

Comments by the The Nature Conservancy on the Safeguards Policy of the International Climate Initiative

Handed in: 11th February 2022

Thank you for making the safeguards policy draft of IKI transparent. After participating in the consultation webinars on the safeguards policy draft, TNC would like to give its feedback on the proposed safeguards policy:

- Structure and clarity of procedure:
 - the structure and procedure is clear. The adherence to IFC Performance Standards as an international framework adds clarity.
 - Under the “exclusion criteria” it is mentioned some activities are considered high-risk, therefore excluded, and it is mentioned these are available online, however, it is not clear where? Is there a chance to include this information as part of these guidelines?
 - It is not clear where the funding for activities should come from to manage the Safeguards risks and IKI should make it more explicit that this should be budgeted in the project. For example tasks for safeguard measures should be included during the Application process. Should the BMUV recommend additional external input on safeguard assessment and/or measures are necessary during the application phase, then it would need to be incorporated in the project planning and budget.
- Differentiation of due diligence requirements according to the UN Guiding Principles on Business and Human Rights.
 - In general, the section is fairly clear. However, the section might benefit from further explanation of legal terms such as “best endeavours”.
- Complementarity with environmental and social standards of organizations (if any) implementing projects funded by the IKI.
 - The IKI Safeguards Policy does not contradict our own environmental and social standards.
- Dealing with safeguards violations or harm to the environment and people caused by project activities.
 - This is clear
- Regulations on transparency and stakeholder engagement, particularly with regard to the obligations of implementing organizations.
 - This is clear