisite for CER issuance.
- **Wide-ranging public consultation on CDM tool:** Many experts in other related fields, e.g. the establishment of safeguards, participation requirements and MRV, have already been involved in creating similar tools and guidelines. It is essential to consult those experts for help for the design of this tool. In addition, other stakeholders, including

¹ http://cdm.unfccc.int/public_inputs/2012/eb69_04/index.html

communities affected by the project, should be able to raise their concerns through the questionnaire or challenge the information sent to the UNFCCC. The questionnaire should be make available in all host country languages.

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