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: | 5.2 Transparency |
| Carbon crediting program: | Gold Standard |
| Assessment based on carbon crediting program documents valid as of: | 30 June 2021 |
| Date of final assessment: | 20 May 2022 |
| Score: | 3.64 |
Assessment

Indicator 5.2.1

Relevant scoring methodology provisions

“The program makes publicly available on its website the names and affiliations of all non-staff individuals or organizations serving in a professional capacity to support the administration of the program (e.g., members of the Board, advisory groups or expert committees).”

Information sources considered


Relevant carbon crediting program provisions

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Assessment outcome

Yes (1 Point).

Justification of assessment

On the website all members of the Gold Standard Board of Directors, the Technical Governance Committee, and all Senior Advisors are listed by name.

Indicator 5.2.2

Relevant scoring methodology provisions

“Minutes of Board of Directors or Trustees meetings are publicly available on the program’s website.”

Information sources considered

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Relevant carbon crediting program provisions

No provisions were identified.

Assessment outcome

No (0 Points).
Justification of assessment

No relevant provision was found.

Indicator 5.2.3

Relevant scoring methodology provisions

“The conflict of interest provisions identified in indicator 5.1.5 for non-staff individuals serving in a professional capacity to support the administration of the program (e.g., members of the Board, advisory groups or expert committees) and the code of conduct for staff and registry administrators identified in indicators 5.1.6 are publicly available on the program’s website.”

Information sources considered


Relevant carbon crediting program provisions

Provision 1 Source 1, Section 2.5, p.2: “With their appointment the members accept these present Terms of Reference of the TGC. All members and as applicable all observers, experts and staff shall: […] Declare all conflicts of interest at nomination and on an ongoing basis”

Provision 2 Source 1, Section 2.6, p.2: “In order to ensure confidentiality (see 3.2) and to avoid potential recurring conflicts of interest, none of the voting TGC members shall be directly employed by or working on an operational level for GS Secretariat (note working in consortium or joint funded work arrangements is permitted). TGC members shall inform Secretariat where they are engaged to undertake work for any other standards and/or certification bodies. Members are expected to do the same in relation to informing other employers of their work with the GS”

Provision 3 Source 1, Section 4.2.2.4, p.5: “When a decision before the TGC constitutes a conflict of interest for any of its members, the affected member(s) will be excluded from voting on this decision and the quorum adjusted accordingly. Conflicts of interest must be announced by the relevant member(s) to the Chair before the item is considered, preferably when the agenda is agreed upon during the opening of the meeting. Responsibility for declaration of conflicts of interest lies with the members.”

Provision 2 Source 2, Section 1, p.3: “PRINCIPLE: All Gold Standard developments, including standards setting, development of tools and guidance, assurance and oversight and
governance shall be governed and decided upon independently and impartially. IN PRACTICE: This means that:

A robust Conflict of Interest policy shall be implemented at all times."

Provision 3 Source 3, Section 6.6, p.8: “When a decision before the TAC constitutes a conflict of interest for any of its members, the affected member(s) will be excluded from voting on this decision and the quorum adjusted accordingly. Conflicts of interest must be announced by the relevant member(s) to the Chair before the item is considered, preferably when the agenda is agreed upon during the opening of the meeting. Responsibility for the declaration of conflicts of interest lies with the members. The TAC Chair or Vice-Chair or any other TAC member, as well as the Secretariat, can ask TAC members to abstain from the decision-making process or to be excluded from the discussions if there is a perceived conflict of interest.”

**Assessment outcome**

No (0 Points).

**Justification of assessment**

No conflict of interest provisions could be identified for board members, program staff, or registry administrators. Conflict of interest provisions for the Technical Governance Committee and the Technical Advisory Committee are included in the Terms of Reference and available on the program website.

**Indicator 5.2.4**

**Relevant scoring methodology provisions**

“The program defines and publicly discloses the level at which activities are allowed under the program (e.g., project-based, program of activities, etc.) and scope of eligible activities (e.g., which sectors, project types, or geographic locations are or are not included within the scope of the program).”

**Information sources considered**


**Relevant carbon crediting program provisions**

Provision 1 Source 1, Section 3.1.1, p. 6: “The following General Eligibility Criteria applies to all projects seeking Gold Standard Certification:
(a) Types of Project: Eligible projects shall include physical action/implementations on the ground. Pre-identified eligible project types are identified in the Eligibility Principles and Requirements section.

(b) Location of Project: Projects may be located in any part of the world.

(c) Project Area, Project Boundary and Scale: The Project Area and Project Boundary shall be defined. Projects may be developed at any scale although certain rules, requirements and limitations may apply under specific Activity Requirements, Impact Quantification Methodologies and Products Requirements. In order to avoid double counting the Project shall not be included in any other voluntary or compliance standards programme unless approved by Gold Standard (for example through dual certification). Also, if the Project Area overlaps with that of another Gold Standard or other voluntary or compliance standard programme of a similar nature, the project shall demonstrate that there is no double counting of impacts at design and performance certification (for example use of similar technology or practices through which the potential arises for double counting or misestimation of impacts amongst projects).

(d) Host Country Requirements: Projects shall be in compliance with applicable Host Country’s legal, environmental, ecological and social regulations. […]"

Provision 2 Source 1, Section 4.1.1, p.7: “In order to achieve Certification with Gold Standard, all Projects shall contribute to the Vision and Mission of Gold Standard, applied specifically through the following Eligibility Principles and Requirements. […]”

Provision 3 Source 1, Section 4.1.55, p.18: “The Gold Standard certification cycle is suitable for multi-phased programmes with multiple interventions with an extended implementation period within a sector or multiple sectors, as is typically the case in, for example, urban low-carbon growth programmes.”

Provision 4 Source 1, Section 4.1.56, p.18: “Programmes of Activity shall follow Programme of Activity Requirements. The Requirements in this document are applicable for a Programme where multiple individual activities are spread over space and time.”

Provision 5 Source 2, Section 2.1.1, p.4: “Unless otherwise stated elsewhere in the Principles & Requirements, Projects involving a mix of eligible and ineligible components can only claim credits for the Emission Reductions and/or sequestration associated with the eligible component of the project.”

Provision 6 Source 2, Section 2.1.2, p.4: “Bundled Projects1 [Several project activities which form a single project activity or portfolio without the loss of distinctive characteristics of each component]: Where Projects are submitted together for certification within a bundle, each Project within the bundle shall individually conform to all GS4GGRequirements. Eligibility criteria with regards to the scale of the Project shall apply to the bundle as a whole and not to the individual Projects.”

Provision 7 Source 2, Section 2.1.3, p.4: “Programme of Activities (PoA): (LUF – N/A) Where a group of Projects are submitted together for Gold Standard Design Certification within a Programme of Activities, each of these Projects shall conform to all Requirements including the Programme of Activity Requirements. A microscale VPA can only be part
of a Microscale PoA and shall conform to all requirements including those listed in Annex A of the Programme of Activity Requirements.”

Provision 8 Source 2, Section 5.1.1, p.5: “VER Projects may be located in any host country or state. However, where host countries or states have mandatory operational schemes to reduce GHG emissions in any form (e.g. cap & trade, carbon tax etc.), Projects shall only be eligible if the Project Developer has either:

a. provided Gold Standard with satisfactory justification that no double counting of emission reductions occur or

b. has committed to retiring eligible units equal to the quantity of Gold Standard VERs. Refer to Annex A of this document.” (Section 3.1.1 of the GHG Emissions Reduction & Sequestration Product Requirements)

The Following Project types are eligible for issuance of GSVERs or GSCERs:

a. Renewable Energy Supply: Project activities that generate and deliver energy services (e.g. mechanical work/electricity/heat) from non-fossil and renewable energy sources. Note that specific requirements apply with regards to the issuance of Gold Standard Labelled Renewable Energy GSCERs and GSVERs, as listed in section 2 of the Renewable Energy Activity Requirements.

b. End-Use Energy Efficiency Improvement: Project activities that reduce energy requirements as compared to baseline scenario without affecting the level and quality of services or products, where the end user of the products and services are clearly identified and when the physical intervention is required at the user end. For example, efficient cooking, heating, lighting, etc.

c. Waste Handling & Disposal: The waste handling and disposal category refers to all waste handling Projects that deliver an energy service (e.g. LFG with some of the recovered methane used for electricity generation) or a usable product with sustainable development benefits (e.g. composting).

d. Land Use and Forests: including Afforestation/Reforestation and Agriculture Projects (CDM A/R projects are not eligible for issuance of GSCERs, however project may issue GSVERs after transitioning to GS4GG)

Provision 9 Source 2, Section 6.1.1-6.1.3, p.6: “Projects are ineligible for carbon crediting under GS4GG if the OFFICIAL DEVELOPMENT ASSISTANCE (ODA) is provided to the project under the condition that the credits generated by the Project will be transferred, either directly or indirectly, to the donor country providing ODA support. The OECD defines ODA as financial flows:

a. To developing countries and multilateral institutions;

b. Provided by government agencies (e.g. USAID);

c. Whose main objective is the economic development and welfare of developing countries; and d. That are concessional in character, conveying a grant element of at least 25%.
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Project Developer submitting a Project located in a country named by the OECD Development Assistance Committee’s ODA recipient list shall sign and submit the ODA Declaration.

Where there is a material change in the role of ODA for the development or implementation of a Project, the Project Developer shall immediately submit an amended ODA Declaration.

Assessment outcome

Yes (1 Point).

Justification of assessment

General Eligibility Criteria for projects seeking Gold Standard Certification are defined in Provisions 1, 5, 6, and 7. Eligibility Principles and Requirements for projects are specified in Provisions 2, 3, and 4. Provision, 7, 8, and 9 further determine the location and types of projects eligible under the program.

Indicator 5.2.5

Relevant scoring methodology provisions

“The normative program documents are publicly available on the program's website”

Notes: In the definitions section the Methodology for assessing the quality of carbon credits defines normative program documents as follows: “The documents adopted under a carbon crediting program that specify requirements, procedures, and administrative and operational aspects of the program. This typically includes standards, (such as quantification methodologies), procedures, manuals, guidance documents, and forms.”

Information sources considered


Relevant carbon crediting program provisions

Provision 1 Source 2, website: “Section Guide

Principles and Requirements (100): The requirements and guidelines that all projects must follow.*

Activity Requirements (200): The requirements that apply to specific project types. These include Land-Use and Forests (LUF), Renewable Energy (RE), and Community Services (CSA).**

Contextual Requirements (300): Requirements for projects operating within a specific context. These include Sustainable Urban Development.
SDG Impact Quantification (400): Methodologies and/or tools that must be applied to quantify the SDG impacts from a specific project type. Note multiple methodologies may be applied in one project.

Product Requirements (500): The requirements that need to be applied if you would like to issue a Gold Standard certified product, such as VERs, GS-CERs or Gold Standard labelled RECs.

Governance: Documents related to the governance procedures of the standard. These are not required to be read to develop a project.

*The Principles and Requirements (100) also contain specific requirements that apply only to certain types of project design (e.g. microscale and PoA requirements).

**Activity Requirements (200) may include exceptions to the Principles and Requirements applicable to specific project activity types."

Document types

Core Document. Documents that are mandatorily applicable to all projects. These core documents provide the requirements, principles and procedures every Gold Standard project must follow.

Guideline Provide mandatory guidance on a specific area or subject

Activity Requirement. Mandatory documents that provide the requirements specific to a Gold Standard project type.

Optional Requirement. Specific requirements that apply only to certain types of project design (e.g. Microscale and PoA requirements)

Assurance Document. Documents that provide mandatory guidance and requirements on assurance.

Governance Document. Documents related to the governance procedures of the standard.

Methodologies. The documents that need to be followed to quantify and certify the SDG impacts from project activities.

Framework Methodology. Overarching requirements for quantifying SDG impacts. These frameworks provide the definitions, requirements and core calculation procedures that need to be followed by corresponding activity modules.

Activity Module. Activity specific modules. These documents provide the requirements and calculation approaches applicable to specific activities. They are developed following the guidance from the relevant framework methodology.

Template. All forms and templates that may be required during the project certification cycle.

Procedure Methodology Tool. Tools to help calculate the SDG impacts from certain methodologies.
Rule Update. Updates to the standard documentation. These are to be applied in addition to the standard documentation.

Rule Clarification. Clarifications to the standard documentation.”

**Assessment outcome**

Yes (2 Points).

**Justification of assessment**

The Gold Standard core normative and regulatory documents as defined in the Guide Tutorial (Provision 1) are publicly disclosed on the program website (Source 1).

**Indicator 5.2.6**

**Relevant scoring methodology provisions**

“Input received through public consultations relating to material program updates (e.g., new or updated normative program documents) is documented and the program reports back to the public on how raised issues were addressed.”

**Information sources considered**


**Relevant carbon crediting program provisions**

Provision 1 Source 1, Section 4, p.3: “Immediately following each public stakeholder consultation, The Gold Standard will publish the following documents on its website:

- The initial call for comments with any supporting documentation;
- All responses received by The Gold Standard in connection with the stakeholder consultation;
- Any responses by The Gold Standard to a stakeholder in connection with that stakeholder’s comments; and
- The ultimate decision or rule made by The Gold Standard.”

**Assessment outcome**

Yes (1 Point).

**Justification of assessment**

The above documentation clearly specifies that the indicator is fulfilled.
Indicator 5.2.7

Relevant scoring methodology provisions

“The program clearly distinguishes mandatory requirements from recommendations and guidance (e.g., by uniformly applying “shall” for mandatory requirements and “should” for recommendations or guidance throughout its normative program documents).”

Information sources considered


Relevant carbon crediting program provisions

Provision 1 Source 1, website: “Core Document: Documents that are mandatorily applicable to all projects. These core documents provide the requirements, principles and procedures every Gold Standard project must follow.

Guideline Provide mandatory guidance on a specific area or subject

Activity Requirement: Mandatory documents that provide the requirements specific to a Gold Standard project type.

Optional Requirement: Specific requirements that apply only to certain types of project design (e.g. Microscale and PoA requirements)

Assurance Document: Documents that provide mandatory guidance and requirements on assurance.

Governance Document: Documents related to the governance procedures of the standard.

Methodologies: The documents that need to be followed to quantify and certify the SDG impacts from project activities. [...]”

Provision 2 Source 2, Section 1.2.1-2, p: 3: “The Principles & Requirements set out in this document are applicable to all Project Developers and the Projects or Programmes* for which Gold Standard Certification is sought. It also represents the Requirements against which Gold Standard Validation and Verification Bodies (hereafter VVBs) shall Validate or Verify the Project, in conjunction with the Validation & Verification Body Requirements and any applicable Conformity Criteria.

The Requirements shall be applied as per the relevant sections contained within this document and those associated or referenced.”

Provision 3 Source 2, Section 1.3.1-1.3.3, p: 4: “All Projects shall apply the Principles & Requirements and any associated documents.”
All Projects shall also apply the Activity Requirements related to the project type – unless stated otherwise. If no Activity Requirements exist for the proposed project type, then the Requirements shall be as per this document.

In addition to 1.3.1 and 1.3.2, Projects that seek issuance of Gold Standard Certified Impact Statements or Products shall also follow the applicable Gold Standard Approved Impact Quantification Methodology and related Product Requirements.”

Provision 4 Source 2, Section 4.1.1, p: 7: “In order to achieve Certification with Gold Standard, all Projects shall contribute to the Vision and Mission of Gold Standard, applied specifically through the following Eligibility Principles and Requirements.”

Provision 5 Source 2, Section 5.1.1, p: 19: “Gold Standard for the Global Goals Project Certification is based on a five year renewable certification cycle, with key features as follows:

(a) All Projects must LIST with the Gold Standard by undertaking a Preliminary Review and uploading Key Project Information, draft Project Design Document and completed Stakeholder Consultation Report.

(b) Projects may then seek Gold Standard Certified Design status by successfully completing Validation (within two years of the date of Listing) and a subsequent Design Review.

(c) New projects attaining Gold Standard Certified Design status then enter a five-year renewable certification cycle wherein for each five-year period they must undergo Verification and Performance Review to achieve and maintain Gold Standard Certified Project status and where sought Issuance of Gold Standard Certified Impact Statements and Products.

(d) To retain Certified Design status at the fifth year, all projects must undergo Design Certification Renewal by updating information and the baseline, unless otherwise stated in relevant Activity or Product requirements.

(e) The number of Performance Certifications in a five-year certification cycle is not limited although it must take place at least once, no later than two years after Project implementation or Design Certification, whichever is later. In case of Design Certification Renewal, it must take place no later than two years after Design Certification Renewal.

(f) The Activity Requirements and/or Product Requirements governs the maximum number of Design Certification Renewals allowed for specific project types. In the absence of any such stated Requirement, a Project is limited to one Renewal (i.e. maximum 10 years certification).

(g) Specific requirements apply in areas such as conflict and emergency zones as per Annex B of this document.”

Assessment outcome

No (0 Points).
Justification of assessment

Provision 1 provides for a classification of document types but uses contradictory language in its definitions of document types that make clear distinctions challenging. A “Guideline” document is described as “mandatory” (generally meaning required) but that contradicts the title of guideline (which generally means it should be used as a reference). Further, “Optional Requirement” as a classification of document is contradictory – if its optional that it should not be a requirement, if it’s a requirement then it should not be optional. Greater specificity and distinction between mandatory requirements and recommendations and guidance would improve the clarity of the program. The core documents use of “shall”, “may”, “should”, etc. clearly indicate which requirements are mandatory and which are not (Provisions 2, 3, 4, and 5). The indicator is not fulfilled due to the confusing document type names (Provision 1).

Indicator 5.2.8

Relevant scoring methodology provisions

“The program’s registry and project database are publicly accessible through the program’s website. The registry includes for each carbon credit information on its status (active or cancelled), its serial number, and its issuance date. The project database includes detailed information on each credited activity, including all documentation required for the approval of the activity (e.g., project design documents, auditing reports, and supporting documentation), and all documentation required for the issuance of carbon credits (e.g., monitoring reports including reproducible emission reductions and/or removal calculations, auditing reports, and supporting documentation).”

Information sources considered


Relevant carbon crediting program provisions

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Assessment outcome

Yes (1 Point).

Justification of assessment

The program’s registry (Source 1) includes the required information in a publicly accessible format to fulfil this indicator.
Indicator 5.2.9

Relevant scoring methodology provisions

“The program requires that all relevant non-confidential project documentation, including reports from validation and verification entities, be disclosed. The program defines what information would qualify as “confidential”.”

Information sources considered


Relevant carbon crediting program provisions

Provision 1  Source 1, Section 5.1.1.1, p.5: “c. The project shall transparently document and provide certification related information to enable reproducibility and traceability. Approved Project documents shall be made public on the Impact Registry unless pre-agreed as confidential (for example, in the case of commercially or privately sensitive information). The list of published documentation can be found in the Principles & Requirements (and in some cases also specific Activity Requirements and applicable Methodologies).”

Provision 2  Source 2, Section 6.1.1 and 6.1.2, p.30: “Projects shall provide evidence of conformity to the Requirements using approved Gold Standard Project templates except for supporting evidence and documents. The following project documentation and associated evidence and information are required at different stages of the project cycle.

(a) Preliminary Review

i. Key Project Information (see PDD Template)
ii. Draft PDD including Safeguarding Principles Assessment, SDG Impacts identified and draft Monitoring & Reporting Plan
iii. Stakeholder Consultation Report
iv. Supporting evidence and documents such as maps, survey results or calculations
v. Signed Cover Letter and Terms and Conditions

(b) Validation and Design Review

i. Completed PDD including Monitoring & Reporting Plan
ii. Fully completed Stakeholder Consultation Report
iii. Validation Report
iv. Any Activity, Context, Methodology or Product Requirement specific documentation
v. Supporting evidence and documents

(c) Annual Reporting
i. Completed Annual Report
ii. Supporting evidence and documents

(d) Verification and Performance Review
i. Any updates to the Key Project Information, PDD and Monitoring & Reporting Plan
ii. Any Context, Activity, Methodology and Product Requirement specific documentation
iii. Verification Report
iv. Supporting evidence and documents such as maps, survey results and/or calculations

“(a) Project Documentation, PDD, Monitoring & Reporting Plan, Reports, supporting documentation and the VVB’s Validation and Verification Reports shall be submitted to the Gold Standard Registry. Note that the VVB is responsible for uploading the final Validation or Verification Report.
(b) All Project Documentation, except confidential information, shall be made publicly available through the Impact Registry.”

Provision 3 Source 3, Section 1.1.2: “Gold Standard acknowledges that commercially or personal security sensitive and proprietary information including end users' details shall be considered confidential and may be present in some project documents (e.g., Project Design Documents (PDD), Monitoring Report, Emission Reductions spreadsheets, IRR spreadsheets, investment/finance-related supporting documents). Such information shall be deemed confidential and not be publicly disclosed following the process outlined in 1.2 below.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 1 and Provisions gathered under indicator 5.2.8 show that project documentation, including verification report need to be publicly disclosed, Provision 3 prescribe what information is considered “confidential”. The indicator is therefore fulfilled.

Indicator 5.2.10

Relevant scoring methodology provisions

“The program requires that information related to the determination of the baseline scenario, additionality, or the calculation of emission reductions or removals must be disclosed and cannot be considered confidential.”
Information sources considered


Relevant carbon crediting program provisions

Provision 1  Source 2, Section 6.1.1 and 6.1.2, p.30: -“(a) Project Documentation, PDD, Monitoring & Reporting Plan, Reports, supporting documentation and the VVB’s Validation and Verification Reports shall be submitted to the Gold Standard Registry. Note that the VVB is responsible for uploading the final Validation or Verification Report.
(b) All Project Documentation, except confidential information, shall be made publicly available through the Impact Registry.”

Provision 2  Source 3, Section 1.1.3: “Notwithstanding the paragraph 1.1.2 above, information used to carry out the following actions shall not be deemed confidential and be publicly disclosed:
  i. Demonstrate project additionality
  ii. Describe the application of the selected methodologies, standardized baselines, and other methodological regulations
  iii. Support Sustainable Development Impacts and Safeguarding Principles assessment
  In addition, data, values and formulae included in electronic spreadsheets provided shall be made publicly accessible and verifiable.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The project documentation shall be made available (Provision 1) and includes the project design document which includes information on the baseline scenario, additionality, and calculation of emission reductions (Source 2). Furthermore, Provision 2 explicitly states that information regarding additionality, the baseline and methodologies shall not be confidential. Confidential information is defined in Provision 3 of indicator 5.2.9. The indicator is thus fulfilled.

Scoring results

According to the above assessment, the carbon crediting program receives 8 out of 11 achievable points. Applying the scoring approach of the methodology, this results in a score of 3.64.