

To whom it may concern,

Finnwatch expresses gratitude for the opportunity to once again provide input on the sustainable development tool of the article 6.4 mechanism (ref. A6.4-SB011-AA-A06).

We kindly ask you to reconsider clarifying the principle level question or the additional guiding questions under the principle 4 (“Human rights”) to explicitly refer to human rights. In our opinion, answering the principle level question and the three additional guiding questions in their current form does not provide clarity that existing or potential future risks to human rights have been sufficiently considered.

Thus, we propose either revising the principle level question to include the following, or alternatively adding a fourth additional guiding question:

“Does the activity participant undertake human rights due diligence to identify, prevent and mitigate actual or potential adverse human rights impact?”

It is of utmost importance that there is a question of this kind to ensure that the activity participant has an ongoing human rights due diligence process to identify and address not only existing, but also any future human right risks. If an activity participant just confirms that no risks have been identified, it may hinder participants willingness to identify or acknowledge any concerns raised in the future.

Kind regards,
Lasse Leipola
climate policy specialist