

Application of the Oeko-Institut/WWF-US/ EDF methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website [Site terms and Privacy Policy](#) apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: www.carboncreditquality.org

Criterion:	6.1 Robustness of the carbon crediting program's environmental and social safeguards
Complementary Standard:	CCBS
Project type	Establishment of natural forests
Assessment based on complementary standard documents valid as of:	15 May 2022
Date of final assessment:	08 November 2022
Score:	3.61

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Assessment

Indicator 6.1.1

Relevant scoring methodology provisions

“The program requires the project owners to identify and mitigate potential negative environmental and social impacts, including to local and affected stakeholder wellbeing.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 1.1, page 3: “The Climate, Community & Biodiversity (CCB) Standards and the rules and requirements that operationalize them (collectively referred to as the CCB Program) were created to foster the development and marketing of projects that deliver credible and significant climate, community and biodiversity benefits in an integrated, sustainable manner. Projects that meet the Standards adopt best practices to deliver net positive benefits for climate change mitigation, for local communities and for biodiversity.”

Provision 2 Source 1, section 1.1, page 4: “ The CCB Program is beneficial to a variety of users, including:

Project Developers and Local Communities: Communities, NGOs, agencies and others use the CCB Program to guide the development of projects that deliver a suite of environmental and community benefits. Ensuring effective stakeholder engagement, good governance and holistic design to address social and environmental risks and opportunities helps to build a more sustainable project that can achieve multiple objectives. From an early stage, the Standards can be used to demonstrate a project’s high quality and multiple benefits of their project to potential investors and other stakeholders.”

Provision 3 Source 1, section CM.2 “Net positive community impacts”, page 35: “Concept.

The project generates net positive impacts on the well-being of communities and the community groups within them over the project lifetime. The project maintains or enhances the high conservation values in the project zone that are of importance to the well-being of communities.

Indicators.

- 1) Use appropriate methodologies to assess the impacts¹⁰⁰, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-

being due to project activities and an evaluation of the impacts by the affected community groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being of the community groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the communities (including water and soil resources), over the project lifetime.

- 2) Describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.

¹⁰⁰ Impacts' includes benefits, costs and risks, including those that are direct and indirect and including those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs. Note that the term 'benefits' refers to positive impacts and the phrase 'costs and risks' equates with negative impacts.

Provision 4 Source 1, section B2, page 43-44: "Concept.

The project generates net positive impacts on biodiversity within the project zone over the project lifetime. The project maintains or enhances any high conservation values present in the project zone that are of importance in conserving biodiversity. Native species¹²⁰ are used unless otherwise justified and invasive species¹²¹ and genetically modified organisms (GMOs)¹²² are not used.

Indicators.

- 1) Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the project zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.
- 2) Demonstrate that the project's net impacts on biodiversity in the project zone are positive, compared with the biodiversity conditions under the without-project land use scenario (described in B1).
- 3) Describe measures needed and taken to mitigate negative impacts on biodiversity and any measures needed and taken for maintenance or enhancement of the high conservation value attributes (identified in B1.2) consistent with the precautionary principle.
- 4) Demonstrate that no high conservation values (identified in B1.2) are negatively affected by the project.
- 5) Identify all species used by the project and show that no known invasive species are introduced into any area affected by the project and that the population of any invasive species does not increase as a result of the project.
- 6) Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease

introduction or facilitation. Justify any use of non-native species over native species.

- 7) Guarantee that no GMOs are used to generate GHG emissions reductions or removals.
- 8) Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.
- 9) Describe the process for identifying, classifying and managing all waste products resulting from project activities.”

Provision 5 Source 1, section 1.2, page 4: “Multiple-benefit standard: The CCB Program can be applied throughout the project’s life to verify the adoption of best practices and the delivery of social and environmental benefits of a land-based carbon project. The CCB Program can be combined very effectively with a carbon accounting standard such as, for example, the Clean Development Mechanism (CDM) or the Verified Carbon Standard (VCS). In this case, the Climate, Community & Biodiversity Standards provide a basis for evaluating a project’s social and environmental impacts while the carbon accounting standard enables verification and registration of quantified greenhouse gas emissions reductions or removals. In this way, the CCB Program is used to verify the social and environmental benefits generated by a project, enabling investors to select carbon credits with additional benefits, while screening out projects with unacceptable social and environmental impacts.”

Provision 6 Source 1, section 2, page 10: “The project has clear objectives to generate climate, community and biodiversity benefits¹² and is designed to meet these objectives.

¹² The project’s ‘climate benefits’ are defined as the GHG emissions reductions or removals resulting from project activities. The project’s ‘community benefits’ are defined as improvements in the well-being of communities resulting from project activities. The project’s ‘biodiversity benefits’ are defined as enhancement of elements of biodiversity resulting from project activities. All project benefits take into account positive and negative impacts and are relative to conditions under the without-project land use scenario described in G2.”

Provision 7 Source 1, section CM.1 “Without-project community scenario”, page 33: “Original well-being⁹¹ conditions for communities and expected changes under the without-project land use scenario are described.

⁹¹ Well-being’ is defined as people’s experience of the quality of their lives and may include environmental, social, economic, psychological, spiritual and medical dimensions. The improvement of well-being may include providing opportunity, ensuring and enhancing security and empowerment (see the World Bank’s attacking poverty framework adapted to REDD+, Lawlor, K., Madeira, E.M., Blockhus, J. and Ganz, D.J., 2013, Community Participation and Benefits in REDD+: A Review of Initial Outcomes and Lessons, Forests, 4(2), 296-318. available at: <http://www.mdpi.com/1999-4907/4/2/296>.)”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires that project developer use appropriate methodologies to assess the impacts resulting from project activities under the with-project scenario. This must include impacts on the “well-being of the community”, “biodiversity” as well as potential impacts of “changes in all ecosystem services” identified as important for the communities (Provision 3 and 4). It is assumed that the terms impacts on “well-being of the community” “biodiversity” and “changes in ecosystem services” are here used commensurate with the terms social and environmental impacts.

The standard’s purpose is to ensure net positive impacts of projects on community and biodiversity (Provision 1) by addressing social and environmental risks (Provision 2, 5 and 6). The well-being of communities is defined in the footnote of Provision 7. The standard’s provisions regarding negative environmental impacts focus on biodiversity and include not only negative impacts through invasive species or on biodiversity more broadly, but also negative impacts through wastes as well as “fertilizers, chemical pesticides, biological control agents and other inputs used for the project” (Provision 4). The standard also requires the description of measures to mitigate both social and environmental impacts (Provision 3 and 4). The indicator is therefore fulfilled.

Indicator 6.1.2

Relevant scoring methodology provisions

“The program clearly defines the types of environmental and social impacts that the project owners must identify and mitigate.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 1.3, page 6-7: “In 2010 in Cancun, Mexico, parties to the United Nations Framework Convention on Climate Change (UNFCCC) agreed on seven safeguards for the implementation of activities that reduce emissions from deforestation and forest degradation and contribute to conservation, sustainable management of forests and enhancement of forest carbon stocks (REDD+). These safeguards address transparency, participation of stakeholders, protection of biodiversity and ecosystem services, and respect for rights of indigenous and local communities. The Climate, Community & Biodiversity Standards are aligned with and help projects to demonstrate that they meet the UNFCCC REDD+ safeguards in all respects except the safeguard (b) relating to national forest governance structures, which is not applicable to the CCB Program given that it applies to the project level. The table below illustrates the relationship with Cancun safeguards.

UNFCCC REDD+ SAFEGUARDS

When undertaking [REDD+] activities, the following safeguards should be promoted and supported:

- a) Actions complement or are consistent with the objectives of national forest programmes and relevant international conventions and agreements;
- b) Transparent and effective national forest governance structures, taking into account national legislation and sovereignty;
- c) Respect for the knowledge and rights of indigenous peoples and members of local communities, by taking into account relevant international obligations, national circumstances and laws and noting that the United Nations General Assembly has adopted the United National Declaration on the Rights of Indigenous Peoples;
- d) The full and effective participation of relevant stakeholders, in particular indigenous peoples and local communities;
- e) Actions are consistent with the conservation of natural forests and biological diversity, ensuring that REDD+ activities are not used for the conversion of natural forests, but are instead used to incentivize the protection and conservation of natural forests and their ecosystem services, and to enhance other social and environmental benefits;
- f) Actions to address the risks of reversals;
- g) Actions to reduce displacement of emissions.”

UNFCCC safeguards	a	b	c	d	e	f	g
Climate, Community & Biodiversity Standards Third Edition	G5.6 partly (requires compliance only with national and local laws)	Not applicable	G5.1-3	G3.1-6, G5.2-3	B1-4, CM1-4	G1.10-11	CL3, CM3, B3

Provision 2 Source 1, section CM.1, page 33-34: “ Indicators.

- 1) Describe the communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics. Describe the social, economic and cultural diversity within the communities and the differences and interactions between the community groups.
- 2) Evaluate whether the project zone includes any of the following high conservation values (HCVs) related to community well-being and describe the qualifying attributes for any identified HCVs:
 - a) Areas that provide critical ecosystem services;
 - b) Areas that are fundamental for the livelihoods of communities; and

- c) Areas that are critical for the traditional cultural identity of communities.
 - d) Identify the areas that need to be managed to maintain or enhance the identified HCVs.
- 3) Describe the expected changes in the well-being conditions and other characteristics of Communities under the without-project land use scenario, including the impact of likely changes on all ecosystem services in the project zone identified as important to communities.”

Provision 3 Source 1, section CM.2, page 35: “Indicators.

- 1) Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being of the community groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the communities (including water and soil resources), over the project lifetime.
- 2) Describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.”

Provision 4 Source 1, section B2, page 43-44: “Indicators.

- 1) Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the project zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.
- 2) Demonstrate that the project’s net impacts on biodiversity in the project zone are positive, compared with the biodiversity conditions under the without-project land use scenario (described in B1).
- 3) Describe measures needed and taken to mitigate negative impacts on biodiversity and any measures needed and taken for maintenance or enhancement of the high conservation value attributes (identified in B1.2) consistent with the precautionary principle.
- 4) Demonstrate that no high conservation values (identified in B1.2) are negatively affected by the project.
- 5) Identify all species used by the project and show that no known invasive species are introduced into any area affected by the project and that the population of any invasive species does not increase as a result of the project.

- 6) Describe possible adverse effects of non-native species used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Justify any use of non-native species over native species.
- 7) Guarantee that no GMOs are used to generate GHG emissions reductions or removals.
- 8) Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.
- 9) Describe the process for identifying, classifying and managing all waste products resulting from project activities."

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 1 describes the safeguards that must be adhered to, which also include mitigation actions. Provision 2 and 3 describe the types of social impacts and provision 4 the types of environmental impacts from a biodiversity perspective. While addressing biodiversity makes sense as any negative environmental impacts (e.g. on water quality) will most likely impact the biodiversity of species or ecosystem and thus it is likely that all potential negative impacts are covered under the term "impacts on biodiversity", using biodiversity as a benchmark is also a very broad and complex approach. It can thus be a very ambitious undertaking for project owners to address all the indicators listed in Provision 4 and the list could have included also more basic impacts (e.g. on water pollution) to be sure that they are assessed. However, the types and the approach to assessing environmental impacts is clearly described. The indicator is therefore fulfilled.

Indicator 6.1.3

Relevant scoring methodology provisions

"The program requires the project owners to assign roles and responsibilities for managing environmental and social risks of the project."

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 2 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.5, page 8: “ROLES AND RESPONSIBILITIES.

2.5.1 Project proponents are the entities with overall control and responsibility for projects or programs that can demonstrate the legal right to control and operate the project (i.e., project ownership). A project may have one project proponent, or there may be a number of project proponents who collectively have overall control and responsibility for a project or program. If a project has multiple project proponents it must designate a primary project proponent that will serve as the point of contact between VCS and the project. Project proponents establish and operate projects and programs in accordance with the CCB rules. They are responsible for providing the project description, monitoring report and supporting documentation (including evidence of project ownership, the legal right to control and operate project activities) to facilitate validation and verification.”

Provision 2 Source 2, section G4., page 20: “Management capacity. Concept.

The project has adequate human and financial resources for effective implementation.

Indicators.

- 1) Describe the project’s governance structures and roles and responsibilities of all the entities involved in project design and implementation. For grouped projects, identify any new entities included in the project since the last CCB validation or verification.
- 2) Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team’s expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations are partnered with to support the project or have a recruitment strategy to fill the gaps.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 1 outlines the general responsibilities of project owners under the standard. Provision 2 further specifies that project owners need to describe the roles and responsibilities and necessary management capacity to deal with impact assessments.

Indicator 6.1.4

Relevant scoring methodology provisions

“The program assesses the institutional arrangements and capacities of the project owners to identify and manage the environmental and social risks associated with the project.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section G4., page 20: “Management capacity. Concept.

The project has adequate human and financial resources for effective implementation.

Indicators.

- 1) Describe the project's governance structures and roles and responsibilities of all the entities involved in project design and implementation. For grouped projects, identify any new entities included in the project since the last CCB validation or verification.
- 2) Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team's expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations are partnered with to support the project or have a recruitment strategy to fill the gaps.
- 3) Document the financial health of the implementing organization(s). Provide assurance that the project proponent and any of the other entities involved in project design and implementation are not involved in or are not complicit in any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion, and describe any measures needed and taken to be able to provide this assurance.”

Provision 2 Source 2, section 2.4, pages 14-15: “Management capacity.

2.4.1 Project Governance Structures (G4.1)

Describe the project's governance structures, and roles and responsibilities of all entities involved in project design and implementation.

For grouped projects, identify any new entities included in the project since the last CCB validation or verification.

2.4.2 Required Technical Skills (G4.2)

Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills.

2.4.3 Management Team Experience (G4.2)

Document the management team's expertise and prior experience implementing land management and carbon projects at the scale of this project.

2.4.4 Project Management Partnerships/Team Development (G4.2)

If relevant experience is lacking, demonstrate how other organizations are partnered with in order to support the project, or include a recruitment strategy by which the management team plans to fill any gaps.

2.4.5 Financial Health of Implementing Organization(s) (G4.3)

Document the financial health of the implementing organization(s) to ensure adequate financial support over the project lifetime.

2.4.6 Avoidance of Corruption and Other Unethical Behavior (G4.3)

Provide assurance that the project proponent and any other entities involved in the project design and implementation are not involved in, or complicit in, any form of corruption such as bribery, embezzlement, fraud, favoritism, cronyism, nepotism, extortion, and collusion. Describe any measures needed and designed to be able to provide this assurance."

Provision 3 Source 3, section 4.3, page 22: "Pre-Audit.

The project proponent, or its authorized representative, shall submit documents for public comment.

1) Projects using the CCB Program independent of the VCS Program shall submit the following documents to VCS via CCBStandards@v-c-s.org:

a) Prior to validation: draft project description, draft project description language summary (as necessary to meet the requirements set out in Sections 3.5.11 – 3.5.12)."

Provision 4 Source 3, section 4.3, page 24: "Validation and verification audits shall include a visit to the project site. The purpose of the site visit is to confirm the validity of the written project description or monitoring report and to ensure that the project meets the rules and requirements of the CCB Program. The on-site audit process normally includes interviews with project proponents and stakeholders, and a review of supporting records, documents and reports."

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires the project owners to document the capacities to carry out the project and the environmental and social impact assessments (Provision 1). This is reflected in the project description document, which specifically requires project developers to document the management team's expertise and prior experience implementing land management and carbon projects at the scale of the project (Provision 2). The project description is submitted for the validation process and checked by the VVB (Provision 3 and 4). The indicator is therefore fulfilled.

Indicator 6.1.5

Relevant scoring methodology provisions

"The program requires the project owners to identify and adhere to any national or local legal requirements which may be relevant to the project."

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 21: "The project is based on an internationally accepted legal framework, complies with relevant statutory and customary requirements and has necessary approvals from the appropriate state, local and indigenous authorities. The project recognizes respects and supports rights to lands, territories and resources, including the statutory and customary rights of Indigenous Peoples and others within communities and other stakeholders. The free, prior and informed consent (as described in G5.2) of relevant property rights holders has been obtained at every stage of the project. Project activities do not lead to involuntary removal or relocation of property rights holders from their lands or territories and do not force them to relocate activities important to their culture or livelihood. Any proposed removal or relocation occurs only after obtaining free, prior and informed consent from the relevant property rights holders."

Provision 2 Source 1, section G5, page 24: "Indicators.

Legal Status:

6) Submit a list of all national and local laws (69: *Local laws include all norms given by organisms of government whose jurisdiction is less than the national level, such as departmental, municipal and customary norms.*) and regulations in the host country that are relevant to the project activities. Provide assurance that the project is complying with these and, where relevant, demonstrate how compliance is achieved.

7) Document that the project has approval from the appropriate authorities, including the established formal and/or traditional authorities customarily required by the communities.

Provision 3 Source 1, section G3, page 20: “Indicators.

Worker Relations:

- 11) Submit a list of all relevant laws and regulations covering worker’s rights in the host country. Describe measures needed and taken to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 1 and 2 outline the requirements for the compliance with national and local laws. Provision 3 additionally sets the requirement for project owners to be in line with worker’s rights. The indicator is therefore fulfilled.

Indicator 6.1.6

Relevant scoring methodology provisions

“The program requires the disclosure of all relevant information from the project owner’s evaluation of environmental or social impacts. If an Environmental Impact Assessment is relevant or required to be carried out in the project’s local legal context, the assessment is fully disclosed (except for any confidential information that is not relevant to the conclusions of the assessment).”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 6.1.1, page 34: “The VCS project database provides the public interface to all CCB project information. It provides full transparency on project documentation and information on project proponents.”
- Provision 2 Source 1, section 6.1.4, page 34: “Final versions of project documents and validation/verification reports and statements are published on the VCS project database upon successful completion of a validation or verification (see Section 4.3.26).”

Provision 3 Source 1, section 3.5.1 Project description, page 14: “The project proponent shall prepare a project description (PD) that provides a detailed description of the project. The project description explains how the project has been designed, the ways in which the project meets each of the requirements of the Climate, Community & Biodiversity Standards, how the project will be implemented and how success in terms of climate, community and biodiversity benefits will be measured. The project proponent shall use one of the following documents:

- 1) Projects that are using the CCB Program independent of a recognized GHG program: the CCB Project Description Template.
- 2) Projects that are using the CCB Program together with a recognized GHG program: the combined project description template for that program (e.g., the CCB & VCS Project Description Template)”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires project owners to document their evaluation of environmental and social impacts (Indicator 6.1.1). These must be included in the CCB Project Description Template (Provision 3). All final versions of the project documents are publicly disclosed (Provision 1 and 2). The indicator is therefore fulfilled.

Indicator 6.1.7

Relevant scoring methodology provisions

“The program requires, at least for any potential negative impacts, that a validation and verification entity validates the evaluation of social and environmental impacts by the project owner prior to registration.”

Information sources considered

- 1 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 2 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.6.5 and 3.6.6, page 15: “Expected Community Impacts (CM2.1).

Describe the steps taken to validate the expected community impacts, including the key assumptions, rationale and methodological choices used to anticipate impacts on each community group resulting from project activities under the with-project

scenario. Include information with respect to how affected groups participated in estimating the impacts. Provide an overall conclusion regarding the expected impacts for each community identified in the project description.

3.6.6 Negative Community Impact Mitigation (CM2.2)

Describe the steps taken to validate the measures needed and designed to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of HCV attributes related to community well-being. Include information with respect to how such measures are consistent with the precautionary principle. Provide and justify an overall conclusion as to whether the project will mitigate negative impacts to communities.”

Provision 2 Source 1, section 3.8.4 and 3.8.5, page 18: “Expected Biodiversity Changes (B2.1)

Describe the steps taken to validate the key assumptions, rationale and methodological choices used to anticipate changes in biodiversity resulting from project activities under the with-project scenario. Provide and justify an overall conclusion regarding the expected impacts for each biodiversity element identified in the project description.

3.8.5 Mitigation Measures (B2.3)

Describe the steps taken to validate the measures needed and designed to mitigate negative impacts on biodiversity and any measures needed and designed for maintenance or enhancement of the HCV attributes. Include information with respect to how such measures are consistent with the precautionary principle.”

Provision 3 Source 2, section 4.3, page 24: “Validation and verification audits shall include a visit to the project site. The purpose of the site visit is to confirm the validity of the written project description or monitoring report and to ensure that the project meets the rules and requirements of the CCB Program. The on-site audit process normally includes interviews with project proponents and stakeholders, and a review of supporting records, documents and reports.”

Provision 4 Source 2, section 4.1, page 18-19: “Validation is the independent assessment of the project by a validation/verification body that determines whether the project design complies with the CCB rules. Verification is the periodic ex-post independent assessment by a validation/verification body of the climate, community and biodiversity impacts [..]. The project shall be validated and its implementation verified as set out in Diagram 2 below [..].”

Indicator 6.1.8

Relevant scoring methodology provisions

“The program requires a follow-up on any potential negative impacts identified in the evaluation of social and environmental impacts prior to registration, e.g., by including measures to mitigate any negative impacts in monitoring plans.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Monitoring Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section CM.2, page 35: “Indicators.

- 1) Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups. [..]
- 2) Describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.”

Provision 2 Source 1, section B2, page 43-44: “Indicators.

- 1) Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the project zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.
[..]
- 3) Describe measures needed and taken to mitigate negative impacts on biodiversity and any measures needed and taken for maintenance or enhancement of the high conservation value attributes (identified in B1.2) consistent with the precautionary principle.”

Provision 3 Source 2, section 4.1.2, page 17: “Negative Community Impact Mitigation (CM2.2).

Describe activities and/or processes implemented to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of high conservation value (HCV) attributes identified in the project description. Explain how such actions are consistent with the precautionary principle.

Provision 4 Source 2, section 5.1.2, page 19: "Mitigation Actions (B2.3).

Describe activities and/or processes implemented to mitigate negative impacts on biodiversity and any measures taken for maintenance or enhancement of the HCV attributes. Explain how such actions are consistent with the precautionary principle."

Assessment outcome

Yes (1 Point).

Justification of assessment

Measures to mitigate negative social and environmental impacts (Provision 1 and 2) need to be described by the project owners prior to registration (which is also reflected in Source 3). The standard requires that negative impacts receive a follow-up in the monitoring report which includes mitigation measures (Provision 3 and 4). The indicator is therefore fulfilled.

Indicator 6.1.9

Relevant scoring methodology provisions

"The program requires, at least for any potential negative impacts, that social and economic impacts be monitored throughout the crediting periods of the project."

Information sources considered

- 1 CCB Monitoring Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 2 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 3 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.1.2, page 17: "Negative Community Impact Mitigation (CM2.2).

Describe activities and/or processes implemented to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of high conservation value (HCV) attributes identified in the project description. Explain how such actions are consistent with the precautionary principle.

Provision 2 Source 1, section 5.1.2, page 19: "Mitigation Actions (B2.3).

Describe activities and/or processes implemented to mitigate negative impacts on biodiversity and any measures taken for maintenance or enhancement of the HCV attributes. Explain how such actions are consistent with the precautionary principle.”

Provision 3 Source 2, section CM4, page 38: “Indicators. [..]

Develop and implement a monitoring plan that identifies community variables¹⁰⁶ to be monitored, communities, community groups and other stakeholders to be monitored, the types of measurements, the sampling methods and the frequency of monitoring and reporting.¹⁰⁷ [..] Monitoring must assess differentiated impacts, including and benefits, costs and risks, for each of the community groups and must include an evaluation by the affected community groups.

¹⁰⁶ Potential variables may include but are not limited to: income, employment generation, health, market access, schools, food security and education.

¹⁰⁷ The following manual is recommended for guidance on appropriate monitoring methodologies: Richards, M. and Panfil, S.N. 2011,[..].”

Provision 4 Source 2, section B4, page 46: “Develop and implement a monitoring plan that identifies biodiversity variables¹²⁶ to be monitored, the areas to be monitored, the sampling methods and the frequency of monitoring and reporting.¹²⁷ Monitoring variables must be directly linked to the project’s biodiversity objectives and to predicted activities, outcomes and impacts identified in the project’s causal model related to biodiversity (described in G1.8).

¹²⁶ Potential variables may include but are not limited to: species abundance; population size, range, trends and diversity; habitat area, quality and diversity; landscape connectivity; and forest fragmentation.

¹²⁷ The following manual is recommended for guidance on appropriate monitoring methodologies: Richards, M. and Panfil, S.N. 2011, Social and Biodiversity Impact Assessment (SBIA) Manual for REDD+ Projects [..].”

Provision 5 Source 3, section 2.1, page 10: “2.1.9 Climate, Biodiversity and Community Benefits Assessment Period (G1.9)

Indicate the time period over which changes in GHG emissions, climate change adaptive capacity and resilience, biodiversity and community well-being resulting from project activities are monitored.

2.1.10 Differences in Assessment Periods (G1.9)

Explain and justify any differences between the GHG emissions accounting, climate adaptive capacity and resilience, community, and/or biodiversity assessment periods.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Environmental and social impacts need to be monitored (Provision 3 and 4). The standard requires that negative impacts receive a follow-up in the monitoring report, which includes mitigation measures (Provision 1 and 2). Project owners are required to describe the monitoring period of GHG emissions and climate and biodiversity impacts in the project description (Provision 5). If there are differences between the GHG emissions monitoring periods and the environmental and social impact monitoring, these have to be explained and justified (Provision 5). Project owners can thus only use the CCBS label for carbon credits that originate from crediting periods coinciding with the certification period for the CCBS during which requirements to monitor (negative) social and environmental impacts apply. If monitoring of social and environmental impacts stops, then the CCBS labelling of carbon credits would also stop. The indicator is therefore fulfilled.

Indicator 6.1.10

Relevant scoring methodology provisions

The program requires the project owners to establish an environmental and social management plan, at least for projects that the program classifies as having high environmental and social risks.

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The provisions do not include a requirement to explicitly set up an environmental and social management plan for projects with high risks. The indicator is therefore not fulfilled.

Indicator 6.1.11

Relevant scoring methodology provisions

“The program has a grievance mechanism in place that allows local stakeholders to submit grievances throughout the lifetime of the project without any barriers (e.g. liability for expenses associated with the investigation). Such grievances must be duly considered by the carbon crediting program.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 7, page 35: “Project proponents, validation/verification bodies and other stakeholders may submit enquiries to the VCS at any time. In addition, the CCB Program provides a complaints procedure and an appeals procedure.

All expenses, internal and external, incurred by VCS in handling complaints and appeals shall be paid by the entity filing the complaint or appeal. Prior to initiation of the handling process, the VCS will inform the entity filing the complaint or appeal of its estimated handling cost. Where the outcome of a complaint or appeal is to overturn an earlier decision made by the VCS, the entity filing the complaint or appeal will not be liable for covering such expenses.

7.1 Complaints.

7.1.1 A complaint is an objection to a decision taken by the VCS or an aspect of how it operates the CCB Program, or a claim that the CCB rules have had an unfair, inadvertent or unintentional adverse effect. Project proponents and other stakeholders are provided with the following complaints procedure:

- 1) The complaint shall include the following information:

- a) Name of the complainant.
- b) Name of organization, if relevant.
- c) Contact information for the complainant.
- d) Details of the complaint.
- e) Declaration of any conflict of interest in submitting the complaint.

- 2) The complaint shall be addressed to the CCB Program Manager and emailed to CCBStandards@v-c-s.org with the word complaint in the subject line. An email response is provided to the complainant from the VCS acknowledging receipt of the complaint.

3) The VCS appoints an appropriate person to handle the complaint, who will organize an analysis (involving external experts, as required) and determine any appropriate action required.

4) The VCS prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the VCS CEO.

5) All information submitted by the complainant with respect to the complaint is kept confidential by the VCS.”

Provision 2 Source 1, section 4.6, page 29-30: “4.6.1 Comments are information relevant to past, present or future validations or verifications about whether the project, especially as represented in documentation posted on the VCS project database, meets the rules and requirements of the CCB Program. Some comments may be categorized as complaints (e.g., those comments that are objections or dissatisfactions relating to the activities of projects that may lead to the suspension of a project’s CCB validated or verified status and/or to an approved validation/verification body status; see Section 7.1 Complaints).”

Provision 3 Source 1, section 4.6, page 31, “Public Comment Period”: “4.6.10 Comments received outside an audit period are sent to the validation/verification body that conducted the previous CCB validation or verification and to the project proponent. These comments are not published by the VCS but the commenter is informed by the VCS that comments resubmitted during the next public comment period will be published and shall be addressed in the validation or verification report.

Comments received outside an audit period are also compiled by the VCS and sent to the next validation/verification body that is engaged for a validation or verification for the project proponent, who may request information from the project proponent about how comments received outside the audit period have been addressed.”

Assessment outcome

No (0 Points).

Justification of assessment

The standard has a complaints and appeals policy that sets out the procedure and rules for submitting complaints to the program responsible for the standard (VCS). Upon receipt of a complaint, the program appoints an appropriate person to handle the complaint, and afterwards prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the Verra CEO (Provision 1). Upon communication with the standard, it was made clear that the grievance procedure in Provision 1 can be used by any stakeholder to submit grievances throughout the lifetime of the project. This is also indicated by the reference to Provision 1 in Provision 2, where comments received within and outside the public comment or audit period (Provision 3) can be categorized as complaints and are then to be handled as complaints in the “complaints” section in Provision 1. It remains slightly unclear if the last sentence in Provision 2 actually means that all comments, which are categorized as complaints, are handled

via the procedure in Provision 1. The program provisions could though be clarified in this aspect. Complainants must bear the cost of the complaint if it does not result in overturning an earlier decision made by VCS (Provision 1). The latter is considered a considerable barrier (as per the indicator) for accessing the grievance mechanism as for example the capacity of vulnerable local people bearing the cost of such a complaint procedure might be low. The indicator is therefore not fulfilled.

Indicator 6.1.12

Relevant scoring methodology provisions

“The program requires that project owners have a culturally appropriate grievance mechanism in place for local stakeholders to submit grievances to them throughout the lifetime of the project. Such grievances must be duly considered by the project owner.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 18-19: “Feedback and Grievance Redress Procedure.

8) Demonstrate that a clear grievance redress procedure has been formalized to address disputes with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation.

The project shall include a process for receiving, hearing, responding to and attempting to resolve grievances within a reasonable time period. The feedback and grievance redress procedure shall take into account traditional methods that communities and other stakeholders use to resolve conflicts.

The feedback and grievance redress procedure shall have three stages with reasonable time limits for each of the following stages.

First, the project proponent shall attempt to amicably resolve all grievances and provide a written response to the grievances in a manner that is culturally appropriate.

Second, any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.

Third, any grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party’s ability to submit the grievance to a competent supranational adjudicatory body, if any.

The feedback and grievance redress procedure must be publicized and accessible to communities and other stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires project owners to set up a culturally appropriate grievance mechanisms and prescribes the steps that need to be taken to consider all the grievances received (Provision 1). The indicator is therefore fulfilled.

Indicator 6.1.13

Relevant scoring methodology provisions

“The program requires that the grievance mechanism to be established by the project owners provide the possibility of providing anonymous grievances.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 18-19: “Feedback and Grievance Redress Procedure.

Demonstrate that a clear grievance redress procedure has been formalized to address disputes with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation.

The project shall include a process for receiving, hearing, responding to and attempting to resolve grievances within a reasonable time period. The feedback and grievance redress procedure shall take into account traditional methods that communities and other stakeholders use to resolve conflicts.

The feedback and grievance redress procedure shall have three stages with reasonable time limits for each of the following stages.

First, the project proponent shall attempt to amicably resolve all grievances and provide a written response to the grievances in a manner that is culturally appropriate.

Second, any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.

Third, any grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the grievance to a competent supranational adjudicatory body, if any.

The feedback and grievance redress procedure must be publicized and accessible to communities and other stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available.”

Assessment outcome

No (0 Points).

Justification of assessment

The provisions for grievance mechanisms of project owners does not include the possibility to submit anonymous grievances. The indicator is therefore not fulfilled.

Indicator 6.1.14

Relevant scoring methodology provisions

“The program requires that grievances received by the carbon crediting program and/or the project owners must be responded to within a specific response time.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 18-19: “Feedback and Grievance Redress Procedure.

Demonstrate that a clear grievance redress procedure has been formalized to address disputes with communities and other stakeholders that may arise during project planning, implementation and evaluation with respect but not limited to, free, prior and informed consent, rights to lands, territories and resources, benefit sharing and participation.

The project shall include a process for receiving, hearing, responding to and attempting to resolve grievances within a reasonable time period. The feedback and grievance redress procedure shall take into account traditional methods that communities and other stakeholders use to resolve conflicts.

The feedback and grievance redress procedure shall have three stages with reasonable time limits for each of the following stages.

First, the project proponent shall attempt to amicably resolve all grievances and provide a written response to the grievances in a manner that is culturally appropriate.

Second, any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.

Third, any grievances that are not resolved through mediation shall be referred either to a) arbitration, to the extent allowed by the laws of the relevant jurisdiction or b) competent courts in the relevant jurisdiction, without prejudice to a party's ability to submit the grievance to a competent supranational adjudicatory body, if any.

The feedback and grievance redress procedure must be publicized and accessible to communities and other stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available."

Provision 2 Source 2, section 7, page 35: "Project proponents, validation/verification bodies and other stakeholders may submit enquiries to the VCS at any time. In addition, the CCB Program provides a complaints procedure and an appeals procedure. [..]"

7.1 Complaints.

7.1.1 A complaint is an objection to a decision taken by the VCS or an aspect of how it operates the CCB Program, or a claim that the CCB rules have had an unfair, inadvertent or unintentional adverse effect. Project proponents and other stakeholders are provided with the following complaints procedure:

1) The complaint shall include the following information:

- a) Name of the complainant.
- b) Name of organization, if relevant.
- c) Contact information for the complainant.
- d) Details of the complaint.
- e) Declaration of any conflict of interest in submitting the complaint.

2) The complaint shall be addressed to the CCB Program Manager and emailed to CCBStandards@v-c-s.org with the word complaint in the subject line. An email response is provided to the complainant from the VCS acknowledging receipt of the complaint.

3) The VCS appoints an appropriate person to handle the complaint, who will organize an analysis (involving external experts, as required) and determine any appropriate action required.

4) The VCS prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the VCS CEO.

Assessment outcome

No (0 Points).

Justification of assessment

Grievances received by the project owners must be “resolve[d] [...] within a reasonable time period” (Provision 1) but the provisions for project owners do not include specific response times. There is also no specific response time given for grievances submitted to the program (Verra) (Provision 2). The indicator is therefore not fulfilled.

Indicator 6.1.15

Relevant scoring methodology provisions

“The program requires the project owners to conduct an assessment of which local stakeholders will be impacted by the project.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section CM1, page 33: “Describe the communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics.⁹² Describe the social, economic and cultural diversity within the communities and the differences and interactions between the community groups.

⁹² Community characteristics may include shared language, mythology, history, culture, livelihood systems, traditional authority structures, institutions, practices, values, relationships with specific sites of historical, cultural or spiritual significance, relationships with natural resources, or the customary institutions and rules governing the use of resources and sites.”

Provision 2 Source 1, section CM.2, page 35: “Indicators.

Use appropriate methodologies to assess the impacts, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups.”

Provision 3 Source 1, section G.1, page 10: “Project Design and Boundaries:

5) Explain the process of stakeholder identification²⁰ and analysis used to identify communities,²¹ community groups²² and other stakeholders.²³

6) List all communities, community groups and other stakeholders identified using the process explained in G1.5.

²⁰ Stakeholder identification and analysis should include an assessment of rights, interests and relevance to the project for each stakeholder group. The following manual can be used for guidance on stakeholder identification and analysis: Richards, M. and Panfil, S.N. 2011, Social and Biodiversity Impact Assessment (SBIA) Manual for REDD+ Projects: Part 1 – Core Guidance for Project Proponents. Climate, Community & Biodiversity Alliance, Forest Trends, Fauna & Flora International and Rainforest Alliance. Washington, DC (available at: <http://www.v-c-s.org/project/ccb-program/guidance/>).

²¹ ‘Communities’ are defined as all groups of people—including Indigenous Peoples, mobile peoples and other local communities—who derive income, livelihood or cultural values and other contributions to well-being from the project area at the start of the project and/or under the with-project scenario. In cases where numerous small communities can be shown to have homogeneous patterns of social organization, political structure and livelihoods, these communities may be identified and listed as a community. In identification of communities, it is permitted to consider significance of user populations and of their level of use such that distant or intermittent user groups who have very limited dependence on the site need not be defined as communities.

²² ‘Community groups’ are sub-groups of communities whose members derive similar income, livelihood and/or cultural values and other contributions to well-being from the project area and whose values are different from those of other groups; such as Indigenous Peoples, women, youth or other social, cultural and economic groups. The number of appropriate groups will depend on the size and complexity of the community. ‘Indigenous Peoples’ are defined as distinct social and cultural groups whose members identify themselves as belonging to an indigenous cultural group.

²³ ‘Other stakeholders’ are defined as all groups other than communities who can potentially affect or be affected by the project activities and who may live within or outside the project zone.

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires that affected stakeholders are identified and described (Provision 1, 2 and 3). The indicator is therefore fulfilled.

Indicator 6.1.16

Relevant scoring methodology provisions

“In assessing which local stakeholders will be impacted by the project, the program explicitly requires, at least for projects affecting land use, that the project owners identify local stakeholders that hold any legal or customary tenure or access rights to the land.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 21:” Respect for Rights to Lands, Territories and Resources and Free, Prior and Informed Consent.

Describe and map statutory and customary tenure/use/access/management rights to lands, territories and resources in the project zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and taken by the project to help to secure statutory rights. Demonstrate that all property rights are recognized, respected and supported.”

Provision 2 Source 1, section CM1, page 33: “Describe the communities at the start of the project and significant community changes in the past, including well-being information, and any community characteristics.⁹² Describe the social, economic and cultural diversity within the communities and the differences and interactions between the community groups.

⁹² Community characteristics may include shared language, mythology, history, culture, livelihood systems, traditional authority structures, institutions, practices, values, relationships with specific sites of historical, cultural or spiritual significance, relationships with natural resources, or the customary institutions and rules governing the use of resources and sites.”

Provision 3 Source 1, section CM.2, page 35: “Indicators.

Use appropriate methodologies to assess the impacts¹⁰⁰, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being¹⁰² of the community groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the communities (including water and soil resources), over the project lifetime

¹⁰⁰ Impacts' includes benefits, costs and risks, including those that are direct and indirect and including those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs. Note that the term 'benefits' refers to positive impacts and the phrase 'costs and risks' equates with negative impacts.

¹⁰² Restricting the evaluation to well-being based on activities that comply with statutory laws or conform with customary rights."

Provision 4 Source 2, section 2.1.6, page 9: "Stakeholder Identification (G1.5)

Explain the process of stakeholder identification and analysis, which should include an assessment of rights, interests and relevance to the project, used to identify communities, community groups within them, and other stakeholders."

Assessment outcome

Yes (1 Point).

Justification of assessment

Generally, the standard requires that "statutory and customary tenure/use/access/management rights to lands, territories and resources in the project zone" are described and identified (Provision 1). These aspects are also considered during the identification of stakeholders (Provision 2 and 4) and during the assessment of impacts (Provision 3). The indicator is therefore fulfilled.

Indicator 6.1.17

Relevant scoring methodology provisions

"The program requires the project owners to conduct a local stakeholder consultation in a way that is inclusive and culturally appropriate for local communities (taking into account, e.g., literacy, culture and language)."

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 17: "Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values.

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. Consultations must be gender and inter-generationally sensitive with special attention to vulnerable and/or marginalized people and must be conducted at mutually agreed locations and through representatives who are designated by the groups themselves in accordance with their own procedures. Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. Consultations must include participatory identification of ecosystem services important for communities and high conservation values, for example through participatory mapping. Consultations must also include an evaluation of the type and magnitude of impacts resulting from project activities (CM2.1). Consultations must also include a participatory design of feedback and grievance redress procedures (G3.8).”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires consultations to be culturally appropriate and that stakeholders are engaged in a way appropriate to them with a special attention to vulnerable and/or marginalized people (Provision 1). The indicator is fulfilled.

Indicator 6.1.18

Relevant scoring methodology provisions

“The program requires that the local stakeholder consultation be conducted before the decision of the project owners to proceed with the project and before the validation of the project.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 17: “Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input.⁴⁵

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. [...] Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. [...].

⁴⁵ In cases where it is unclear whether a project will be implemented or not, it is acceptable to start with preliminary consultations, provided there are plans for appropriate full consultations before the start of the project. Where conformance with the Climate, Community & Biodiversity Standards is being applied to a project already under implementation, project proponents must either provide documentation of appropriate consultations during the project design phase or demonstrate how more recent consultations have been effective in evaluating community benefits and adapting project design and implementation to optimize community and other stakeholder benefits and respect local customs.”

Provision 2 Source 2, section 3.3.5; page 9: “Stakeholder Consultations (G3.4).

Describe the steps taken to validate the project’s method(s) for conducting effective consultation to fulfil the requirements of G3.4. Provide and justify an overall conclusion regarding the project’s method(s) for conducting effective stakeholder consultations.”

Provision 3 Source 3, section 4.1, page 18: “Validation is the independent assessment of the project by a validation/verification body that determines whether the project design complies with the CCB rules. [...]”

have to consult stakeholders if any further changes to the project design occur after the initial posting for validation public comment. As part of the validation process, the stakeholder consultations are reviewed and thus have to be conducted before validation (Provision 2 and 3). The requirement to conduct the stakeholder consultations before submission of the PDD does however not constitute a requirement to conduct the stakeholder consultations before the decision to proceed with the project as there are no time restrictions on when a PDD can be submitted. The CCBS can for example also be obtained by an already existing project (Provision 1). The indicator is therefore not fulfilled.

Indicator 6.1.19

Relevant scoring methodology provisions

“The program requires the project owners to take due account of any input received in the local stakeholder consultation and to publicly document how inputs received are addressed.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 17: “4) Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input.⁴⁵

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. [...] Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. [...].

⁴⁵ In cases where it is unclear whether a project will be implemented or not, it is acceptable to start with preliminary consultations, provided there are plans for appropriate full consultations before the start of the project. Where conformance with the Climate, Community & Biodiversity Standards is being applied to a project already under implementation, project proponents must either provide documentation of appropriate consultations during the project design phase or demonstrate how more recent consultations have been effective in evaluating community benefits and adapting project design and implementation to optimize community and other stakeholder benefits and respect local customs.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires project owners to document the consultations in the publicly available project description (Source 2) and if any inputs from consultations influenced the project design and if so, how they influenced the project design and implementation (Provision 1). The indicator is therefore fulfilled.

Indicator 6.1.20

Relevant scoring methodology provisions

“The program requires that a validation and verification entity assesses whether the project owners have taken due account of all inputs received in the local stakeholder consultation.”

Information sources considered

- 1 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 2 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.3, page 9: “3.3.5 Stakeholder Consultations (G3.4).

Describe the steps taken to validate the project’s method(s) for conducting effective consultation to fulfil the requirements of G3.4. Provide and justify an overall conclusion regarding the project’s method(s) for conducting effective stakeholder consultations.

3.3.6 Stakeholder Consultation Channels (G3.5)

Identify, discuss, and justify conclusions regarding the stakeholder consultation channels used by the project proponent to fulfil G3.5, considering especially the project proponent’s justification that adequate levels of information sharing occurred.

3.3.7 Stakeholder Participation in Decision-Making and Implementation (G3.6)

Identify, discuss and justify conclusions on the measures needed (and taken, if appropriate) by the project proponent to enable effective participation in culturally appropriate and gender sensitive manner with all communities and describe the steps taken to validate them. Include details of documentation assessed and observations made during the site visit.”

Provision 2 Source 2, section G3, page 17: “4) Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input.⁴⁵

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. [...] Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. [...].

⁴⁵ In cases where it is unclear whether a project will be implemented or not, it is acceptable to start with preliminary consultations, provided there are plans for appropriate full consultations before the start of the project. Where conformance with the Climate, Community & Biodiversity Standards is being applied to a project already under implementation, project proponents must either provide documentation of appropriate consultations during the project design phase or demonstrate how more recent consultations have been effective in evaluating community benefits and adapting project design and implementation to optimize community and other stakeholder benefits and respect local customs.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires VVB to check whether an effective consultation (according to section G3.4 of the standard document (Source 2)) was conducted by the project owners (Provision 1). The respective section in Source 2 require project owners to document how inputs were taken into account as part of the effective consultation (Provision 2). The indicator is therefore fulfilled.

Indicator 6.1.21

Relevant scoring methodology provisions

“The program requires that project owners make key information on the project available to local stakeholders prior to conducting the local stakeholder consultation, such as the project design documents and any supplemental project documentation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 16:” “Access to Information.

- 1) Describe how full project documentation⁴⁰ has been made accessible to communities and other stakeholders, how summary project documentation⁴¹ (including how to access full documentation) has been actively disseminated to communities in relevant local or regional languages and how widely publicized information meetings have been held with communities and other stakeholders.
- 2) Explain how relevant and adequate information about potential costs, risks and benefits⁴² to communities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project.

⁴⁰ Includes project description and monitoring reports, as they become available, through the project lifetime.”

Provision 2 Source 1, section G3, page 17: “Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values.

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. Consultations must be gender and inter-generationally sensitive with special attention to vulnerable and/or marginalized people and must be conducted at mutually agreed locations and through representatives who are designated by the groups themselves in accordance with their own procedures. Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. Consultations must include participatory identification of ecosystem services important for communities and high conservation values, for example through participatory mapping. Consultations must also include an evaluation of the type and magnitude of impacts resulting from project activities (CM2.1). Consultations must also include a participatory design of feedback and grievance redress procedures (G3.8).”

Assessment outcome

No (0 Points).

Justification of assessment

The standard requires that key information, including the project description, is made available to local stakeholders (Provision 1). It is also required that information on potential impacts is provided in a “timely manner”. While it is foreseen that stakeholders shall have the opportunity to “evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide

input on the project design” (Provision 2) in order to influence project design and implementation, it is not stated explicitly, that key documents will be shared before the consultations are conducted. This could be made clearer in the provisions. The indicator is thus considered to not be fulfilled.

Indicator 6.1.22

Relevant scoring methodology provisions

“The program requires free, prior and informed consent if indigenous, tribal or traditional people are directly affected by a project (e.g., in case of re-locations or where property rights or land inhabited or used by people is affected).”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 22-23: “Respect for Rights to Lands, Territories and Resources and Free, Prior and Informed Consent.

- 2) B) The free, prior and informed consent⁶³ has been obtained of those whose property rights are affected by the project through a transparent, agreed process.

Free, Prior and Informed Consent⁶⁴ is defined as:

Free means no coercion, intimidation, manipulation, threat and bribery;

Prior means sufficiently in advance of any authorization or commencement of activities and respecting the time requirements of their decision-making processes;

Informed means that information is provided that covers (at least) the following aspects

- i) The nature, size, pace, reversibility and scope of any proposed project or activity;
- ii) The reason/s or purpose of the project and/or activity;
- iii) The duration of the above;
- iv) The locality of areas that will be affected;
- v) A preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle;
- vi) Personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees and others); and
- vii) Procedures that the project may entail; and

Consent means that there is the option of withholding consent and that the parties have reasonably understood it.

Collective rights holders must be able to participate through their own freely chosen representatives and customary or other institutions following a transparent process for obtaining their Free, Prior and Informed Consent that they have defined.”

Provision 2 Source 1, section G5, page 21: “The project recognizes respects and supports rights to lands, territories and resources, including the statutory and customary rights of Indigenous Peoples and others within communities and other stakeholders.⁵⁹ The free, prior and informed consent (as described in G5.2) of relevant property rights holders has been obtained at every stage of the project.”

Assessment outcome

Yes (2 Points).

Justification of assessment

Free, prior and informed consent is defined and explicitly mentioned in the standard provisions (Provision 1). And it is required for all projects (Provision 1 and 2). The indicator is therefore fulfilled.

Indicator 6.1.23

Relevant scoring methodology provisions

“The program requires the project owners to establish mechanisms for ongoing communication with local stakeholders (e.g., periodic consultations) in a manner appropriate to the context of the stakeholders (e.g., literacy, culture and language) and take due account of input received.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 CCB Monitoring Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 17-18: “Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation

values. Project proponents must document consultations and indicate if and how the project design and implementation has been revised based on such input.⁴⁵ A plan must be developed and implemented to continue communication and consultation between the project proponents and communities, including all the community groups, and other stakeholders about the project and its impacts to facilitate adaptive management⁴⁶ throughout the life of the project. ”

Provision 2 Source 1, section G3, page 18: “Participation in Decision-making and Implementation

Describe the measures needed and taken to enable effective participation, as appropriate, of all communities, including all the community groups that want and need to be involved in project design, implementation, monitoring and evaluation throughout the project lifetime, and describe how they have been implemented in a culturally appropriate and gender sensitive manner.”

Provision 3 Source 2, section 2.3.8, page 13: “Continued Consultation and Adaptive Management (G3.4)

Describe how communication and consultation about the project has continued between the project proponent(s) and communities and other stakeholders. Explain the processes used throughout the life of the project to consider this input and how this communication and consultation has influenced the project through adaptive management.”

Provision 4 Source 3, section 2.2.8, page 12:” Continued Consultation and Adaptive Management (G3.4)

Describe how communication and consultation about the project has continued between the project proponent(s) and communities and other stakeholders. Explain the processes used throughout the life of the project to consider this input and how this communication and consultation has influenced the project through adaptive management.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires that project owners establish mechanisms for ongoing communication in a culturally appropriate manner (Provision 1 and 2) and describe the process foreseen for ongoing communication (Provision 3). It is required that project owner document in the monitoring report how inputs received have been considered and how this influenced the project (Provision 4). The indicator is therefore fulfilled.

Indicator 6.1.24

Relevant scoring methodology provisions

“The program requires that a record of how issues from local stakeholder consultations (6.1.18), grievances communicated to project owners (6.1.12) and ongoing communication (6.1.23) have been addressed is made publicly available or made available upon request.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Project Description Template. Version 3.0. Document issued 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section G3, page 19: “Feedback and Grievance Redress Procedure. [...] The feedback and grievance redress procedure must be publicized and accessible to communities and other stakeholders. Grievances and project responses, including any redress, must be documented and made publicly available.”
- Provision 2 Source 2, section 2.3.7, page 13: “Stakeholder Consultations (G3.4) Describe how communities including all the community groups and other stakeholders have influenced project design. Document consultations and indicate if and how project design and has been affected by stakeholder input.”
- Provision 3 Source 3, section 2.2.8, page 11: “Continued Consultation and Adaptive Management (G3.4) Describe how communication and consultation about the project has continued between the project proponent(s) and communities and other stakeholders. Explain the processes used throughout the life of the project to consider this input and how this communication and consultation has influenced the project through adaptive management.”
- Provision 4 Source 3, section 6.1.1, page 34: “The VCS project database provides the public interface to all CCB project information. It provides full transparency on project documentation and information on project proponents.”
- Provision 5 Source 3, section 6.1.4, page 34: “Final versions of project documents and validation/verification reports and statements are published on the VCS project database upon successful completion of a validation or verification (see Section 4.3.26).”

Assessment outcome

Yes (1 Point).

Justification of assessment

The documentation of grievances is made publicly available (Provision 1). The documentation of stakeholder consultations (Provision 2) and ongoing communication can be found in the project description and monitoring report which are publicly available (Provision 4 and 5). The indicator is therefore fulfilled.

Indicator 6.1.25

Relevant scoring methodology provisions

“The program requires project validation and verification entities to contact and engage with affected local stakeholders during validation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.3.13, page 24: “Validation and verification audits shall include a visit to the project site. The purpose of the site visit is to confirm the validity of the written project description or monitoring report and to ensure that the project meets the rules and requirements of the CCB Program. The on-site audit process normally includes interviews with project proponents and stakeholders, and a review of supporting records, documents and reports.”

Assessment outcome

No (0 Points).

Justification of assessment

The validation process “normally” includes interviews with stakeholders as a way to engage with stakeholders (Provision 1). Upon communication with the standard, it was clarified that if the validation did not include interviews, Verra will question how a positive validation was concluded without such interviews. However, this implies that the VVB do not necessarily need to engage with affected stakeholders. The provision could thus clarify what “normally” means and in which cases this requirement does not apply and what process might instead suffice. The phrasing questions the mandatory nature of this provision. The indicator is therefore not fulfilled.

Indicator 6.1.26

Relevant scoring methodology provisions

“The program requires that projects be subject to public consultation on the global level via online facilities (e.g., submitting comments on an online platform or portal) prior to project registration.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.6, page 30: “4.6.2 The public comment period is when members of the public are invited to submit comments to the VCS about whether the project meets the CCB rules and requirements. During the public comment period, comments are invited on, but not limited to, specific draft project documents on the VCS project database that are pertinent to an ongoing validation and/or verification audit. Comments may be submitted to the VCS in English, French, Spanish or Portuguese.

4.6.3 The public comment period shall last a minimum of 30 days, but the validation/verification body or project proponent, at their discretion and on agreement of both parties, can request a longer period of the VCS.

4.6.4 The public comment period should be completed before the start of the validation/verification body site visit, so that the validation/verification body may make appropriate enquiries onsite about any comments received. In the event that the public comment period ends after the site visit is complete, the validation/verification body shall give full consideration to any comments received and may need to return to the project site to do so.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Projects are subject to a 30-day public comment period prior to validation, and thus prior to registration (Provision 1). The public consultation is handled via the project database. The indicator is therefore fulfilled.

Indicator 6.1.27

Relevant scoring methodology provisions

“The program requires that global public consultations of projects make available key information on the project, such as the project design documents and any supplemental project documentation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.6, page 30: “4.6.2 The public comment period is when members of the public are invited to submit comments to the VCS about whether the project meets the CCB rules and requirements. During the public comment period, comments are invited on, but not limited to, specific draft project documents on the VCS project database that are pertinent to an ongoing validation and/or verification audit. Comments may be submitted to the VCS in English, French, Spanish or Portuguese.

4.6.3 The public comment period shall last a minimum of 30 days, but the validation/verification body or project proponent, at their discretion and on agreement of both parties, can request a longer period of the VCS.

4.6.4 The public comment period should be completed before the start of the validation/verification body site visit, so that the validation/verification body may make appropriate enquiries onsite about any comments received. In the event that the public comment period ends after the site visit is complete, the validation/verification body shall give full consideration to any comments received and may need to return to the project site to do so.”

Provision 2 Source 1, section 4.3, page 22: “4.3.4 The project proponent, or its authorized representative, shall submit documents for public comment.

1) Projects using the CCB Program independent of the VCS Program shall submit the following documents to VCS via CCBStandards@v-c-s.org:

- a) Prior to validation: draft project description, draft project description language summary (as necessary to meet the requirements set out in Sections 3.5.11 – 3.5.12).

[..]

2) Projects using both the CCB Program and the VCS Program shall submit the following documents to VCS via the VCS registry:

- a) Prior to validation: draft project description, draft project description language summary (as necessary to meet the requirements set out in Sections 3.5.11 – 3.5.12).

[..]

4.3.8 A CCB project record will be created on the VCS project database, as set out below, when validation documents are posted for public comment. [..]

4.3.9 VCS shall post draft project documents for a 30 day public comment and update the project status as follows: [..].”

Assessment outcome

Yes (1 Point).

Justification of assessment

For the public comment period, the project description and other project documents shall be made available on the VCS project database (Provision 1 and 2). The indicator is therefore fulfilled.

Indicator 6.1.28

Relevant scoring methodology provisions

“The program requires that input received through global public consultations of projects is publicly documented, that the project owners must take due account of the inputs received, and that it is publicly documented how inputs received are addressed.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 2 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.6, page 30: “4.6.5 The VCS collates and publishes any comments that it receives and sends them to the validation/verification body and the project proponent.

4.6.6 The validation/verification body shall acknowledge receipt of the comments from the VCS and assess how the project proponent has responded to the issues raised by public comments. The project proponents may respond to public comments through revisions to the project description/monitoring report or other documented efforts.”

Provision 2 Source 2, section 2.6, page 5: “Public Comments (Rules 4.6)

Summarize any public comments submitted during the public comment period. Assess whether the project proponent has taken due account of all and any comments, and provide an overall conclusion regarding public comments.

Describe how each comment was addressed by the project proponent through revisions to the project design or project monitoring report or other document efforts, and provide an assessment of the extent to which the project proponent’s responses are appropriate.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard uses the VCS project database for documenting comments received. The VCS, collects the public/global comments and sends the comments to the VVB and the project proponent (Provision 1). The project owner has to take due account of the comments received and it is documented in the validation report how this was done by the project owners and how this influenced the project design (Provision 2). Public/global comments are generally documented in the validation report (Provision 2, Source 2). The indicator is therefore fulfilled.

Indicator 6.1.29

Relevant scoring methodology provisions

“The program requires that a validation and verification entity assesses whether the project owners have taken due account of all inputs received in the global stakeholder consultation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 2 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 4.6, page 30: “4.6.5 The VCS collates and publishes any comments that it receives and sends them to the validation/verification body and the project proponent.

4.6.6 The validation/verification body shall acknowledge receipt of the comments from the VCS and assess how the project proponent has responded to the issues raised by public comments. The project proponents may respond to public comments through revisions to the project description/monitoring report or other documented efforts.”

Provision 2 Source 2, section 2.6, page 5: “Public Comments (Rules 4.6)

Summarize any public comments submitted during the public comment period. Assess whether the project proponent has taken due account of all and any comments, and provide an overall conclusion regarding public comments.

Describe how each comment was addressed by the project proponent through revisions to the project design or project monitoring report or other document efforts, and provide an assessment of the extent to which the project proponent’s responses are appropriate.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The VVB assesses and documents how inputs from the global consultation were addressed by the project owner (Provision 1 and 2). The indicator is therefore fulfilled.

Indicator 6.1.30

Relevant scoring methodology provisions

“The program has established provisions that allow the public (both global and local project stakeholders) to submit comments to the program about a project at any time during project operation. This includes provisions for the program’s due consideration of the comments received and possible action to address the concern (e.g., halting the issuance of credits, deregistering the project, or requiring compensation for over-issuance).”

Information sources considered

- 1 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 4.6, page 29-30: “4.6.1 Comments are information relevant to past, present or future validations or verifications about whether the project, especially as represented in documentation posted on the VCS project database, meets the rules and requirements of the CCB Program. Some comments may be categorized as complaints (e.g., those comments that are objections or dissatisfactions relating to the activities of projects that may lead to the suspension of a project’s CCB validated or verified status and/or to an approved validation/verification body status; see Section 7.1 Complaints).”
- Provision 2 Source 1, section 4.6, page 31: “ Comments Received Outside the Public Comment Period.
- 4.6.9 Comments received after a public comment period and before an audit is approved by the VCS are sent to the validation/verification body and project proponent but are not published by the VCS.
- 4.6.10 Comments received outside an audit period are sent to the validation/verification body that conducted the previous CCB validation or verification and to the project proponent. These comments are not published by the VCS but the commenter is informed by the VCS that comments resubmitted during the next public comment period will be published and shall be addressed in the validation or verification report.

4.6.11 Comments received outside an audit period are also compiled by the VCS and sent to the next validation/verification body that is engaged for a validation or verification for the project proponent, who may request information from the project proponent about how comments received outside the audit period have been addressed.

Provision 3 Source 1, section 7, page 35: “Project proponents, validation/verification bodies and other stakeholders may submit enquiries to the VCS at any time. In addition, the CCB Program provides a complaints procedure and an appeals procedure.”

Provision 4 Source 1, section 4.7, page 31: “Project proponents shall abide by the rules and requirements of the CCB Program, and the VCS reserves the right to suspend a project’s validated or verified status at any time, at its own discretion. The suspended project will remain in the VCS project database with any documentation that was submitted to VCS or CCBA with a clear notification in the CCB status that the project has been suspended along with the reason for the suspension. In the event that the VCS receives information that suggests that a project is failing to meet the rules and requirements of the CCB Program, suspension of the project will follow the VCS complaints and appeals procedure set out in Section 7.”

Provision 4 Source 1, section 7, page 35: “Project proponents, validation/verification bodies and other stakeholders may submit enquiries to the VCS at any time. In addition, the CCB Program provides a complaints procedure and an appeals procedure. [..]”

7.1 Complaints.

7.1.1 A complaint is an objection to a decision taken by the VCS or an aspect of how it operates the CCB Program, or a claim that the CCB rules have had an unfair, inadvertent or unintentional adverse effect. Project proponents and other stakeholders are provided with the following complaints procedure:

1) The complaint shall include the following information:

- a) Name of the complainant.
- b) Name of organization, if relevant.
- c) Contact information for the complainant.
- d) Details of the complaint.
- e) Declaration of any conflict of interest in submitting the complaint.

2) The complaint shall be addressed to the CCB Program Manager and emailed to CCBStandards@v-c-s.org with the word complaint in the subject line. An email response is provided to the complainant from the VCS acknowledging receipt of the complaint.

3) The VCS appoints an appropriate person to handle the complaint, who will organize an analysis (involving external experts, as required) and determine any appropriate action required.

4) The VCS prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the VCS CEO.

5) All information submitted by the complainant with respect to the complaint is kept confidential by the VCS.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard has provisions that describe the process of handling comments outside the global/public comment period (Provision 1 and 2). Comments can be submitted at any time during the project lifetime (Provision 3). Comments and information received in relation to project activities can lead to the suspension of projects or a change in their status (Provision 1 and 3) – these comments are categorized as complaints by the CCBS and are handled via the complaints procedure (Provision 4). While Provision 1 categorizes some comments on projects by stakeholders as complaints, the actual complaints procedure (Provision 4) is (literally) about complaints about the program rules themselves. The standard provisions could be clarified to extent the complaints procedure to comments from stakeholders about projects (see indicator 6.1.11). The indicator is nonetheless fulfilled.

Indicator 6.1.31

Relevant scoring methodology provisions

“The program provisions explicitly ban any violation of human rights by the project owner or any other entity involved in project design or implementation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 18: “Describe the measures needed and taken to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination⁴⁷ or sexual harassment with respect to the project.

⁴⁷ Including discrimination based on gender, race, religion, sexual orientation or other habits.”

Assessment outcome

No (0 Points).

Justification of assessment

The standard bans any form of discrimination, but does not explicitly ban any violation of human rights (Provision 1). Therefore, the indicator is considered not to be fulfilled.

Indicator 6.1.32

Relevant scoring methodology provisions

“The program has safeguards in place that require preserving and protecting cultural heritage in projects.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 21: “Project activities do not lead to involuntary removal or relocation of property rights holders from their lands or territories and do not force them to relocate activities important to their culture or livelihood.⁶⁰

⁶⁰ United Nations Human Rights Council, UN Declaration on the Rights of Indigenous Peoples, Article 10. ILO Convention 169, Article 16, 2008.

Provision 2 Source 1, section B1, page 41: “ Indicators.

2) Evaluate whether the project zone includes any of the following high conservation values (HCVs) related to biodiversity and describe the qualifying attributes for any identified HCVs:¹¹³

a) Globally, regionally or nationally significant concentrations of biodiversity values:

i) Protected areas¹¹⁴

[..]

3) Identify the areas that need to be managed to maintain or enhance the identified HCVs.

¹¹⁴ ‘Protected areas’ are defined as an area of land and/or sea especially dedicated to the protection and maintenance of biological diversity, and of natural and associated cultural resources, and managed through legal or other effective means equivalent to IUCN Protected Area Management Categories I-VI (see: <https://www.iucn.org/theme/protected-areas/about/protected-areas-categories> for definitions) as well as areas that have been proposed for protected area status by the relevant statutory body but have not yet been officially declared, and including areas protected under international conventions (e.g., Ramsar sites, World Heritage Sites, UNESCO Man-and-Biosphere Reserves, etc.). “

Provision 3 Source 1, section B2, page 43: “Indicators. [..]

- 3) Describe measures needed and taken to mitigate negative impacts on biodiversity and any measures needed and taken for maintenance or enhancement of the high conservation value attributes (identified in B1.2) consistent with the precautionary principle.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard requires that World Heritage sites and generally protected areas dedicated to the maintenance of biodiversity and associated cultural resources are identified, protected and maintained as they are categorized as protected areas (Provision 2 and 3). Any relocation of important cultural activities are banned (Provision 1). The indicator is therefore fulfilled.

Indicator 6.1.33

Relevant scoring methodology provisions

“The program has safeguards in place in relation to health that at least address the need to avoid or minimize the risks and impacts to (community) health, safety and security that may arise from projects.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 [CCBS Project Description Template, CCB Version 3. Online available at: https://verra.org/programs/ccbs/ccbs-program-details/](https://verra.org/programs/ccbs/ccbs-program-details/)

Relevant carbon crediting program provisions

Provision 1 Source 1, section CM1, page 33: “Concept

Original well-being⁹¹ conditions for communities and expected changes under the without-project land use scenario are described.

⁹¹ Well-being’ is defined as people’s experience of the quality of their lives and may include environmental, social, economic, psychological, spiritual and medical dimensions. The improvement of well-being may include providing opportunity, ensuring and enhancing security and empowerment (see the World Bank’s attacking poverty framework adapted to REDD+, Lawlor, K., Madeira, E.M., Blockhus, J. and Ganz, D.J., 2013, Community Participation and Benefits in REDD+: A Review of Initial Outcomes and Lessons, *Forests*, 4(2), 296-318. available at: <http://www.mdpi.com/1999-4907/4/2/296>.)”

Provision 2 Source 1, section CM.2, page 35: “Indicators.

- 1) Use appropriate methodologies to assess the impacts¹⁰⁰, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being of the community groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the communities (including water and soil resources), over the project lifetime.
- 2) Describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.

¹⁰⁰ Impacts' includes benefits, costs and risks, including those that are direct and indirect and including those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs. Note that the term 'benefits' refers to positive impacts and the phrase 'costs and risks' equates with negative impacts."

Provision 3 Source 1, section CM.4, page 38: "Indicators"

Develop and implement a monitoring plan that identifies community variables¹⁰⁶ to be monitored, communities, community groups and other stakeholders to be monitored, the types of measurements, the sampling methods and the frequency of monitoring and reporting.¹⁰⁷ Monitoring variables must be directly linked to the project's objectives for communities and community groups and to predicted outputs, outcomes and impacts identified in the project's causal model related to the well-being of communities (described in G1.8). Monitoring must assess differentiated impacts, including and benefits, costs and risks, for each of the community groups and must include an evaluation by the affected community groups.¹⁰⁸ Develop and implement a monitoring plan to assess the effectiveness of measures taken to maintain or enhance all identified high conservation values related to community well-being. Disseminate the monitoring plan, and any results of monitoring undertaken in accordance with the monitoring plan, ensuring that they are made publicly available on the internet and summaries are communicated to the communities and other stakeholders through appropriate means.

¹⁰⁶ Potential variables may include but are not limited to: income, employment generation, health, market access, schools, food security and education.

Assessment outcome

Yes (1 Point).

Justification of assessment

While the standard provisions do not explicitly refer to “health”, the assessment and mitigation of social impacts includes different aspects of well-being including “social, cultural, environmental and economic aspects” (Provision 2). Well-being is furthermore defined as life quality including “environmental, social, economic, psychological, spiritual and medical dimensions” (Provision 1). It is therefore concluded that this entails the assessment and mitigation (safeguards) of adverse health and safety impacts. The indicator is thus fulfilled. The program further suggests that health is one of the community variables monitored by the project owners (Provisions 3). The standard’s project description template further includes health as a separate category in its standardized benefit metrics (Source 4).

Indicator 6.1.34

Relevant scoring methodology provisions

“The program provisions specifically require that projects avoid physical and economic displacement in its projects and that, in exceptional circumstances where avoidance is not possible, displacement occurs only with appropriate forms of legal protection and compensation as well as informed participation of those affected.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 21: “The project recognizes respects and supports rights to lands, territories and resources, including the statutory and customary rights of Indigenous Peoples and others within communities and other stakeholders.⁵⁹ The free, prior and informed consent (as described in G5.2) of relevant property rights holders has been obtained at every stage of the project.

Project activities do not lead to involuntary removal or relocation of property rights holders from their lands or territories and do not force them to relocate activities important to their culture or livelihood.⁶⁰ Any proposed removal or relocation occurs only after obtaining free, prior and informed consent from the relevant property rights holders.

⁵⁹ United Nations Human Rights Council, UN Guiding Principles on Business and Human Rights (2011) (available at: <https://business-humanrights.org/en/un-guiding-principles>).

⁶⁰ United Nations Human Rights Council, UN Declaration on the Rights of Indigenous Peoples, Article 10. ILO Convention 169, Article 16, 2008.”

Provision 2 Source 1, section G5, page 21: “Respect for Rights to Lands, Territories and Resources and Free, Prior and Informed Consent

- 1) Describe and map statutory and customary⁶¹ tenure/use/access/management rights to lands, territories and resources in the project zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and taken by the project to help to secure statutory rights. Demonstrate that all property rights are recognized, respected and supported.
- 2) Demonstrate with documented consultations and agreements that:
 - a) The project will not encroach uninvited on private property, community property,⁶² or government property,
 - b) The free, prior and informed consent⁶³ has been obtained of those whose property rights are affected by the project through a transparent, agreed process. [..]
 - c) Appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project.⁶⁵
- 3) Demonstrate that project activities do not lead to involuntary removal or relocation of property rights holders from their lands or territories and does not force them to relocate activities important to their culture or livelihood. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior and informed consent of those concerned and includes provisions for just and fair compensation.⁶⁶

⁶¹ 'Customary rights' to lands, territories and resources refer to patterns of long-standing community lands, territories and resource usage in accordance with Indigenous Peoples' and local communities' customary laws, values, customs and traditions, including seasonal or cyclical use, rather than formal legal title to lands, territories and resources issued by the State. (See: World Bank Operational Manual, OP 4.10 – Indigenous Peoples, 200, available at: <https://policies.worldbank.org/sites/ppf3/PPFDocuments/090224b0822f89d5.pdf>)

⁶² Including collective rights, both customary and statutory, to lands, territories and resources that communities have traditionally owned, occupied or otherwise used or acquired whether or not such ownership has been formally recorded. (Food and Agriculture Organization of the UN, Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security, Principle 3.1, 2012 (available at: <http://www.fao.org/docrep/016/i2801e/i2801e.pdf>)).

⁶³ In conformance with the United Nations Declaration on the Rights of Indigenous Peoples and International Labour Organization (ILO) Convention 169. The following manual can be used for guidance on Free, Prior and Informed Consent: Anderson, 2011, Free, Prior and Informed Consent in REDD+: Principles and Approaches for Policy and Project Development (available at <http://www.recoftc.org>). If non-contacted peoples are located or believed to be located in the project area, their right to remain in isolation should be respected in accordance with local, national and international laws and recommendations. Unless invited to make contact, implementing entities should not engage in any activities that may impact these populations, including project activities. There should be a buffer zone between the project area and the area in which indigenous populations living in voluntary isolation reside, or are believed to reside. Guidelines for the Protection of Indigenous Peoples in Voluntary Isolation and Initial Contact in the Amazon Region, the Gran Chaco and the Eastern Region of Paraguay, Office of the

United Nations High Commissioner (OHCHR) and the Spanish Agency for International Cooperation and Development, May 2012.

⁶⁴ Definition of free prior and informed consent from United Nations Department of Economic and Social Affairs, 2005, International Workshop on Free, Prior and Informed Consent and Indigenous Peoples, UN Document PFII/2005/WS.2/4 (available at: http://www.un.org/esa/socdev/unpfii/documents/workshop_FPIC_tamang.doc). It is important to note that consultation is not the same as consent. Free, prior and informed consent is the decision made by a community following a consultation. A project team must receive affirmative consent from relevant property rights holders prior to commencing with project activities. UN General Assembly, 2007, UN Declaration on the Rights of Indigenous Peoples, Resolution adopted by the General Assembly, A/RES/61/295, Articles 32 (2), (available at: [www.un.org/esa/socdev.unpfii/documents/DRIPS_en.pdf](http://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf)).

⁶⁵ Compensation should include both the financial and non-financial costs of the loss of lands, for example loss of culture or loss of business opportunity. See UN Declaration on the Rights of Indigenous Peoples, Article 10. Article 28

⁶⁶ In conformance with the United Nations Declaration on the Rights of Indigenous Peoples and ILO 169, Article 28 of the UN Declaration on the Rights of Indigenous Peoples indicates that unless otherwise agreed upon, compensation should be in the form of lands, territories or resources equivalent in quality, size and legal status to those taken. When such compensation is not available, monetary compensation is appropriate.

Assessment outcome

No (0 Points).

Justification of assessment

The standard requires that no involuntary relocations shall occur (Provisions 1 and 2). If relocations or removals occur, free, prior and informed consent by affected people shall be ensured as well as appropriate compensation (Provisions 1 and 2). The standard does not have an explicit requirement that displacement shall be avoided, and only allowed in exceptional circumstances. The indicator is therefore not fulfilled.

Indicator 6.1.35

Relevant scoring methodology provisions

“The program has safeguards in place in relation to labour rights that at least require projects to ensure decent and safe working conditions, fair treatment, sound worker-management relationships and equal opportunity for workers.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G, page 19: “Worker Relations

- 10) Demonstrate that people from the communities are given an equal opportunity to fill all work positions (including management) if the job requirements are met. Explain how workers are selected for positions and where relevant, describe the measures needed and taken to ensure community members, including women and vulnerable and/or marginalized people, are given a fair chance to fill positions for which they can be trained.
- 11) Submit a list of all relevant laws and regulations covering worker’s rights in the host country. Describe measures needed and taken to inform workers about their rights. Provide assurance that the project meets or exceeds all applicable laws and/or regulations covering worker rights and, where relevant, demonstrate how compliance is achieved.
- 12) Comprehensively assess situations and occupations that might arise through the implementation of the project and pose a substantial risk to worker safety. Describe measures needed and taken to inform workers of risks and to explain how to minimize such risks. Where worker safety cannot be guaranteed, project proponents must show how the risks are minimized using best work practices in line with the culture and customary practices of the communities.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The provisions include the requirement to adhere to the host country’s worker’s rights, to inform workers about their rights and potential risks, to assess and mitigate risks in relation to work, and to document and ensure equal opportunities for jobs created by the project (Provision 1). The indicator is therefore fulfilled.

Indicator 6.1.36

Relevant scoring methodology provisions

“The program has safeguards in place in relation to environmental issues that at least address air pollution, water pollution, soil and land protection, waste management, and biodiversity.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section B1, page 41: “Indicators.

1) Describe biodiversity¹¹² within the project zone at the start of the project and threats to that biodiversity, using appropriate methodologies.

2) Evaluate whether the project zone includes any of the following high conservation values (HCVs) related to biodiversity and describe the qualifying attributes for any identified HCVs:¹¹³

a) Globally, regionally or nationally significant concentrations of biodiversity values:

i) Protected areas¹¹⁴

ii) Threatened species¹¹⁵

iii) Endemic species¹¹⁶

iv) Areas that support significant concentrations of a species during any time in their lifecycle.¹¹⁷

b) Globally, regionally or nationally significant large landscape-level areas where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance;

c) Threatened or rare ecosystems.¹¹⁸

3) Identify the areas that need to be managed to maintain or enhance the identified HCVs.

4) Describe how the without-project land use scenario would affect biodiversity conditions in the project zone.¹¹⁹

¹¹² Biodiversity’ is defined as the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems (Convention on Biological Diversity, 1992) “

Provision 2 Source 1, section B2, page 43-44: “Indicators.

1) Use appropriate methodologies to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the project zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.

2) Demonstrate that the project’s net impacts on biodiversity in the project zone are positive, compared with the biodiversity conditions under the without-project land use scenario (described in B1).

3) Describe measures needed and taken to mitigate negative impacts on biodiversity and any measures needed and taken for maintenance or enhancement of the high

conservation value attributes (identified in B1.2) consistent with the precautionary principle.

- 4) Demonstrate that no high conservation values (identified in B1.2) are negatively affected by the project.

[..]

- 7) Guarantee that no GMOs are used to generate GHG emissions reductions or removals.
- 8) Describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents and other inputs used for the project.
- 9) Describe the process for identifying, classifying and managing all waste products resulting from project activities.”

Provision 3 Source 1, section CM.2 “Net positive community impacts”, page 35: “Concept.

The project generates net positive impacts on the well-being of communities and the community groups within them over the project lifetime. The project maintains or enhances the high conservation values in the project zone that are of importance to the well-being of communities.

Indicators.

- 1) Use appropriate methodologies to assess the impacts¹⁰⁰, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario. The assessment of impacts must include changes in well-being due to project activities and an evaluation of the impacts by the affected community groups. This assessment must be based on clearly defined and defensible assumptions about changes in well-being of the community groups under the with-project scenario, including potential impacts of changes in all ecosystem services identified as important for the communities (including water and soil resources), over the project lifetime.
- 2) Describe measures needed and taken to mitigate any negative well-being impacts on community groups and for maintenance or enhancement of the high conservation value attributes (identified in CM1.2) consistent with the precautionary principle.

¹⁰⁰ Impacts’ includes benefits, costs and risks, including those that are direct and indirect and including those related to social, cultural, environmental and economic aspects and to human rights and rights to lands territories and resources. Costs include those related to responsibilities and also opportunity costs. Note that the term ‘benefits’ refers to positive impacts and the phrase ‘costs and risks’ equates with negative impacts.

Assessment outcome

No (0 Points).

Justification of assessment

The standard approaches the subject by requiring an assessment of potential impacts of projects on ecosystem services and biodiversity (Provision 3). In principle, this conceptual approach does address aspects of the “environment” that both relate to humans (ecosystem services) and the flora and fauna (biodiversity and high conservation values) (Provision 1 and 2). The requirement to describe steps needed and taken to mitigate any negative impacts thus provides for an overall framework for projects to principally ensure that the environment is protected, and community well-being is not negatively affected. For some environmental assets the standard further includes specific safeguards. For example, it requires project owners to describe the process for identifying, classifying and managing all waste products resulting from project activities (Provision 2). Similar applies to the requirement to describe the possible adverse effects of, and justify the use of, fertilizers, chemical pesticides, biological control agents. There are however no specific safeguards formulated by the standard that are addressing air and water pollution as well as soil and land protection. The indicator is therefore not fully fulfilled.

Indicator 6.1.37

Relevant scoring methodology provisions

“The program requires, at least for specific project types as defined by the program, the establishment of a specific benefits-sharing mechanism with local stakeholders (e.g., that part of carbon credit proceeds are made available for community activities).”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section GL2, page 40: “Optional Criterion. Exceptional community benefits.

The project is a smallholder/community-led and implemented on land that they own or manage and/or is explicitly pro-poor in terms of targeting benefits to globally poorer communities.

The project delivers equitable well-being benefits to smallholders/community members,¹⁰⁹ including short-term and long-term benefits and enhancement of security and empowerment of smallholders/community members.

[..]

Well-being benefits are shared equitably not only with the smallholders/community members but also among the smallholders/community members, ensuring that equitable benefits also flow to more marginalized and/or vulnerable households and individuals within them. [..]

- 6) Describe the design and implementation of a benefit sharing mechanism, demonstrating that smallholders/community members have fully and effectively participated in defining the decision-making process and the distribution mechanism for benefit sharing; and demonstrating transparency, including on project funding and costs as well as on benefit distribution.”

Assessment outcome

Yes (1 Point).

Justification of assessment

As an optional criterium, projects under this standard can be implemented as smallholder/community-led projects. If project owners want to claim these “exceptional community benefits” (Provision 1), they have to implement a benefit sharing mechanism to share well-being benefits. The indicator is therefore fulfilled.

Indicator 6.1.38

Relevant scoring methodology provisions

“The program explicitly prohibits the introduction of invasive non-native species, where relevant (e.g. land use projects).”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section B2, page 43: “The project generates net positive impacts on biodiversity within the project zone over the project lifetime. The project maintains or enhances any high conservation values present in the project zone that are of importance in conserving biodiversity. Native species¹²⁰ are used unless otherwise justified and invasive species¹²¹ and genetically modified organisms (GMOs)¹²² are not used.

¹²⁰ ‘Native species’ are defined as those that are part of the composition of a natural representative ecosystem of the area where the project site is located.

¹²¹ ‘Invasive species’ are defined as non-native species that threaten ecosystems, habitats or species in the Project Zone as identified in the Global Invasive Species Database (see: <http://www.iucngisd.org/gisd/>), from scientific literature and from local knowledge.”

Provision 2 Source 1, section B2, page, 43-44: “

- 5) Identify all species used by the project and show that no known invasive species are introduced into any area affected by the project and that the population of any invasive species does not increase as a result of the project.
- 6) Describe possible adverse effects of non-native species¹²⁴ used by the project on the region's environment, including impacts on native species and disease introduction or facilitation. Justify any use of non-native species over native species.

¹²⁴ 'Non native species' are defined as species occurring outside their natural range, whether accidentally or intentionally introduced."

Assessment outcome

Yes (1 Point).

Justification of assessment

Generally, the standard promotes the "use" of native species (Provision 1) and bans the use and introduction of invasive non-native species. Furthermore, the provisions make the difference between native, non-native, and invasive non-native clear through the use of footnotes. Non-native species are not automatically considered invasive – even though this is often the case. If non-native species are used in the project, adverse impacts need to be identified and the use of these species justified. The indicator is therefore fulfilled.

Indicator 6.1.39

Relevant scoring methodology provisions

"The program requires experts to support processes dedicated to avoiding physical and economic displacement and to free, prior and informed consent from indigenous people.

OR

The program requires experts to support all safeguard processes which are included in the program's provisions."

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G4., page 20: "Management capacity. Concept.

The project has adequate human and financial resources for effective implementation. Indicators.

5) Document key technical skills required to implement the project successfully, including community engagement, biodiversity assessment and carbon measurement and monitoring skills. Document the management team’s expertise and prior experience implementing land management and carbon projects at the scale of this project. If relevant experience is lacking, the proponents must either demonstrate how other organizations are partnered with to support the project or have a recruitment strategy to fill the gaps.”

Assessment outcome

No (0 Points).

Justification of assessment

While the standard requires that the project team has the necessary skills and expertise to implement the project, the provisions do not include a specific requirement that necessitates experts to support processes dedicated to avoiding physical and economic displacement and to free, prior and informed consent from indigenous people. There is also no general requirement that all safeguard processes need to be supported by experts. The indicator is therefore not fulfilled.

Indicator 6.1.40

Relevant scoring methodology provisions

“The program provides specific guidance for how each of its safeguards should be applied (for example, similar to the guidance notes of the IFC).”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G5, page 22: “Demonstrate with documented consultations and agreements that:

- a) The project will not encroach uninvited on private property, community property,⁶² or government property,
- b) The free, prior and informed consent⁶³ has been obtained of those whose property rights are affected by the project through a transparent, agreed process.

Free, Prior and Informed Consent⁶⁴ is defined as:

⁶³ In conformance with the United Nations Declaration on the Rights of Indigenous Peoples and International Labour Organization (ILO) Convention 169. The following manual can be used for guidance on Free, Prior and Informed Consent: Anderson, 2011, Free, Prior and Informed Consent in REDD+: Principles and Approaches for Policy and Project Development (available at <http://www.recoftc.org>). If

non-contacted peoples are located or believed to be located in the project area, their right to remain in isolation should be respected in accordance with local, national and international laws and recommendations. Unless invited to make contact, implementing entities should not engage in any activities that may impact these populations, including project activities. There should be a buffer zone between the project area and the area in which indigenous populations living in voluntary isolation reside, or are believed to reside. Guidelines for the Protection of Indigenous Peoples in Voluntary Isolation and Initial Contact in the Amazon Region, the Gran Chaco and the Eastern Region of Paraguay, Office of the United Nations High Commissioner (OHCHR) and the Spanish Agency for International Cooperation and Development, May 2012.

⁶⁴ Definition of free prior and informed consent from United Nations Department of Economic and Social Affairs, 2005, International Workshop on Free, Prior and Informed Consent and Indigenous Peoples, UN Document PFII/2005/WS.2/4 (available at: http://www.un.org/esa/socdev/unpfii/documents/workshop_FPIC_tamang.doc). It is important to note that consultation is not the same as consent. Free, prior and informed consent is the decision made by a community following a consultation. A project team must receive affirmative consent from relevant property rights holders prior to commencing with project activities. UN General Assembly, 2007, UN Declaration on the Rights of Indigenous Peoples, Resolution adopted by the General Assembly, A/RES/61/295, Articles 32 (2), (available at: www.un.org/esa/socdev.unpfii/documents/DRIPS_en.pdf).

Provision 2 Source 1, CM2, page 35: “Use appropriate methodologies⁹⁹ to assess the impacts¹⁰⁰, including predicted and actual, direct and indirect benefits, costs and risks, on each of the identified community groups (identified in G1.5) resulting from project activities under the with-project scenario.

⁹⁹ The following manual is recommended for guidance on appropriate methodologies: Richards, M. and Panfil, S.N. 2011, Social and Biodiversity Impact Assessment (SBIA) Manual for REDD+ Projects: Part 1 – Core Guidance for Project Proponents. Climate, Community & Biodiversity Alliance, Forest Trends, Fauna & Flora International and Rainforest Alliance. Washington, DC (available at: <http://www.v-c-s.org/project/ccb-program/guidance/>).

Provision 3 Source 1, section B2, page 43: “Use appropriate methodologies¹²³ to estimate changes in biodiversity, including assessment of predicted and actual, positive and negative, direct and indirect impacts, resulting from project activities under the with-project scenario in the project zone and over the project lifetime. This estimate must be based on clearly defined and defensible assumptions.

¹²³ The following manual is recommended for guidance on appropriate methodologies: Richards, M. and Panfil, S.N. 2011, Social and Biodiversity Impact Assessment (SBIA) Manual for REDD+ Projects: Part 1 – Core Guidance for Project Proponents. Climate, Community & Biodiversity Alliance, Forest Trends, Fauna & Flora International and Rainforest Alliance. Washington, DC (available at: <http://www.v-c-s.org/project/ccb-program/guidance/>).

Assessment outcome

Yes (1 Point).

Justification of assessment

The standard provides further explanations and references to methodologies, UN treaties or alike in footnotes in the relevant impact and safeguard section. Provision 1 to 3 are examples. The indicator is therefore fulfilled.

Indicator 6.1.41

Relevant scoring methodology provisions

“The program has a dedicated gender policy, strategy or action plan that integrates gender considerations and women empowerment into all aspects of its operations.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 3 Verra - Who We Are – Important Policies. Online available at: <https://verra.org/about/overview/#important-policies->

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points)

Justification of assessment

Verra – the entity administering the standard has no dedicated gender policy, strategy or action plan in place that integrates gender considerations and women empowerment into all aspects of its operations.

Indicator 6.1.42

Relevant scoring methodology provisions

“The program explicitly requires that stakeholder consultations are conducted in a gender sensitive manner, enabling equal participation.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 17: “Consultation.

Describe how communities including all the community groups and other stakeholders have influenced project design and implementation through effective consultation,⁴⁴ particularly with a view to optimizing community and other stakeholder benefits, respecting local customs, values and institutions and maintaining high conservation values.

⁴⁴ Effective consultation requires project proponents to inform and engage broadly with the communities and other stakeholders using socially and culturally appropriate methods to enable meaningful influence on the subject of consultation. Consultations must be gender and inter-generationally sensitive with special attention to vulnerable and/or marginalized people and must be conducted at mutually agreed locations and through representatives who are designated by the groups themselves in accordance with their own procedures. Different approaches may be appropriate for different community groups or other stakeholders. communities and community groups potentially affected by the project must have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design including the theory of change, both before the project design is finalized and during implementation. Consultations must include participatory identification of ecosystem services important for communities and high conservation values, for example through participatory mapping. Consultations must also include an evaluation of the type and magnitude of impacts resulting from project activities (CM2.1). Consultations must also include a participatory design of feedback and grievance redress procedures (G3.8).”

Assessment outcome

Yes (1 Point).

Justification of assessment

The provisions for effective consultation – provided only in the footnotes – include the requirement to conduct consultation in a gender and inter-generationally sensitive manner. The indicator is therefore fulfilled.

Indicator 6.1.43

Relevant scoring methodology provisions

“The program explicitly requires that project developers perform a gender safeguard assessment during project design.”

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section G3, page 18: “Anti-Discrimination.

Describe the measures needed and taken to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination⁴⁷ or sexual harassment with respect to the project.

⁴⁷ Including discrimination based on gender, race, religion, sexual orientation or other habits.”

Assessment outcome

No (0 Points).

Justification of assessment

Provision 1 not only prescribes that any form of discrimination, including discrimination based on gender, shall be banned but that project owners describe the measures needed and taken to ensure this. However, this provision does not explicitly require a systematic assessment of where discrimination based on gender might occur. The indicator is therefore not fulfilled.

Scoring results

According to the above assessment, the carbon crediting program achieves a total point score of 32 for the indicators. Applying the scoring approach in the methodology, this results in a score of 3.61 for the criterion.