

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
Carbon crediting program:	ACR
Assessment based on carbon crediting program documents valid as of:	15 May 2022
Date of final assessment:	08 November 2022
Score:	1.65

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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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:
- Ensure that projects “do no harm” by maintaining compliance with local, national, and international laws and regulations;
 - Identify environmental and community risks and impacts and contributions to sustainable development;
 - Detail how negative environmental and community impacts will be avoided, reduced, mitigated, or compensated, and how mechanisms will be monitored, managed, and enforced;
 - Ensure that the rights of affected communities and other stakeholders are recognized, and that they have been fully and effectively engaged and consulted; and
 - Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.
- Provision 2 Source 1, section 8.A, page 49: “As part of the GHG Plan, ACR requires all projects to prepare and disclose an environmental and community impact assessment. Projects’ environmental and community impacts should be net positive. Project Proponents shall include in their GHG Project Plan a description of project impacts on communities and the environment in the immediate project area. This shall include changes in community well-being due to the Project Activity and an evaluation of any negative impacts on community groups. Project Proponents shall base these estimates on de-fined and defensible assumptions about how the Project Activity will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities, for the project duration. In the GHG Project Plan Project Proponents shall also identify and describe the Sustainable Development Goals to which those impacts are aligned and positively contribute.”

Assessment outcome

Yes (2 Points).

Justification of assessment

Provision 1 describes the general approach of the program to require project owners to adhere to environmental and social safeguards, including identification and mitigation of the impacts. Provision 2 further describes that the social impacts include impacts on stakeholder well-being. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8.A, page 49: “[..] Project Proponents shall include in their GHG Project Plan a description of project impacts on communities and the environment in the immediate project area. This shall include changes in community well-being due to the Project Activity and an evaluation of any negative impacts on community groups. Project Proponents shall base these estimates on defined and defensible assumptions about how the Project Activity will alter social and economic well-being, including potential impacts of changes in natural resources and ecosystem services identified as important by the communities, for the project duration. In the GHG Project Plan Project Proponents shall also identify and describe the Sustainable Development Goals to which those impacts are aligned and positively contribute.”
- Provision 2 Source 1, section 8.A, page 50: “The assessment should include the following:
1. An overview of the Project Activity and geographic location.
 2. Applicable laws, regulations, rules, and procedures and the associated oversight institutions.
 3. A description of the process to identify community(ies)²⁴ and other stakeholders²⁵ affected by the project and, as applicable, the community consultation and communications plan.
 4. An assessment of the project’s environmental risks and impacts, including factors such as climate change mitigation and adaptation, biodiversity, air quality, water quality, soil quality, and ozone quality, as well as the protection, conservation, or restora-

tion of natural habitats such as forests, grasslands, and wetlands. The assessment shall: 1) identify each risk/impact; 2) categorize the risk/impact as positive, negative, or neutral and substantiate the risk category; 3) describe how any negative impacts will be avoided, reduced, mitigated, or compensated; 4) detail how risks and impacts will be monitored, and how often and by whom; and 5) describe how positive impacts contribute to sustainable development goals.

5. For community-based projects, an assessment of the project's community risks and impacts, including factors such as land and natural resource tenure, land use and access arrangements, natural resource access (e.g., water, fuelwood), food security, land conflicts, economic development and jobs, cultural heritage, and relocation. The assessment shall: 1) briefly describe the process to identify community risks/impacts; 2) identify each risk/impact; 3) categorize the risk/impact as positive, negative, or neutral, and substantiate the risk category; 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed; 5) provide evidence of Free, Prior and Informed Consent for the Project Activity, as applicable; 6) provide evidence of no relocation or resettlement (voluntary or involuntary), as applicable; 7) describe how any negative project impacts will be avoided, reduced, mitigated, or compensated; 8) detail how risks/impacts will be monitored, and how often and by whom; 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable; and 10) describe how positive impacts contribute to sustainable development goals.

²⁴ As defined by CCBA, a community includes all groups of people, including indigenous peoples, mobile peoples, and other local communities, who live within or adjacent to the project area, as well as any groups that regularly visit the area and derive income, livelihood, or cultural values from the area. This may include one or more groups that possess characteristics of a community, such as shared history, shared culture, shared livelihood systems, shared relationships with one or more natural resources (e.g., forests, water, rangeland, wildlife), and shared customary institutions and rules governing the use of resources.”

Assessment outcome

Yes (1 Point).

Justification of assessment

Provision 1 describes the required assessment of environmental and social impacts more broadly, including for example ecosystem impacts and impacts on community well-being. Provision 2 details factors that need to be included in the assessment of environmental impacts and social/community impacts in case of community-based projects (as defined in the footnote). The provision does not only state the type of impacts that shall be considered but also requires that it is documented how they shall be assessed and mitigated. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “

4. An assessment of the project’s environmental risks and impacts, including factors such as [..]. The assessment shall: 1) identify each risk/impact [..] 4) detail how risks and impacts will be monitored, and how often and by whom [..].

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: [..] 8) detail how risks/impacts will be monitored, and how often and by whom; [..].”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires that the assessment of impacts by the project owners includes a description of who will monitor the impacts. This does, however, not represent an assignment of roles and responsibilities for managing environmental and social impacts as it is only about monitoring. The provisions would need to be expanded in this regard. The indicator is therefore not fulfilled.

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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

- 2 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:

- Ensure that projects “do no harm” by maintaining compliance with local, national, and international laws and regulations; “

Provision 2 Source 1, section 8.A, page 50: “The assessment should include the following:

- Applicable laws, regulations, rules, and procedures and the associated oversight institutions.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The above documentation specifies that the indicator is 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8.A, page 49: “As part of the GHG Plan, ACR requires all projects to prepare and disclose an environmental and community impact assessment.”
- Provision 2 Source 1, section 8.B, page 51: “Project Proponents shall disclose in their Monitoring Reports any negative environmental or community impacts or claims of negative environmental and community impacts and the appropriate mitigation measure applied. They shall also attest to no undisclosed or unmitigated adverse environmental or community impacts as a result of the project.”
- Provision 3 Source 1, section 3, page 25: “ACR requires that all projects develop and disclose an impact assessment to ensure compliance with environmental and community safeguards best practices.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program requires that the assessment of environmental and social impacts is disclosed (Provision 1 and 3). It is further specified for monitoring reports that project owners need to attest that they did not hide any negative impacts resulting from the project. 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 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>
- 2 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 1.B, page 10: “The overall goal of third-party validation is to review impartially and objectively a GHG Project Plan against the requirements laid out in the ACR Standard and relevant methodology. The VVB must independently evaluate the project design and planning information, based on supporting documentation and GHG validation best practices.”

Provision 2 Source 1, section 6.G, page 25: “To examine a Project Proponent’s claims of net positive community and environmental impacts, the VVB shall review publicly available information regarding the GHG project against the GHG Project Plan undergoing validation and the environmental community impact assessment; records of stakeholder consultations, if any; and results from methodologies and tools used for community and environmental impact analysis.

Net positive impacts, and the adequacy of community impact analysis and/or stakeholder consultations, are subjective criteria that are difficult to validate and verify. Therefore, the VVB is not required to provide a judgment on the adequacy of these processes or their qualitative results. However, it must confirm that the Project Proponent has evaluated community and environmental impacts, documented a mitigation plan for any foreseen negative community or environmental impacts, and disclosed any prior negative environmental or community impacts or claims of thereof.”

Provision 3 Source 2, section 6.B, page 36-37: “The GHG Project Plan shall use the ACR template and include the following information: [..]

- An environmental and community impact assessment, following ACR requirements, to ensure compliance with best practices and that safeguard measures are in place to avoid, mitigate, or compensate potential negative impacts, and how such measures will be monitored, managed, and enforced; and [..]”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires VVB to review information provided in the GHG Project Plan (Provision 1) which includes the environment and community impact assessments (Provision 3) and to check

whether they are in line with the requirements set out by the program (Provision 1). Despite the requirement to review the assessment (Provision 2, first paragraph), it is stated that “Net positive impacts, and the adequacy of community impact analysis and/or stakeholder consultations, are subjective criteria that are difficult to validate and verify”. Based on this statement, the program does not require the VVB to validate if the processes used are adequate or if the results of the impact assessments are qualitatively correct. The VVB are thus not required to check the actual content of the assessment and if it is reasonable, what was stated by project owners, but the VVB are required to check that the assessment was actually done and everything is documented and disclosed (Provision 2). As this only represents a formal control of the completeness of the documents, the indicator cannot be considered to be fulfilled.

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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.B, page 51: “Project Proponents shall disclose in their Monitoring Reports any negative environmental or community impacts or claims of negative environmental and community impacts and the appropriate mitigation measure applied. They shall also attest to no undisclosed or unmitigated adverse environmental or community impacts as a result of the project.”

Provision 2 Source 1, section 8.A, page 50: “4. An assessment of the project’s environmental risks and impacts, including factors such as [..]. The assessment shall: 1) identify each risk/impact; 2) categorize the risk/impact as positive, negative, or neutral and substantiate the risk category; 3) describe how any negative impacts will be avoided, reduced, mitigated, or compensated; 4) detail how risks and impacts will be monitored, and how often and by whom; and 5) describe how positive impacts contribute to sustainable development goals.

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 1) briefly describe the process to identify community risks/impacts; 2) identify each risk/impact; 3) categorize the risk/impact as positive, negative, or neutral, and substantiate the risk category; 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed; 5) provide evidence of Free, Prior and Informed Consent for the Project Activity, as applicable; 6) provide

evidence of no relocation or resettlement (voluntary or involuntary), as applicable; 7) describe how any negative project impacts will be avoided, reduced, mitigated, or compensated; 8) detail how risks/impacts will be monitored, and how often and by whom; 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable; and 10) describe how positive impacts contribute to sustainable development goals.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program requires that project owners shall describe how negative social and environmental impacts are avoided, mitigated or compensated (Provision 2) and that negative impacts, and appropriate mitigation measures, are also included in the monitoring reports (Provision 1). 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8.B, page 51: “Project Proponents shall disclose in their Monitoring Reports any negative environmental or community impacts or claims of negative environmental and community impacts and the appropriate mitigation measure applied. They shall also attest to no undisclosed or unmitigated adverse environmental or community impacts as a result of the project.”
- Provision 2 Source 1, section 6.E, page 38: “Project monitoring reports shall be completed for each verified reporting period using the template for Project Monitoring Report¹⁹.”
- Provision 3 Source 1, section “Definitions”, page 71-72: “Reporting Period. The period of time covering a GHG assertion that is submitted for a single verification and subsequent request for ERT issuance. Unless otherwise noted in a methodology, there is no minimum length and the maximum length is 5 years.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program requires that negative social and environmental impacts are monitored (Provision 1) throughout the crediting period of the project (Provision 2 and 3). 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 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>
- 2 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

No such provisions were found. The indicator is 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 11.A, page 60: “When a Project Proponent or ACR stakeholder objects to a decision made by ACR representatives or the application of the ACR program requirements, the following confidential complaint procedure shall be followed:

1. Project Proponent or ACR stakeholder sends a written complaint via email to ACR@winrock.org. The complaint must detail the following:
 - Description of the complaint with specific reference to ACR Standard and/or ACR Methodology requirements, as applicable;
 - Supporting documentation provided for consideration by ACR in the complaint resolution process; and
 - Complainant name, contact details, and organization.
2. ACR Senior Management shall assign an ACR representative to research and further investigate the complaint. The representative assigned to handle the complaint shall not have been involved with the issue that is the subject of the formal complaint.
3. ACR Senior Management will provide a written response, via email, to the complainant detailing ACR’s decision on the matter.”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program has a grievance mechanism in place and the respective procedure is described in Provision 1. The provisions require that the complaints are duly considered by the program staff. The carbon crediting program clarified through written correspondence that this grievance mechanism can be used broadly for all projects under the program and throughout the lifetime of a project. While this confirmation leads to a fulfilment of the indicator, it is recommended that the respective provision in the ACR standard is clarified by explicitly stating that the grievance

mechanism does not only handle complaints about decisions made by ACR but is also available to stakeholders to raise a complaint in relation to a project.

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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 2 American Carbon Registry Monitoring Report. Version 4.0. Online available at: <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/tools-templates>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:
5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable; and [..]”
- Provision 2 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:
- Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.”
- Provision 3 Source 2, section 4, page 2: “Environmental and Community Impacts. Instructions:
- In their GHG Project Plan Projects must prepare and disclose an assessment of its environmental and community risks and impacts (per 8.A of the ACR Standard).
 - The assessment must describe the safeguard measures in place to avoid, reduce, mitigate, or compensate for potential negative impacts, and how such impacts will be reported, monitored and enforced. The assessment must identify and describe the Sustainable Development Goals (SDG) to which the impacts are aligned and positively contribute.
 - Please provide confirmations and/or updates, as applicable, to the original assessment including the SDG goals to which the impacts are aligned and positively contribute.

- Projects Proponents are required to disclose at each verification any negative environmental and/or community impacts or claims of negative environmental and/or community impacts and the appropriate mitigation measure applied.
- Please provide the required environmental and community impact disclosures below, as applicable. “

Assessment outcome

No (0 Points).

Justification of assessment

The program requires that project owners set up a grievance mechanism (Provision 1 and 2). In correspondence with the carbon credit program, the program clarified that grievances can be submitted throughout the lifetime of the project. This could though be made clearer in Provision 1 or 2. Additionally, no provisions could be found that the grievance mechanism shall be culturally appropriate and that grievances must be duly considered by the project owner. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable; and [..]”

Provision 2 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:

- Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.”

Assessment outcome

No (0 Points).

Justification of assessment

The grievance mechanism that project owners need to establish does not have to provide the possibility to submit grievances anonymously. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable; and [..]”

Provision 2 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:

- Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.”

Provision 3 Source 1, section 11.A, page 60: “When a Project Proponent or ACR stakeholder objects to a decision made by ACR representatives or the application of the ACR program requirements, the following confidential complaint procedure shall be followed:

1. Project Proponent or ACR stakeholder sends a written complaint via email to ACR@winrock.org. The complaint must detail the following:
 - Description of the complaint with specific reference to ACR Standard and/or ACR Methodology requirements, as applicable;
 - Supporting documentation provided for consideration by ACR in the complaint resolution process; and
 - Complainant name, contact details, and organization.

2. ACR Senior Management shall assign an ACR representative to research and further investigate the complaint. The representative assigned to handle the complaint shall not have been involved with the issue that is the subject of the formal complaint.

3. ACR Senior Management will provide a written response, via email, to the complainant detailing ACR’s decision on the matter.”

Assessment outcome

No (0 Points).

Justification of assessment

Neither the grievance mechanism of the carbon crediting program nor the grievance mechanism required by project owners includes a provision of a specific response time. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies)²⁴ and other stakeholders²⁵ affected by the project and, as applicable, the community consultation and communications plan.

[..]

²⁴ As defined by CCBA, a community includes all groups of people, including indigenous peoples, mobile peoples, and other local communities, who live within or adjacent to the project area, as well as any groups that regularly visit the area and derive income, livelihood, or cultural values from the area. This may include one or more groups that possess characteristics of a community, such as shared history, shared culture, shared livelihood systems, shared relationships with one or more natural resources (e.g., forests, water, rangeland, wildlife), and shared customary institutions and rules governing the use of resources.

²⁵ Other stakeholders are defined as groups other than communities that 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

Although the phrasing of Provision 1 (“description of the process to identify community(ies) and other stakeholders”) formally only requires project owners to describe the process to identify local stakeholders, this implies that local stakeholders which are impacted by the project are generally identified. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:

- Ensure that the rights of affected communities and other stakeholders are recognized, and that they have been fully and effectively engaged and consulted; and [..]”

Provision 2 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies)²⁴ and other stakeholders²⁵ affected by the project and, as applicable, the community consultation and communications plan.

[..]

²⁴ As defined by CCBA, a community includes all groups of people, including indigenous peoples, mobile peoples, and other local communities, who live within or adjacent to the project area, as well as any groups that regularly visit the area and derive income, livelihood, or cultural values from the area. This may include one or more groups that possess characteristics of a community, such as shared history,

shared culture, shared livelihood systems, shared relationships with one or more natural resources (e.g., forests, water, rangeland, wildlife), and shared customary institutions and rules governing the use of resources.

²⁵ Other stakeholders are defined as groups other than communities that can potentially affect or be affected by the Project Activities and who may live within or outside the Project Zone.”

Provision 3 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as land and natural resource tenure, land use and access arrangements, natural resource access (e.g., water, fuelwood), food security, land conflicts, economic development and jobs, cultural heritage, and relocation.”

Assessment outcome

Yes (1 Point).

Justification of assessment

As a principle, Provision 1 highlights that rights of affected stakeholders shall be recognized. The footnote and definition of communities in Provision 2 further specifies that stakeholders are included which share “customary institutions and rules governing the use of resources”. Also, land tenure, land use and access arrangements are assessed as part of the social impact assessment (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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 2 American Carbon Registry Methodology for Afforestation and Reforestation of Degraded Lands. Version 1.2. Document issued May 2017. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/afforestation-and-reforestation-of-degraded-lands/acr-ar-of-degraded-land-v1-2-2017.pdf>
- 3 American Carbon Registry Methodology for Landfill Gas Destruction and Beneficial Use Projects. Version 2.0. Document issued April 2021. Online available at: https://americancarbonregistry.org/carbon-accounting/standards-methodologies/landfill-gas-destruction-and-beneficial-use-projects/lfg-methodology-v2-f_2021-05-05.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies) and other stakeholders affected by the project and, as applicable, the community consultation and communications plan.

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: [..] 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed;”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires the documentation of the stakeholder consultation (Provision 1) but does not prescribe how the consultation shall be conducted. While affected communities/stakeholders need to be identified for all projects (paragraph 3, Provision 1), a stakeholder consultation is only required if community-based stakeholders of the project are identified (paragraph 3 and 5). Upon communication with the program, it was clarified that this means that if no communities in the immediate project area are impacted by the project activity, a consultation is not necessary (e.g. industrial projects). Further, methodologies for project types that require a public consultation explicitly state this requirement. The methodologies of the relevant project types (Source 2 and 3) do, however, not include such a requirement. As there is no general requirement for conducting a stakeholder consultation (and also not specifically for the relevant project types), the indicator is not 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 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>

- 2 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 3 Template for ACR Offset Project Listing Form. Version 2.0. Online available at: <https://acr.soliton.consulting/carbon-accounting/guidance-tools-templates>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 1.B, page 10: “The overall goal of third-party validation is to review impartially and objectively a GHG Project Plan against the requirements laid out in the ACR Standard and relevant methodology. The VVB must independently evaluate the project design and planning information, based on supporting documentation and GHG validation best practices.”
- Provision 2 Source 1, section 6.G, page 25: “To examine a Project Proponent’s claims of net positive community and environmental impacts, the VVB shall review publicly available information regarding the GHG project against the GHG Project Plan undergoing validation and the environmental community impact assessment; records of stakeholder consultations, if any; and results from methodologies and tools used for community and environmental impact analysis. “
- Provision 3 Source 2, section 6.B, page 36-37:” The GHG Project Plan shall use the ACR template and include the following information:
- Relevant outcomes from any stakeholder consultations and mechanisms for ongoing communication, as applicable;”
- Provision 4 Source 2, section 6.A, page 35: “Project Proponent using an ACR-approved methodology shall proceed per the following sequence of steps:
1. Project Proponent submits a GHG Project Listing Form using the template found at www.americancarbonregistry.org.
 2. ACR reviews the GHG Project Listing Form for completeness, and a compatibility check with the ACR Standard, at fees per the currently published ACR fee schedule.¹⁶ This screening results in (a) Project Listing with approval to proceed to Validation/Verification Body (VVB) selection, (b) requests for clarifications or corrections, or (c) rejection because the project is ineligible or does not meet requirements of the ACR Standard. If the ACR screening includes requests for clarifications or corrections, the Project Proponent may re-submit the GHG Project Listing Form for further review. ACR reserves the right to accept or reject a GHG Project Listing at any time and for any reason during the review. A project is considered to be listed once the GHG Project Listing Form is approved. The project listing information and form will then be made public on ACR.
 3. Having received listing approval to proceed to VVB selection, the Project Proponent selects an ACR-approved independent third-party VVB to validate the GHG Project Plan and verify the Project’s GHG assertions for the first reporting period as presented in the monitoring report. The VVB shall submit to ACR a Conflict of Interest self-evaluation form for review. ACR must approve the VVB selection prior to the start of

validation and verification services based on proper accreditation, conflict of interest review, and VVB rotation requirements¹⁷.”

- Provision 5 Source 2, section “Definitions”, page 69: “Listing. The process by which a Project Proponent submits a draft GHG Project Plan to ACR for review, the successful outcome of which results in the project being approved for listing as a project on the ACR platform. ACR’s review and subsequent approval of a project listing is not a project certification, nor does it take the place of a successful validation and verification.”
- Provision 6 Source 2, section “Definitions”, page 72: “ For non-AFOLU projects, the date on which the project began to reduce GHG emissions against its baseline. For AFOLU projects, the date on which the Project Proponent began the activity on project lands, with more specific guidance in the relevant ACR sector-specific requirements.”

Assessment outcome

No (0 Points).

Justification of assessment

The carbon crediting program requires that stakeholder consultations shall be documented in the GHG Project Plan (Provision 3). A first draft of this plan needs to be submitted in the first step of the project cycle called “Listing” (Provision 4 and 5). After Listing, this document will be reviewed by the VVB (Provision 1 and 2), which includes the review of records from the consultations.

There are no provisions that require project developers to list projects before the decision to proceed with the project. Restrictions apply only in relation to the start date, which is defined as the date on which the project began to reduce GHG emissions against its baseline (Provision 6 and Source 3).

The provision that stakeholder consultations must be documented in the draft GHG Project Plan is therefore not considered to meet the requirements of the indicator.

The program fulfils the second part of the indicator by requiring project developers to include relevant outcomes from any stakeholder consultations in the GHG Project Plan (Provision 3). Projects can only move to validation by submitting a GHG Project Plan (Provision 4), which implies that stakeholder consultations must be conducted before validation. However, stakeholder consultations are only required where impacts on a community or local stakeholders are identified (see indicator 6.1.17).

The indicator is therefore not sufficiently 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 2 Public Registry of the American Carbon Registry. Accessible at: <https://acr2.apx.com/myModule/rpt/myrpt.asp?r=111>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies) and other stakeholders affected by the project and, as applicable, the community consultation and communications plan.

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: [..] 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed;”

Provision 2 Source 1, section 6.B, page 36-37:” The GHG Project Plan shall use the ACR template and include the following information:

Relevant outcomes from any stakeholder consultations and mechanisms for ongoing communication, as applicable;”

Assessment outcome

Yes (1 Point).

Justification of assessment

If impacted communities are identified (indicator 6.1.7), the program requires that project owners take due account of inputs from the local stakeholder consultation (Provision 1). The inputs and how they are addressed shall be documented in the GHG Project Plan (Provision 1 and 2) which is publicly available in the project registry for each project (Source 2). 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 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>
- 2 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 1.B, page 10: “The overall goal of third-party validation is to review impartially and objectively a GHG Project Plan against the requirements laid out in the ACR Standard and relevant methodology. The VVB must independently evaluate the project design and planning information, based on supporting documentation and GHG validation best practices.”
- Provision 2 Source 1, section 6.G, page 25: “To examine a Project Proponent’s claims of net positive community and environmental impacts, the VVB shall review publicly available information regarding the GHG project against the GHG Project Plan undergoing validation and the environmental community impact assessment; records of stakeholder consultations, if any; and results from methodologies and tools used for community and environmental impact analysis.”
- Provision 3 Source 2, section 6.B, page 36-37:” The GHG Project Plan shall use the ACR template and include the following information:

Relevant outcomes from any stakeholder consultations and mechanisms for ongoing communication, as applicable;”
- Provision 4 Source 1, section 8.A, page 50: 5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: [..] 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed;”

Assessment outcome

Yes (1 Point).

Justification of assessment

The program requires that the VVB reviews the GHG Project Plan (Provision 1) which includes records from stakeholder consultations (Provision 2 and 3) which in turn include stakeholder comments and how those were addressed (Provision 4). 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies) and other stakeholders affected by the project and, as applicable, the community consultation and communications plan.

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: [..] 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed;”

Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision found. The indicator is not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies)²⁴ and other stakeholders²⁵ affected by the project and, as applicable, the community consultation and communications plan.

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as land and natural resource tenure, land use and access arrangements, natural resource access (e.g., water, fuelwood), food security, land conflicts, economic development and jobs, cultural heritage, and relocation. The assessment shall: 1) briefly describe the process to identify community risks/impacts; 2) identify each risk/impact; [..] 5) provide evidence of Free, Prior and Informed Consent for the Project Activity, as applicable;

²⁴ As defined by CCBA, a community includes all groups of people, including indigenous peoples, mobile peoples, and other local communities, who live within or adjacent to the project area, as well as any groups that regularly visit the area and derive income, livelihood, or cultural values from the area. This may include one or more groups that possess characteristics of a community, such as shared history, shared culture, shared livelihood systems, shared relationships with one or more natural resources (e.g., forests, water, rangeland, wildlife), and shared customary institutions and rules governing the use of resources.

²⁵ Other stakeholders are defined as groups other than communities that can potentially affect or be affected by the Project Activities and who may live within or outside the Project Zone.”

Assessment outcome

Yes (2 Points).

Justification of assessment

The program requires that indigenous people are identified as part of the stakeholder identification and impact assessment (Provision 1, footnote). There is also a requirement to provide evidence for free, prior and informed consent for the project activity. Although not directly referenced, this implies that free, prior and informed consent shall also be obtained from indigenous people. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[.]

3. A description of the process to identify community(ies) and other stakeholders affected by the project and, as applicable, the community consultation and communications plan.

[.]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable;”

Assessment outcome

No (0 Points).

Justification of assessment

The program does require that mechanisms for ongoing communication are described (Provision 1), but there is no requirement that the ongoing communication should take place in a manner appropriate to the context of the stakeholders and that project owners take due account of input received. The indicator is therefore not 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 (6.1.12) have been addressed is made publicly available or made available upon request.”

Information sources considered

- 1 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 2 American Carbon Registry Monitoring Report. Version 4.0. Online available at: <https://americancarbonregistry.org/carbon-accounting/guidance-tools-templates/tools-templates>
- 3 Public Registry of the American Carbon Registry. Accessible at: <https://acr2.apx.com/myModule/rpt/myrpt.asp?r=111>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 6.B, page 36-37:” The GHG Project Plan shall use the ACR template and include the following information:
- Relevant outcomes from any stakeholder consultations and mechanisms for ongoing communication, as applicable;”
- Provision 2 Source 1, section 8.A, page 50: “The assessment should include the following:
- [..]
3. A description of the process to identify community(ies) and other stakeholders affected by the project and, as applicable, the community consultation and communications plan.
- [..]
5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed; [..] 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable;”
- Provision 3 Source 1, section 3, page 25: “ACR requires that all projects develop and disclose an impact assessment to ensure compliance with environmental and community safeguards best practices.”
- Provision 4 Source 2, section IX, page 5: “Any comments that were received from stakeholders regarding environmental or community impacts during the development, construction, operation and/or maintenance of the Project have been addressed, and when necessary, response actions have been implemented by the Project Proponent, and a true and accurate summary of any and all such communications/actions is attached hereto (as available).”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires that environmental and social impacts assessments are disclosed (Provision 1). The description of the stakeholder consultation as well as mechanisms for ongoing communication and grievances are described in the GHG Project Plan which is publicly available (Provision 1 and 2). In the publicly available monitoring report (Source 3), project owners are required to attest that any comments received are addressed, and how they were addressed, from the initial stakeholder consultation and during the operation of the project (Provision 4). The requirement to document “a true and accurate summary of any and all such communications/actions” (Provision 4) is considered to correspond to documenting all inputs – from consultations, ongoing communication and grievances as per the indicator. However, the latter provisions is constrained by the wording “as available” at the end of the provision – which is not defined and indicates that the documentation of the inputs is not required in all cases. The indicator is therefore not 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 American Carbon Registry Validation and Verification Standard. Version 1.1. Document issued 01 May 2018. Online available at: <https://americancarbonregistry.org/carbon-accounting/verification/verification>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 1.B, page 10: “The overall goal of third-party validation is to review impartially and objectively a GHG Project Plan against the requirements laid out in the ACR Standard and relevant methodology. The VVB must independently evaluate the project design and planning information, based on supporting documentation and GHG validation best practices.”

Provision 2 Source 1, section 6.G, page 25: “To examine a Project Proponent’s claims of net positive community and environmental impacts, the VVB shall review publicly available information regarding the GHG project against the GHG Project Plan undergoing validation and the environmental community impact assessment; records of stakeholder consultations, if any; and results from methodologies and tools used for community and environmental impact analysis.

Net positive impacts, and the adequacy of community impact analysis and/or stakeholder consultations, are subjective criteria that are difficult to validate and verify. Therefore, the VVB is not required to provide a judgment on the adequacy of these processes or their qualitative results. However, it must confirm that the Project Proponent has evaluated community and environmental impacts, documented a mitigation plan for any foreseen negative community or environmental impacts, and disclosed any prior negative environmental or community impacts or claims of thereof.”

Assessment outcome

No (0 Points).

Justification of assessment

The program does not require explicitly that VVB engage with affected local stakeholders. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 7.A, page 45: “Current versions of methodologies published by ACR via the public consultation and peer review process are approved without qualification.”

Provision 2 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

3. A description of the process to identify community(ies)²⁴ and other stakeholders²⁵ affected by the project and, as applicable, the community consultation and communications plan.

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 4) provide detailed information regarding the community stakeholder consultation process (e.g., meeting minutes, attendees), including documentation of stakeholder comments and concerns and how those are addressed; [..] 9) describe the mechanism for ongoing communications with the community and grievance mechanisms, as applicable;”

²⁴ As defined by CCBA, a community includes all groups of people, including indigenous peoples, mobile peoples, and other local communities, who live within or adjacent to the project area, as well as any groups that regularly visit the area and derive income, livelihood, or cultural values from the area. This may include one or more groups that possess characteristics of a community, such as shared history, shared culture, shared livelihood systems, shared relationships with one or more natural resources (e.g.,

forests, water, rangeland, wildlife), and shared customary institutions and rules governing the use of resources.

²⁵ Other stakeholders are defined as groups other than communities that can potentially affect or be affected by the Project Activities and who may live within or outside the Project Zone.”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires global, public consultation only for new methodologies (Provision 1). For projects, consultations foreseen by the program target local communities and stakeholders affected by the project (Provision 2). The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision found, as global public consultations of projects are not prescribed by the program (indicator 6.1.26). The indicator is not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision found, as global public consultations of projects are not prescribed by the program (indicator 6.1.26). The indicator is not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision found, as global public consultations of projects are not prescribed by the program (indicator 6.1.26). The indicator is not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 11.A, page 60: “When a Project Proponent or ACR stakeholder objects to a decision made by ACR representatives or the application of the ACR program requirements, the following confidential complaint procedure shall be followed:

1. Project Proponent or ACR stakeholder sends a written complaint via email to ACR@winrock.org. The complaint must detail the following:

- Description of the complaint with specific reference to ACR Standard and/or ACR Methodology requirements, as applicable;
- Supporting documentation provided for consideration by ACR in the complaint resolution process; and
- Complainant name, contact details, and organization.

2. ACR Senior Management shall assign an ACR representative to research and further investigate the complaint. The representative assigned to handle the complaint shall not have been involved with the issue that is the subject of the formal complaint.

3. ACR Senior Management will provide a written response, via email, to the complainant detailing ACR’s decision on the matter.”

Provision 2 Source 1, section 8.B, page 51: “ACR reserves the right to refuse to list or issue credits to a project based on community or environmental impacts that have not or cannot be mitigated, or that present a significant risk of future negative environmental or community impacts.”

Provision 3 Source 1, section 6.A, page 35: “2. ACR reviews the GHG Project Listing Form for completeness, and a compatibility check with the ACR Standard [..]. ACR reserves the right to accept or reject a GHG Project Listing at any time and for any reason during the review.”

Assessment outcome

No (0 Points).

Justification of assessment

There are general provisions that allow the program to reject any project listing or to refuse credit issuance on the basis of environmental and social impacts (Provision 2 and 3). While there is an option for stakeholders to submit complaints to the program (Provision 1), there is no provision detailing the program's due consideration of the comments received and possible action to address the concern from the grievance mechanism explicitly (e.g., halting the issuance of credits, deregistering the project, or requiring compensation for over-issuance). The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision on the violation of human rights found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There were no provisions on cultural heritage found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There were no specific provisions regarding health found. The indicator is therefore not fulfilled.

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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

5. For community-based projects, an assessment of the project’s community risks and impacts, including factors such as [..]. The assessment shall: 5) provide evidence of Free, Prior and Informed Consent for the Project Activity, as applicable; 6) provide evidence of no relocation or resettlement (voluntary or involuntary), as applicable; 7) describe how any negative project impacts will be avoided, reduced, mitigated, or compensated;”

Assessment outcome

No (0 Points).

Justification of assessment

The program requires evidence that no voluntary or involuntary relocation or resettlement has occurred in the context of the project (Provision 1). However, the provision is confusing due to the addition of “as applicable” which questions the mandatory nature of the provision. Limiting the provision through the term “as applicable” is confusing and might open this requirement for interpretation. It is therefore recommended to remove it from the provision. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There were no specific provisions regarding labour rights found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 8.A, page 50: “The assessment should include the following:

[..]

4. An assessment of the project’s environmental risks and impacts, including factors such as climate change mitigation and adaptation, biodiversity, air quality, water quality, soil quality, and ozone quality, as well as the protection, conservation, or restoration of natural habitats such as forests, grasslands, and wetlands. The assessment shall: 1) identify each risk/impact; 2) categorize the risk/impact as positive, negative, or neutral and substantiate the risk category; 3) describe how any negative impacts will be avoided, reduced, mitigated, or compensated; 4) detail how risks and impacts will be monitored, and how often and by whom; and 5) describe how positive impacts contribute to sustainable development goals.”

Assessment outcome

No (0 Points).

Justification of assessment

The assessment and mitigation of negative impacts include water/soil/air pollution and biodiversity (Provision 1). The management of waste is not mentioned in the provisions. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 8, page 49: “ACR requires that projects adhere to environmental and community safeguards best practices to:
- Ensure that ongoing communications and grievance redress mechanisms are in place, and that affected communities will share in the project benefits.”
- Provision 2 Source 2, section 8.A, page 49: “As part of the GHG Plan, ACR requires all projects to prepare and disclose an environmental and community impact assessment. Projects’ environmental and community impacts should be net positive.”

Assessment outcome

No (0 Points).

Justification of assessment

Generally, the program requires that environmental and community impacts result in a net benefit (Provision 2). However, this cannot be regarded as a dedicated benefit-sharing mechanism as demanded by this indicator. Provision 1 includes the requirement that “affected communities will share in the project benefits” – it is however not further defined what this share entails as the word “benefit” is used for different positive impacts (also environmental benefits) throughout the document. A specific reference to financial benefits, like “part of the carbon credit proceeds” as in the indicator, would be clearer. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There were no specific provisions regarding invasive species found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There were no specific provisions regarding the involvement of experts in safeguard process found. 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3, page 25: “ACR does not require that a particular process or tool be used for the impact assessment as long as basic requirements defined by ACR are addressed (See Chapter 8). ACR projects can follow internationally recognized approaches such as The World Bank Safeguard Policies, or can be combined with the Climate Community and Biodiversity Alliance (CCBA) Standard or the Social Carbon Standard for the assessment, monitoring, and reporting of environmental and community impacts.”

Assessment outcome

No (0 Points).

Justification of assessment

The program does not provide specific guidance on how safeguards and impact assessments shall be done but instead formulates basic requirements and refers to internationally recognized approaches. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>
- 2 Winrock Gender Equity and Social Inclusion (GESI) Policy. Online available at: <https://code.winrock.org/gender-equity-and-social-inclusion/>

Relevant carbon crediting program provisions

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Assessment outcome

Yes (1 Point).

Justification of assessment

The carbon credit program belongs to Winrock, an international nonprofit organization, which has a dedicated gender policy (Source 2). There is no reference to the gender policy in the main standard document (Source 1) which could be added in future revisions of the document. The indicator is therefore fulfilled.

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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

No such provisions were found. The indicator is therefore not 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 American Carbon Registry Standard. Version 7.0. Document issued December 2020. Online available at: <https://americancarbonregistry.org/carbon-accounting/standards-methodologies/american-carbon-registry-standard>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

No such provisions were found. The indicator is therefore not fulfilled.

Scoring results

According to the above assessment, the carbon crediting program achieves a total point score of 15 for the indicators. Applying the scoring approach in the methodology, this results in a score of 1.65 for the criterion.