

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:	Gold Standard + CCB
Project type:	Establishment of natural forests
Assessment based on carbon crediting program and complementary standard documents valid as of:	30 June 2021
Date of final assessment:	08 November 2022
Score:	4.88

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Assessment

This document presents the results of the assessment of sub-criterion 6.1 for the combination of the Gold Standard (GS) 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 GS and CCBS apply for deriving the respective indicator score of the combination (see respective detailed evaluations for sub-criterion 6.1 for GS and CCBS on the CCQI website).

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

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 Gold Standard Safeguarding principles & requirements. Version 1.2. Document issued on 9 October 2019. Online available at: <https://globalgoals.goldstandard.org/103-par-safeguarding-principles-requirements/>.
- 2 Gold Standard Principles & Requirements. Version 1.2. Document issued in October 2019. Online available at: <https://globalgoals.goldstandard.org/101-par-principles-requirements/>.
- 3 Gold Standard Claims Guidelines. Version 1.0. Document issued on 30 June 2016. Online available at: <https://globalgoals.goldstandard.org/105-par-claims-guidelines/>.
- 4 TEMPLATE GUIDE Monitoring Report v. 1.1. Document issued on 14 October 2020. Online available at: https://globalgoals.goldstandard.org/standards/TGuide-PerfCert_V1.1-Monitoring-Report.pdf.
- 5 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 2.1.11, Table 2 “Safeguarding Assessment Information”, page 5-6: “The Project shall provide the following information with regards to the Safeguarding Assessment at different project stages; [...] A completed Safeguarding Principles Assessment fully assessed by the Gold Standard Validation/Verification Body (GS-VVB). The monitoring report shall include:
- (a) An update on the implementation including information on relative success and failures, or improvements to proposed mitigation measures
 - (b) Monitoring and reporting on any key indicators identified, including against pre-set tolerances
 - (c) Information on any assessment questions answered ‘Potentially’ or where Requirements call for regular re-assessment”
- Provision 2 Source 2, section 2.2.1, page 5: “Gold Standard Certified Project status is achieved by successfully undergoing Verification and performance review (Performance Certification), which means:
- (a) The project has followed a Monitoring Plan approved at the time of Design Certification and has submitted Monitoring Report for Verification.
 - (b) The project and its Certified SDG Impacts have been validated and verified as required by an accredited, approved third party VVB.

(c) Following this, the project has been reviewed by Gold Standard and is subject to an over-arching independent review by the Gold Standard Technical Advisory Committee (TAC) and NGO Supporters.”

Provision 3 Source 4, section F: “Safeguards reporting”; page 15: “Provide a report on the Safeguarding principles that were added to the monitoring plan. Refer to parameter boxes in D.2. where applicable. You should include:

(a) An update on the implementation including information on relative success and failures, or improvements to proposed mitigation measures

(b) Monitoring and reporting on any key indicators identified, including against pre-set tolerances

(c) Information on any assessment questions answered ‘Potentially’ or where Requirements call for regular re-assessment”

Assessment outcome

No (0 Points).

Justification of assessment

While the GS requires the inclusion of safeguards in the monitoring plan and subsequent reports, there are no provisions that require a dedicated environmental and social management plan for projects that have high environmental and social risks. The CCBS has also no such provisions in place. The indicator is 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 Gold Standard Stakeholder Consultation and Engagement Requirements. Version 1.2. Document issued in October 2019. Online available at: <https://globalgoals.goldstandard.org/102-par-stakeholder-consultation-requirements/>.
- 2 The Climate, Community & Biodiversity Standards. Version 3.1. Document issued on 21 June 2017. Online available at: https://verra.org/wp-content/uploads/2017/12/CCB-Standards-v3.1_ENG.pdf

Relevant carbon crediting program provisions

Provision 1 Source 1, section 7.1.1, page 6: “All projects shall setup a formal input, feedback and grievance mechanism with the purpose of providing stakeholders with an opportunity to submit any feedback or raise grievances during the entire project life.”

- Provision 2 Source 1, section 7.1.2, page 6: “The project shall discuss the potential options with stakeholders and agree on an appropriate method.”
- Provision 3 Source 1, section 7.1.3, page 6: “At a minimum, Continuous Input and Grievance Expression Process Book shall be made available at an agreed location.”
- Provision 4 Source 2, section G3, page 18-19: “Feedback and Grievance Redress Procedure.

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

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

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

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

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

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

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

Assessment outcome

No (0 Points).

Justification of assessment

The carbon crediting program provisions require project owners to discuss potential options for the grievance mechanism with the stakeholders and jointly agree on an appropriate method for submitting and processing grievances (Provision 2). In principle, this would allow stakeholders to agree on procedures that allow for anonymous submission of feedback and grievances. It is however not a prescriptive requirement by the program to provide for this option. The CCBS provisions for grievance mechanisms of project owners does not include the possibility to submit anonymous grievances. The indicator is therefore not fulfilled.

Indicator 6.1.25

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 Gold Standard Principles & Requirements. Version 1.2. Document issued in October 2019. Online available at: <https://globalgoals.goldstandard.org/101-par-principles-requirements/> .
- 2 Gold Standard Validation / Verification Body Requirements. Version 2.0. Document issued in January 2021. Online available at https://globalgoals.goldstandard.org/standards/109_V2.0_PAR_Validation-Verification-Body-Requirements.pdf
- 3 The Climate, Community & Biodiversity Program Rules. Version 3.1. Document issued on 21 June 2017. Online available at: <https://verra.org/wp-content/uploads/2018/04/CCB-Program-Rules-v3.1.pdf>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 5.1.14, page 23: “Validation includes a site visit by a VVB who assesses the up-front design and monitoring plan for a Project against applicable Requirements. This includes Validation of:
- (a) The Project Documentation including the Project Design Document and Monitoring & Reporting Plan, including any updates to the Key Project Information after Listed Status has achieved.
 - (b) Any supporting document and evidence to demonstrate conformity to all applicable Gold Standard Requirements.”
- Provision 2 Source 2, section 7.6.5.1, page 16: “A validator or verifier shall have auditing knowledge and skills and the ability to apply them to perform validation or verification/certification activities including:
- a. Data, information and system auditing techniques and methodologies;
 - b. Risk assessment techniques and methodologies;
 - c. Data and information sampling techniques and methodologies;
 - d. Application of the concepts of materiality and level of assurance;
 - e. Collection of information through effective interviewing, listening, observing and reviewing documents, records and data;
 - f. Verification of the accuracy of collected information, evaluation of the sufficiency and appropriateness of gathered evidence to support validation or verification/certification findings and conclusions;
 - g. Preparation of validation or verification/certification opinions and reports.”

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

Assessment outcome

No (0 Points).

Justification of assessment

The carbon crediting program requires that all project documentation is validated during the validation and verification process. By extension this includes also the stakeholder consultation report (Provision 1). Knowledge and skill required by VVBs include “Collection of information through effective interviewing, listening, observing and reviewing documents, records and data” (Provision 2). However, there is no explicit provision that requires that validation and verification entities contact and engage with affected local stakeholders during validation. The validation process in the CCBS “normally” includes interviews with stakeholders as a way to engage with stakeholders (Provision 3). 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.

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 43 for the combination of the carbon crediting program and complementary standard. Applying the scoring approach in the methodology, this results in a score of 4.88 for this criterion.