

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 with complementary standard:	ACR + CCBS
Project type:	Establishment of natural forests
Assessment based on carbon crediting and complementary standard program documents valid as of:	15 May 2022
Date of final assessment:	08 November 2022
Score:	3.84

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Assessment

This document presents the results of the assessment of sub-criterion 6.1 for the combination of the American Carbon Registry (ACR) and Verra's Climate, Community & Biodiversity Standards (CCBS).

Approach to assessing combinations of carbon crediting programs with complementary standards

For assessing the combination of a carbon crediting program with a complementary standard, the following approach was taken:

1. The carbon crediting program and the complementary standard were assessed separately against all indicators of sub-criterion 6.1. The results of these two individual assessments are available in separate documents on the CCQI website.
2. When assessing the combination of the carbon crediting program with a complementary standard, there are three possible outcomes for each indicator:
 - a. Both the carbon crediting program and the complementary standard fulfill the indicator;
 - b. Either the carbon crediting program or the complementary standard fulfills the indicator;
 - c. Neither the carbon crediting program nor the complementary standard fulfills the indicator.
3. For assessment outcomes falling in categories a. and b., the indicator was deemed to be fulfilled for the combination of the carbon crediting program and the complementary standard and no further assessment was conducted.
4. For assessment outcomes falling into category c., an additional assessment was made whether the relevant provisions of the carbon crediting program and the complementary standard fulfill the indicator when looking at them in combination.

Scope of this assessment

This document presents the results of the additional assessment conducted when neither the carbon crediting program nor the complementary standard individually fulfill an indicator (assessment outcomes falling into category c. as described above).

To facilitate the navigation through this document, the table on the following page provides an overview which of the three categories presented above applies for each of the indicators of sub-criterion 6.1.

In this document, assessments are only provided for indicators that fall into category c. For all other indicators, the individual assessments for ACR and CCBS apply for deriving the respective indicator score of the combination (see respective detailed evaluations for sub-criterion 6.1 for ACR and CCBS on the CCQI website).

Indicator	Outcome category for the indicator (see explanation above)
6.1.1	b
6.1.2	a
6.1.3	b
6.1.4	b
6.1.5	a
6.1.6	a
6.1.7	b
6.1.8	a
6.1.9	a
6.1.10	c
6.1.11	b
6.1.12	b
6.1.13	c
6.1.14	c
6.1.15	a
6.1.16	a
6.1.17	b
6.1.18	c
6.1.19	a
6.1.20	a
6.1.21	c
6.1.22	a
6.1.23	b
6.1.24	b
6.1.25	c
6.1.26	b
6.1.27	b
6.1.28	b
6.1.29	b
6.1.30	b
6.1.31	c
6.1.32	b
6.1.33	b
6.1.34	c
6.1.35	b
6.1.36	c
6.1.37	b
6.1.38	b
6.1.39	c
6.1.40	b
6.1.41	b
6.1.42	b
6.1.43	c

Indicator 6.1.10

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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>
- 3 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 provision for ACR and CCBS were found that include a requirement to explicitly set up an environmental and social management plan for projects with high risks. The indicator is therefore not fulfilled.

Indicator 6.1.13

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 G3, page 18-19: “Feedback and Grievance Redress Procedure.

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

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

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

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

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

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

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

Provision 2 Source 2, section 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 3 Source 2, 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 (Provision 2 and 3) under ACR does not have to provide the possibility to submit grievances anonymously. The provisions of CCBS for grievance mechanisms of project owners do not include the possibility to submit anonymous grievances either (Provision 1). The indicator is therefore not fulfilled.

Indicator 6.1.14

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 3 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 G3, page 18-19: “Feedback and Grievance Redress Procedure.

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

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

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

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

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

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

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

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

7.1 Complaints.

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

1) The complaint shall include the following information:

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

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

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

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

Provision 3 Source 3, 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 4 Source 3, 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 5 Source 3, 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 (Provision 3-5).

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

Indicator 6.1.18

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 2 CCB Validation Report Template. Version 3.0. Document issued on 21 June 2017. Online available at: <https://verra.org/project/ccb-program/rules-requirements-and-guidance/>
- 3 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>
- 4 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>
- 5 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>
- 6 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 G3, page 17: “Consultation.

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

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

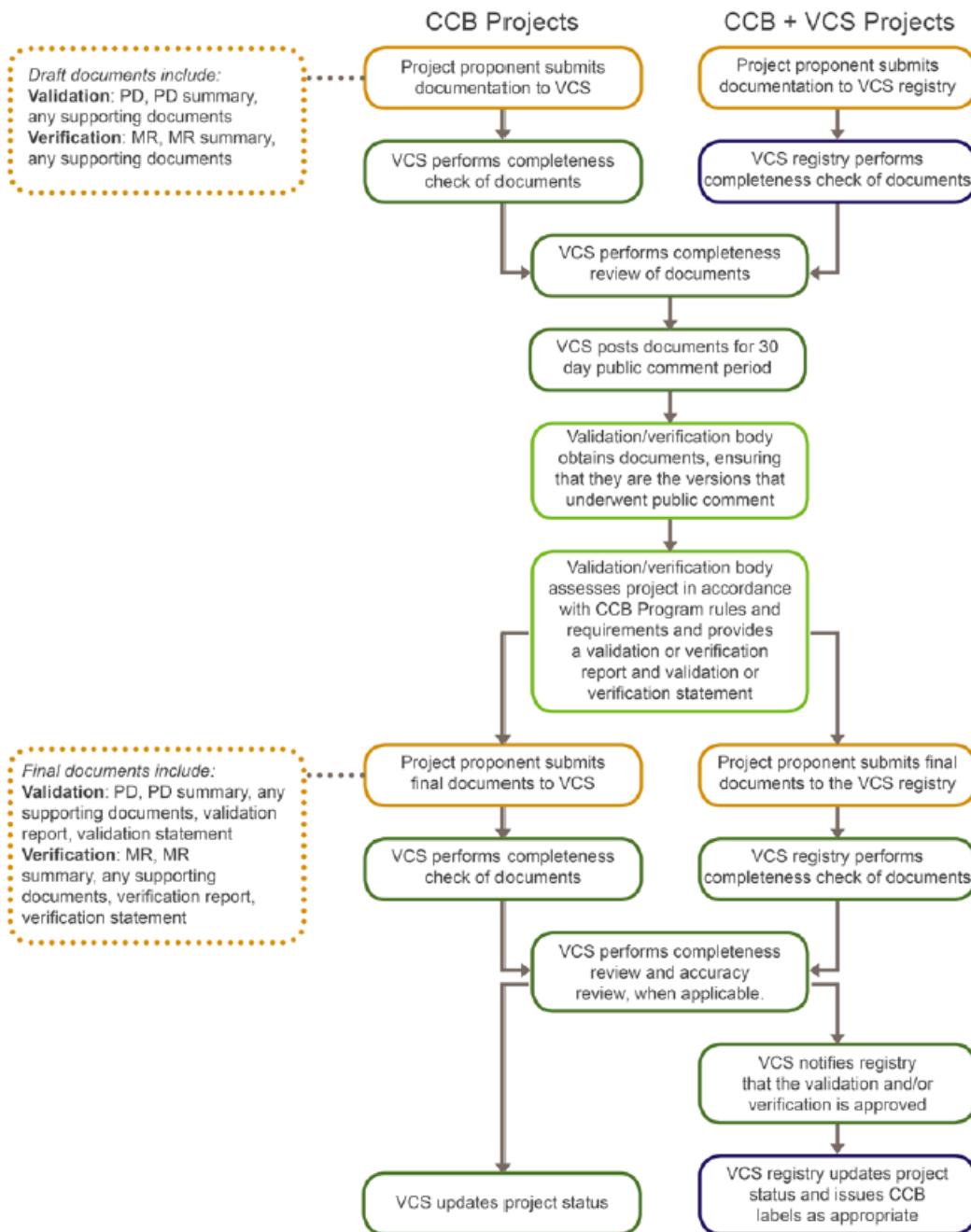
⁴⁵ In cases where it is unclear whether a project will be implemented or not, it is acceptable to start with preliminary consultations, provided there are plans for appropriate full consultations before the start of the project. Where conformance with the Climate, Community & Biodiversity Standards is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

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

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

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

Diagram 2: Validation of Project Design and Verification of Successful Project Implementation



Provision 4 Source 4, 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 5 Source 4, 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 6 Source 5, 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 7 Source 5, 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 8 Source 5, 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 9 Source 5, 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 6). A first draft of this plan needs to be submitted in the first step of the project cycle called “Listing” (Provision 7 and 8). After Listing, this document will be reviewed by the VVB (Provision 4 and 5), 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 9 and Source 6).

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 6). Projects can only move to validation by submitting a GHG Project Plan (Provision 7), 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 CCBS requires that consultations are conducted before the project design document is submitted in order to provide input on the project design both before the project design is finalized and during implementation (Provision 1). This includes, for example, that the project owner would have to consult stakeholders if any further changes to the project design occur after the initial posting for validation public comment. As part of the validation process, the stakeholder consultations are reviewed and thus have to be conducted before validation (Provision 2 and 3). The requirement to conduct the stakeholder consultations before submission of the PDD does however not constitute a requirement to conduct the stakeholder consultations before the decision to proceed with the project as there are no time restrictions on when a PDD can be submitted. The CCBS can for example also be obtained by an already existing project (Provision 1). The indicator is therefore not fulfilled.

Indicator 6.1.21

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 G3, page 16:” “Access to Information.

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

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

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

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

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

Provision 3 Source 2, 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 provision found for ACR on making key information available. The complementary standard requires that key information, including the project description, is made available to local stakeholders (Provision 1). It is also required that information on potential impacts is provided in a “timely manner”. While it is foreseen that stakeholders shall have the opportunity to “evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design” (Provision 2) in order to influence project design and implementation, it is not stated explicitly, that key documents will be shared before the consultations are conducted. This could be made clearer in the provisions. The indicator is thus considered to not be fulfilled by the combination of ACR with CCBS.

Indicator 6.1.25

Relevant scoring methodology provisions

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

Information sources considered

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

- Provision 1 Source 1, section 4.3.13, page 24: “Validation and verification audits shall include a visit to the project site. The purpose of the site visit is to confirm the validity of the written project description or monitoring report and to ensure that the project meets the rules and requirements of the CCB Program. The on-site audit process normally includes interviews with project proponents and stakeholders, and a review of supporting records, documents and reports.”
- Provision 2 Source 2, 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 3 Source 2, 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

ACR does not require explicitly that VVB engage with affected local stakeholders.

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

Indicator 6.1.31

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 G3, page 18: “Describe the measures needed and taken to ensure that the project proponent and all other entities involved in project design and implementation are not involved in or complicit in any form of discrimination⁴⁷ or sexual harassment with respect to the project.

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

Assessment outcome

No (0 Points).

Justification of assessment

There was no such provision of ACR on the violation of human rights found. The complementary standard bans any form of discrimination, but does not explicitly ban any violation of human rights (Provision 1). Therefore, the indicator is considered not to be fulfilled by the combination of ACR with CCBS.

Indicator 6.1.34

Relevant scoring methodology provisions

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

Information sources considered

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

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

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

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

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

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

1) Describe and map statutory and customary⁶¹ tenure/use/access/management rights to lands, territories and resources in the project zone including individual and collective rights and including overlapping or conflicting rights. If applicable, describe measures needed and taken by the project to help to secure statutory rights. Demonstrate that all property rights are recognized, respected and supported.

2) Demonstrate with documented consultations and agreements that:

a) The project will not encroach uninvited on private property, community property,⁶² or government property,

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

c) Appropriate restitution or compensation has been allocated to any parties whose lands have been or will be affected by the project.⁶⁵

3) Demonstrate that project activities do not lead to involuntary removal or relocation of property rights holders from their lands or territories and does not force them to relocate activities important to their culture or livelihood. If any relocation of habitation or activities is undertaken within the terms of an agreement, the project proponents must demonstrate that the agreement was made with the free, prior and informed consent of those concerned and includes provisions for just and fair compensation.⁶⁶

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

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

⁶³ In conformance with the United Nations Declaration on the Rights of Indigenous Peoples and International Labour Organization (ILO) Convention 169. The following manual can be used for guidance on Free, Prior and Informed Consent: Anderson, 2011, Free, Prior and Informed Consent in REDD+: Principles and Approaches for Policy and Project Development (available at <http://www.recoftc.org>). If non-contacted peoples are located or believed to be located in the project area, their right to remain in isolation should be respected in accordance with local, national and international laws and recommendations. Unless invited to make contact, implementing entities should not engage in any activities that may impact these populations, including project activities. There should be a buffer zone between the project area and the area in which indigenous populations living in voluntary isolation reside, or are believed to reside. Guidelines for the Protection of Indigenous Peoples in Voluntary Isolation and Initial Contact in the Amazon Region, the Gran Chaco and the Eastern Region of Paraguay, Office of the United Nations High Commissioner (OHCHR) and the Spanish Agency for International Cooperation and Development, May 2012.

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

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

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

Provision 3 Source 2, 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

ACR requires evidence that no voluntary or involuntary relocation or resettlement has occurred in the context of the project (Provision 3). 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 complementary standard requires that no involuntary relocations shall occur (Provisions 1 and 2). If relocations or removals occur, free, prior and informed consent by affected people shall be ensured as well as appropriate compensation (Provisions 1 and 2). The standard does not have an explicit requirement that displacement shall be avoided, and only allowed in exceptional circumstances. The indicator is therefore not fulfilled by the combination of ACR with CCBS.

Indicator 6.1.36

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 B1, page 41: "Indicators.

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

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

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

i) Protected areas¹¹⁴

ii) Threatened species¹¹⁵

iii) Endemic species¹¹⁶

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

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

c) Threatened or rare ecosystems.¹¹⁸

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

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

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

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

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

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

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

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

[..]

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

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

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

Indicators.

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

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

Provision 4 Source 2, 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 under ACR (Provision 4). The management of waste is not mentioned in the provisions

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

The indicator is therefore considered to be not sufficiently fulfilled by the combination of ACR with CCBS.

Indicator 6.1.39

Relevant scoring methodology provisions

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

OR

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 G4., page 20: “Management capacity. Concept.

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

Indicators.

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

Assessment outcome

No (0 Points).

Justification of assessment

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

Indicator 6.1.43

Relevant scoring methodology provisions

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

Information sources considered

- 1 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf
- 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 G3, page 18: “Anti-Discrimination.

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

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

Assessment outcome

No (0 Points).

Justification of assessment

There were no relevant ACR provisions found. Provision 1 of CCBS not only prescribes that any form of discrimination, including discrimination based on gender, shall be banned but that project owners describe the measures needed and taken to ensure this. However, this provision does not explicitly require a systematic assessment of where discrimination based on gender might occur. The indicator is therefore not fulfilled by the combination of ACR with CCBS.

Scoring results

According to the above assessment, none of the indicators, for which neither the carbon crediting program nor the complementary standard received points in their individual assessment, are fulfilled when looking at their provisions in combination. The assessment of these indicators therefore yields no additional points. When combining these assessment results with the individual assessments from both the carbon crediting program and the complementary standards (for indicators in categories a and b), this results in a total point score of 34 for the combination of the carbon crediting program and complementary standard. Applying the scoring approach in the methodology, this results in a score of 3.84 for this criterion.