

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

This document presents results from the application of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF) 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 <u>Site terms and Privacy Policy</u> 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: <u>www.carboncreditquality.org</u>

Criterion:	6.1 Robustness of the carbon crediting program's environmental and social safeguards
Carbon crediting program:	VCS + SDVISta
Assessment based on carbon crediting programs valid as of:	15 May 2022
Date of final assessment:	31 January 2023
Score:	AFOLU: 2.92 Non-AFOLU: 2.69

Contact info@oeko.de www.oeko.de

Head Office Freiburg P. O. Box 17 71 79017 Freiburg

Street address Merzhauser Straße 173 79100 Freiburg Phone +49 761 45295-0

Office Berlin Borkumstraße 2 13189 Berlin Phone +49 30 405085-0

Office Darmstadt Rheinstraße 95 64295 Darmstadt Phone +49 6151 8191-0

Assessment

This document presents the results of the assessment of sub-criterion 6.1 for the combination of the Verified Carbon Standard (VCS) and Verra's Sustainable Development Verified Impact Standard (SDVISta).

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 fulfils 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 subcriterion 6.1.

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

Indicator	Outcome category for the indicator (see explanation above)
6.1.1	a
6.1.2	С
6.1.3	С
6.1.4	b/c
6.1.5	а
6.1.6	b
6.1.7	а
6.1.8	а
6.1.9	b
6.1.10	С
6.1.11	С
6.1.12	a/b
6.1.13	С
6.1.14	С
6.1.15	a/b
6.1.16	b
6.1.17	a/b
6.1.18	C
6.1.19	а
6.1.20	a
6.1.21	C
6.1.22	a/b
6.1.23	a/b
6.1.24	a/b
6.1.25	C
6.1.26	а
6.1.27	а
6.1.28	а
6.1.29	а
6.1.30	а
6.1.31	С
6.1.32	С
6.1.33	С
6.1.34	С
6.1.35	b
6.1.36	С
6.1.37	C
6.1.38	b/c
6.1.39	C
6.1.40	C
6.1.41	C
6.1.42	b
6.1.43	C
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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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 SDVISta Project Description Template. Version 1.0. Document issued 22 January 2019. Online available at: <u>https://verra.org/project/sd-vista/rules-requirements/</u>
- 3 SDVISta Monitoring Report Template. Version 1.0. Document issued 22 January 2019. Online available at: <u>https://verra.org/project/sd-vista/rules-requirements/</u>
- 4 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.1, page 14: "3.1.1 The following shall be included in the project description for each of the stakeholder groups identified in Section 2.2.2 above:

- Conditions at the project start date with respect to social, economic and cultural diversity within and between the stakeholder groups and the interactions between stakeholder groups.
- 2) Significant changes in these elements the past.

This information represents the project's baseline scenario for People and their Prosperity.

3.1.2 Project proponents shall monitor impacts depicted in the causal chain of a project's activities on all stakeholder groups. Benefits, costs and risks to all stakeholder groups shall be identified using a participatory and transparent process. [..]

3.1.4 The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including:

- 1) Changes in stakeholders' well-being due to project activities. This appraisal should include documentation of any activities intended to mitigate negative impacts to stakeholder groups.
- Any SDG target(s) associated with people and their prosperity identified in Section 2.1.2 above and any stakeholders' well-being benefits that will be used as SD VISta claims or assets."

Provision 2 Source 1, section 3.2, page 15: "3.2.1 Conditions and possible threats to natural capital at the project start date shall be documented in the project description. This information represents the project's baseline scenario for Planet.

3.2.2 Project proponents shall monitor direct impacts depicted in a causal chain of a project's activities on natural capital and ecosystem services, including expected and actual, benefits, costs and threats. To the extent that there are stakeholders of the natural capital and/or ecosystem services affected by the project, these benefits, costs and risks should be identified with them using a participatory and transparent process.

[..]

3.2.4 The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including:

1) Changes in natural capital and ecosystem services due to project activities. This appraisal should include documentation of any activities intended to mitigate negative impacts on natural capital and ecosystem services.

2) Any SDG target(s) associated with the planet identified in Section 2.1.2 above and any natural capital and ecosystem services benefits that will be used as SD VISta claims or assets.

- Provision 2 Source 4, section 3.16, page 39: "Project activities shall not negatively impact the natural environment or local communities. Project proponents shall identify and address any negative environmental and socio-economic impacts of project activities and shall engage with local stakeholders during the project development and implementation processes."
- Provision 3 Source 4, section 3.16.1: "No Net Harm. The project proponent shall identify potential negative environmental and socio-economic impacts and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or removals."

Assessment outcome

No (0 Points).

Justification of assessment

The VCS requires the project owner to identify and address any negative environmental and socioeconomic impacts of the project (Provision 2 and 3). The VCS does not provide a list of potential negative impacts that all projects must at a minimum assess. It therefore relies mainly on the project owner and validator to consider all relevant impacts that might be associated with a specific project or not. A predefined list of impacts is considered to provide more assurance that impacts will be considered as it serves as a guide to project owners what impacts must at a minimum be assessed.

Like the VCS, the types of impacts to be identified and mitigated are not clearly listed in SDVISta provisions. Instead, it is up to the project owner to define the impact categories in the project description or monitoring template (Source 2 and 3). The standard, however, prescribes that "impacts depicted in the causal chain of a project's activities on all stakeholder groups" and "on

natural capital and ecosystem services" shall be identified and mitigated (Provision 1 and 2). Regarding social impacts, Provision 1 further refers to "benefits, costs and risks to all stakeholder groups" as well as any "changes in stakeholders' well-being due to project activities". Regarding environmental impacts, Provision 2 further refers to "expected and actual, benefits, costs and threats". These provisions do not represent a clear definition or listing of the impacts.

The indicator is therefore not fulfilled for the combination of the carbon crediting program and the complementary standard.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 2.3, page 9: "Principle. Project proponents shall ensure that sufficient human, financial and organizational resources are available for effective sustainable development benefit delivery per a project's design. Criteria.
 2.3.1 Project proponents shall document in the project description, and update in monitoring reports as may be appropriate, distinct roles and responsibilities of all the entities involved in project design and implementation."
- Provision 2 Source 2, section 3.16, page 39: "Project activities shall not negatively impact the natural environment or local communities. Project proponents shall identify and address any negative environmental and socio-economic impacts of project activities and shall engage with local stakeholders during the project development and implementation processes."
- Provision 3 Source 2, section 3.16.1: "No Net Harm. The project proponent shall identify potential negative environmental and socio-economic impacts and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission."

Assessment outcome

No (0 Points).

Justification of assessment

VCS requirements exist that the project proponent shall identify and address social and environmental risks (Provision 2 and 3), but it is not explicitly required that the roles and responsibilities to manage these risks are assigned. The complementary standard requires that project owners document in the project descriptions and the monitoring reports roles and responsibilities of project design and implementation (Provision 1). Although the latter theoretically include the identification and mitigation of environmental and social safeguards (Indicator 6.1.1), the provision to assign roles and responsibilities could be strengthened and elaborated to make it clear that project owners need to explicitly assign roles/responsibilities for the management of environmental and social impacts.

The indicator is thus considered to be not fulfilled by the combination of VCS and SDVISta.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 2.3, page 9: "Principle. Project proponents shall ensure that sufficient human, financial and organizational resources are available for effective sustainable development benefit delivery per a project's design."
- Provision 2 Source 2, section 3.16.15, page 42 (on AFOLU projects): "The management teams involved in the project shall have expertise and prior experience implementing land management and carbon projects with community engagement at the project scale. Where relevant experience is lacking, the project proponent shall either demonstrate how they have partnered with other organizations to support the project or have a recruitment strategy to fill the identified gaps."

Assessment outcome

AFOLU: Yes (1 Point).

Non-AFOLU: No (0 Points).

Justification of assessment

This indicator assesses whether the carbon crediting program assesses the institutional capacities of the project owner to identify and manage the environmental and social risks associated with the project. Managing environmental and social risks is often a complex process that requires expert knowledge and the ability to proactively engage with a wide set of stakeholders with sometimes competing interests. Project owners who have institutionalized environmental and social risk management processes and can rely on established in-house capacities (or established and dependable networks with external expertise) are likely better positioned to ensure that safeguards are adhered to during project implementation. Expertise and prior experience in implementing land management carbon projects with community engagement at the project scale is required at least for AFOLU projects under VCS (Provision 1). However, this does not apply for other project types.

While the SDVISta requires project owners to have sufficient "resources" to deliver the sustainable development benefits (Provision 1), no requirements matching the indicator were identified during the assessment of relevant SDVISta provisions. The indicator is therefore only fulfilled if SDVISta is applied to AFOLU projects under VCS.

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

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Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The VCS has no relevant provisions. While SDVISta requires the inclusion of safeguards in the monitoring plan etc. (Indicator 6.1.9), there are no provisions that require a dedicated environmental and social management plan for projects that have high environmental and social risks. The indicator is not fulfilled by the combination of the carbon crediting program and the complementary standard.

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 Verra Complaints and Appeals Policy- Version 1.0. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Verra-Complaints-and-Appeals-Policy-v1.0.pdf</u>
- 2 SD VISta Program Guide, version 1.0, 22 January 2019. Online available at: https://verra.org/wp-content/uploads/2019/01/SD-VISta-Program-Guide-v1.0.pdf

Relevant carbon crediting program provisions

- Provision 1 Source 2, section 5 "Complaints and Appeals", page 38: "Project proponents, assessors, methodology element developers and other stakeholders (including interested stakeholders) may submit enquiries to Verra at any time. In addition, the SD VISta Program provides a complaints and appeals procedure as set out in the Verra Appeals, Complaints and Conduct Policy available on the Verra website."
- Provision 2 Source 1, section 1 "Complaints", page 2: "Complaints by stakeholders about a project proponent or its partners shall be pursued with the respective entity. Similarly, complaints about entities (by the clients of such entities) that provide services under the relevant Verra program, such as assessors, shall be pursued via the respective entity. In either of the cases above, where the complaint is not resolved to the satisfaction of the complainant and the complaint is in relation to the respective entity's interpretation of the relevant program rules, the complainant may submit a complaint to Verra. Note that other stakeholders may also choose to submit complaints to entities providing services under the relevant program where such entities have complaints procedures for third parties (i.e., non-clients)."
- Provision 3 Source 1, section 1 "Complaints", page 1: "A complaint is an objection to a decision taken by Verra or an aspect of how it operates a program(s) managed by Verra, or a claim that relevant program rules have had an unfair, inadvertent or unintentional adverse effect. 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, where 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 appropriate program manager listed on the Verra website and emailed to secretariat@verra.org with the word complaint in the subject line. An email response is provided to the complainant from Verra acknowledging receipt of the complaint.

3) Verra 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) Verra prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the Verra Chief Executive Officer (CEO).

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

- Provision 4 Source 1 (continued): "All expenses, internal and external, incurred by Verra in handling complaints and appeals shall be paid by the entity filing the complaint or appeal. Prior to initiation of the handling process, Verra will inform the entity filing the complaint or appeal of its estimated handling cost. Where the outcome of a complaint or appeal is to overturn an earlier decision made by Verra, the entity filing the complaint or appeal will not be liable for covering such expenses."
- Provision 5 Source 2, section 3.2, page 10: "Projects shall undergo at least one 30-day public comment period per assessment (i.e., per validation, verification and independent expert evaluation). While a project is open for comment, stakeholders (including interested stakeholders) are invited to provide feedback on the design or implementation of a project, either from personal knowledge or as the design or implementation is represented in the project description or monitoring report."

Assessment outcome

No (0 points).

Justification of assessment

For SDVISta specifically, comments or complaints can be submitted at any time (Provision 1).

SDVISta uses the complaints and appeals policy provided by Verra, and thus as VCS (Provision 1) which sets out the procedure and rules for submitting complaints to the program. These stipulate that complaints about a project must be pursued first with the project owner. Only when the complaint cannot be resolved to the satisfaction of the complainant it may be submitted to Verra (Provision 2). Upon receipt, the program appoints an appropriate person to handle the complaint, and afterwards prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the Verra CEO (Provision 3). Complainants must however bear the cost of the complaint if it does not result in overturning an earlier decision made by Verra (Provision 4). The latter is considered a considerable barrier for accessing the grievance mechanism as for example the capacity of vulnerable local people bearing the cost of such a complaint procedure is low. The indicator is therefore not fulfilled.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.2, page 8: "Grievance Redress Procedure.

2.2.14 Projects shall establish a clear feedback and grievance redress procedure to address disputes with stakeholders that may arise during project planning and implementation. The feedback and grievance redress procedure shall take into account traditional methods that stakeholders use to resolve conflicts.

2.2.15 The feedback and grievance redress procedure shall be set out in the project description as well as publicized and accessible to all project stakeholders, including any interested stakeholders. Grievances and project responses, including any redress, shall be documented in the next project description or monitoring report."

Provision 2 Source 2, section 3.16.18 "AFOLU Projects – Communication and consultation", page 43: "The project proponent shall develop a grievance redress procedure to address disputes with local stakeholders that may arise during project planning and implementation, including with regard to benefit sharing. The procedure shall include processes for receiving, hearing, responding and attempting to resolve grievances within a reasonable time period, taking into account culturally appropriate conflict resolution methods. The procedure and documentation of disputes resolved through the procedure shall be made publicly available. The procedure shall have three stages:

1) 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.

2) Any grievances that are not resolved by amicable negotiations shall be referred to mediation by a neutral third party.

3) 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." Provision 3 Source 2, section 3.16.19, page 43: "All communication and consultation shall be performed in a culturally appropriate manner, including language and gender sensitivity, directly with local stakeholders or their legitimate representatives when appropriate. The results of implementation shall be provided in a timely manner and consultation shall be performed prior to design decisions or implementation to allow stakeholders adequate time to respond to the proposed design or action."

Assessment outcome

No (0 Points).

Justification of assessment

Under VCS, the respective provisions do not mention the option to submit anonymous grievances (Provision 2 and 3). SDVISta does not require the option to provide anonymous feedback or grievances to project owners either (Provision 1). The indicator is therefore not fulfilled by the combination of the carbon crediting program and the complementary standard.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 Verra Complaints and Appeals Policy- Version 1.0. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Verra-Complaints-and-Appeals-Policy-v1.0.pdf</u>
- 3 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.2.15, page 8: "Grievance Redress Procedure. [..]

The feedback and grievance redress procedure shall be set out in the project description as well as publicized and accessible to all project stakeholders, including any interested stakeholders. Grievances and project responses, including any redress, shall be documented in the next project description or monitoring report."

Provision 2 Source 2, section 1 "Complaints", page 1: "A complaint is an objection to a decision taken by Verra or an aspect of how it operates a program(s) managed by Verra, or a claim that relevant program rules have had an unfair, inadvertent or unintentional adverse effect. 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, where 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 appropriate program manager listed on the Verra website and emailed to secretariat@verra.org with the word complaint in the subject line. An email response is provided to the complainant from Verra acknowledging receipt of the complaint.

3) Verra 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) Verra prepares a written response and provides this to the complainant. The response to the complaint is brought to the attention of and approved by the Verra Chief Executive Officer (CEO).

Provision 3 Source 3, Section 3.16.18 "AFOLU Projects – Communication and consultation", page 43: "AFOLU. [..] The project proponent shall develop a grievance redress procedure to address disputes with local stakeholders that may arise during project planning and implementation, including with regard to benefit sharing. The procedure shall include processes for receiving, hearing, responding and attempting to resolve grievances within a reasonable time period, taking into account culturally appropriate conflict resolution methods. The procedure and documentation of disputes resolved through the procedure shall be made publicly available."

Assessment outcome

No (0 Points).

Justification of assessment

Grievances received by the project owner need to be document in the next project description or monitoring report for SDVISta (Provision 1). However, the phrasing in Provision 1 is unclear whether project owners are required to respond to all grievances. There is also no specific response time given for grievances submitted to the program (Verra) (Provision 2). If SDVISta is used in combination with VCS for land-based projects, the respective AFOLU VCS Provisions may apply. However, the relevant provisions of VCS regarding requirements for grievance mechanisms in AFOLU projects require that grievances must be responded to within a "reasonable time period" but without defining a specific response time (Provision 3). The indicator is therefore not fulfilled for the combination of the carbon crediting program and the complementary standard.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 2.2, page 7: "Box 3: Guidance on Effective Consultation. [..] Stakeholder groups should have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design, both before the project design is finalized and during implementation."
- Provision 2 Source 2, section 2.3.3, page 5: "Stakeholder Consultation.

Describe the steps taken to assess the project's process for conducting effective consultation. Provide an assessment as to whether:

- The project's process was appropriate for each stakeholder group;
- Information about potential costs, risks and benefits was appropriately shared with each group;
- Each group had an opportunity to influence project design; and
- The project dedicated particular attention to optimizing benefits for any marginalized and vulnerable groups.

Provide and justify an overall conclusion regarding the project's process for conducting effective stakeholder consultations."

- Provision 3 Source 2, section 3.16.2 General, page 40: "The project proponent shall conduct a local stakeholder consultation prior to validation as a way to inform the design of the project and maximize participation from stakeholders. Such consultations allow stakeholders to evaluate impacts, raise concerns about potential negative impacts and provide input on the project design. The project proponent shall establish mechanisms for ongoing communication with local stakeholders to allow stakeholders to raise concerns about potential negative impacts."
- Provision 4 Source 2, section 3.16.4, page 40: "The project proponent shall take due account of all and any input received during the local stakeholder consultation and through ongoing communications, which means it will need to either update the project design

or justify why updates are not appropriate. The project proponent shall demonstrate to the validation/verification body what action it has taken in respect of the local stakeholder consultation as part of validation, and in respect of ongoing communications as part of each subsequent verification."

- Provision 5 Source 2, section 3.7 "Project Start Date", page 25: "The project start date of a non-AFOLU project is the date on which the project began generating GHG emission reductions or removals. The project start date of an AFOLU project is the date on which activities that led to the generation of GHG emission reductions or removals are implemented (e.g., preparing land for seeding, planting, changing agricultural or forestry practices, rewetting, restoring hydrological functions, or implementing management or protection plans). Projects shall complete validation within specific timeframes from the project start date."
- Provision 6 Source 2, section 3.7.1, page 25: "Non-AFOLU projects shall complete validation within two years of the project start date. Additional time is granted for non-AFOLU projects to complete validation where they are applying a new VCS methodology. Specifically, projects using a new VCS methodology and completing validation within two years of the approval of the methodology by Verra may complete validation within four years of the project start date."
- Provision 7 Source 2, section 3.7.3, page 25: "AFOLU projects shall complete validation within five years of the project start date."

Assessment outcome

No (0 Points).

Justification of assessment

The complementary standard requires that consultations are conducted before the project design is finalized and during implementation in order to provide input on the project design (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). Project developers can however make an internal decision to proceed (i.e. invest) in a project before finalising the project design. The provision therefore does not meet the requirement of the indicator to conduct stakeholder consultation before this decision.

To generate carbon credits, the SDVISta needs to be combined with other carbon crediting programs. The VCS requires that project owners conduct a stakeholder consultation before validation and demonstrate to the VVB what action it has taken in respect of the local stakeholder consultation as part of validation (Provision 3 and 4). This aspect of the indicator is therefore considered to be fulfilled. The program, however, does not require project owners to conduct the consultations before the decision to proceed with the project. Validation must be finalized within two years of the project start date (Provision 6) and within 5 years of the start date for AFOLU projects (Provision 7). Start date is defined by the carbon crediting program as the date on which the project began generating GHG emission reductions or removals (Provision 5). These rules would allow for stakeholder consultations to take place after the project start date and thus do not fulfil this aspect

of the indicator. The indicator is therefore considered not to be fulfilled by the combination of VCS with SDVISta.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 2.2, page 7: "Box 3: Guidance on Effective Consultation. [..] Stakeholder groups should have an opportunity to evaluate impacts and raise concerns about potential negative impacts, express desired outcomes and provide input on the project design, both before the project design is finalized and during implementation."
- Provision 2 Source 1, section 2.2.6, page 7: "All communications, consultations and participatory processes shall be undertaken with stakeholders directly or through their legitimate representatives, ensuring adequate and timely levels of information sharing with the members of the stakeholder groups in a form they understand. Information sharing shall include provision of information about potential costs, risks and benefits to all stakeholder groups."
- Provision 3 Source 2, section 3.16.2 "Local Stakeholder Consultation", page 40: "The project proponent shall conduct a local stakeholder consultation prior to validation as a way to inform the design of the project and maximize participation from stakeholders. Such consultations allow stakeholders to evaluate impacts, raise concerns about potential negative impacts and provide input on the project design."
- Provision 4 Source 2, section 3.16.17 "AFOLU projects", page 42: "The project proponent shall take all appropriate measures to communicate and consult with local stakeholders in an ongoing process for the life of the project. The project proponent shall communicate:
 - 1) The project design and implementation, including the results of monitoring.
 - 2) The risks, costs and benefits the project may bring to local stakeholders.

3) All relevant laws and regulations covering workers' rights in the host country.

4) The process of VCS Program validation and verification and the validation/verification body's site visit."

Provision 5 Source 2, section 3.16.19 "AFOLU Projects", page 42: "All communication and consultation shall be performed in a culturally appropriate manner, including language and gender sensitivity, directly with local stakeholders or their legitimate representatives when appropriate. The results of implementation shall be provided in a timely manner and consultation shall be performed prior to design decisions or implementation to allow stakeholders adequate time to respond to the proposed design or action."

Assessment outcome

No (0 Points).

Justification of assessment

VCS provisions addressing stakeholder consultation requirements for general projects (Provision 3) do not contain any specific requirements to make key documentation available before the consultation takes place. For AFOLU projects, the program stipulates what the project owner must communicate to local stakeholders. However, no requirements apply with regard to the timing of when the information must be made available (Provision 4). The provisions for AFOLU projects do contain a requirement to perform consultations prior to design decisions or implementation to allow stakeholders adequate time to respond to the proposed design or action (Provision 5). It is not fully clear whether this constitutes a requirement to make information available prior to the stakeholder consultations as such.

SDVISta Provision 1 states that stakeholders shall have the opportunity to influence the project design but does not explicitly include a requirement for sharing documents before the consultation. Provision 2 requires "timely levels of information sharing" which also does not explicitly require – and might only imply that – project owners have to share the project design document and other relevant documents before the consultation. Further, the requirement to share "information about potential costs, risks and benefits to all stakeholder groups" does not necessarily include the sharing of the project design document. The standard's provisions could be strengthened and clarified regarding this indicator.

The indicator is thus considered to not be fulfilled by the combination of VCS with SDVISta.

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 SDVISta Validation Report Template. Version 1.0. Document issued on 25 September 2019. Online available at: <u>https://verra.org/project/sd-vista/rules-requirements/</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 1.9, page 2: "1.9 Site Inspections.

Describe the method and objectives for on-site inspections performed. Include in the description details of all project activity locations visited, the physical and organizational aspects of the project inspected and the dates when such site inspections took place."

Provision 2 Source 1, section 2.3, page 4: "2.3.1 Stakeholder Identification.

Describe the steps taken to assess the process of stakeholder identification and analysis used to identify stakeholders and stakeholder groups. Include details of documentation assessed and observations made during the site visit. Provide a conclusion as to whether the process is likely to identify all stakeholders who will be impacted by the project activities.

2.3.2 Stakeholder Description.

Describe the steps taken to assess that all stakeholders and stakeholder groups that are included in the project, or may be included through the grouped project approach at a later time, were identified and described appropriately in the project description.

2.3.3 Stakeholder Consultation.

Describe the steps taken to assess the project's process for conducting effective consultation. Provide an assessment as to whether:

- The project's process was appropriate for each stakeholder group;
- Information about potential costs, risks and benefits was appropriately shared with each group;
- Each group had an opportunity to influence project design; and
- The project dedicated particular attention to optimizing benefits for any marginalized and vulnerable groups.

Provide and justify an overall conclusion regarding the project's process for conducting effective stakeholder consultations."

Assessment outcome

No (0 Points).

Justification of assessment

The VCS has no relevant provisions for this indicator, The SDVISta requires that a site visit is conducted during the validation process (Provision 1), it is, however, not mentioned if the site visit referred to in the stakeholder section of the validation template (Source 1) includes contact or engagement with local stakeholders (Provision 2). Further, the validation entity shall check the robustness of the stakeholder consultation process, but it is not prescribed how that should be done and if that includes a direct contact and engagement with local stakeholders. The indicator is therefore considered not be fulfilled by the combination of VCS with SDVISta.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.2, page 7: "Anti-Discrimination.

2.2.9 Appropriate measures shall be taken to ensure that the project proponent and all other entities involved in project design and implementation are not involved or complicit in any form of discrimination⁴ or sexual harassment with respect to the project.

Footnote 4: Discrimination may include but is not limited to that based on gender, race, religion, sexual orientation or other habits."

Provision 2 Source 2, section 3.16.1 "No Net Harm", page 39: The project proponent shall identify potential negative environmental and socio-economic impacts, and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or removals.

Note that VCUs may be labelled with additional standards and certifications on the Verra registry where both the VCS Program and another standard are applied. The Verra website provides the list of standards that are accepted as VCU labels and the procedure for attaining such VCU labels."

Provision 3 Source 2, section 3.16.14 "AFOLU projects", page 40: "The project proponent or any other entity involved in project design or implementation shall not be involved in any form of discrimination or sexual harassment."

Assessment outcome

No (0 Points).

Justification of assessment

The VCS provisions are not sufficient for this indicator (Provision 2 and 3). The complementary standard bans any form of discrimination, but does not explicitly ban any violation of human rights (Provision 1). Also in combination with the SDVISta the indicator is considered not to be fulfilled for VCS.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

There was no specific requirement of VCS or SDVISta found for projects to preserve and protect cultural heritage. The indicator is thus 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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.1, page 14: "Principle.

The project proponent demonstrates net positive well-being impacts for all stakeholders directly affected by their project's activities. [..]

3.1.4 The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including:

- 1) Changes in stakeholders' well-being due to project activities. This appraisal should include documentation of any activities intended to mitigate negative impacts to stakeholder groups."
- Provision 2 Source 1, section 3.1.5, page 15: "Net stakeholder well-being impacts of a project shall be positive for all stakeholder groups."
- Provision 3 Source 2, section 3.16.1 "No Net Harm", page 39: "The project proponent shall identify potential negative environmental and socio-economic impacts, and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or removals.

Note that VCUs may be labelled with additional standards and certifications on the Verra registry where both the VCS Program and another standard are applied. The Verra website provides the list of standards that are accepted as VCU labels and the procedure for attaining such VCU labels."

Assessment outcome

No (0 Points).

Justification of assessment

The SDVISta's overall goal is to create net-benefits for stakeholders and regarding environmental impacts. For social impacts, this includes the well-being of stakeholders (Provision 2). It is required to mitigate negative impacts on stakeholder groups and their well-being (Provision 1). There are no specific safeguards regarding health found in the standard provisions – for example a list of specific health or safety aspects to consider for the project owners.

The VCS requires that all potential negative environmental and socio-economic impacts must be identified and mitigated by project owners (Provision 1). However, it has no specific health related provisions. The program therefore does not provide a list of potential negative health related impacts that all projects must at a minimum assess and mitigate. It therefore relies completely on the project owner and validator to consider all relevant impacts that might be associated with a specific project or not. A predefined list of impacts is considered to provide more assurance that impacts will be considered as it serves as a guide to project owners and validators what impacts must at a minimum be assessed. As both the carbon crediting program and the complementary standard do not clearly define the type of health-related impacts that must be assessed the indicator is considered to not be 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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.4, page 10: "Respect for Rights to Lands, Territories and Resources and Free, Prior and Informed Consent.

2.4.2 All property rights shall be recognized, respected and supported. Projects shall not encroach uninvited on private property, community property (including lands, territories and resources to which communities have collective rights, either customary or statutory), or government property."

- Provision 2 Source 1, section 2.4, page 10: " 2.4.4 Appropriate restitution or compensation for financial and non-financial costs of the loss of land (e.g., loss of culture or loss of business opportunity) shall be allocated to any parties whose lands or access to resources have been or will be negatively affected by a project."
- Provision 3 Source 1, section 2.4, page 11: "2.4.5 Project activities shall not lead to involuntary removal or relocation of property rights holders from their lands or territories and shall not force property rights holders to relocate activities important to their culture or livelihood. Where any relocation of habitation or activities important to their culture or livelihood is undertaken within the terms of an agreement, the project proponent shall demonstrate in the project description (or monitoring report, where relevant) that the agreement was made with the free, prior and informed consent of those concerned and includes provisions for just and fair compensation.⁶

Footnote 6: In accordance with Article 28 of the UN Declaration on the Rights of Indigenous Peoples, unless otherwise agreed upon, compensation shall 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. This principle is consistent with Article 16 of the International Labour Organization's Indigenous and Tribal Peoples Convention, 1989 (No. 169): Convention concerning Indigenous and Tribal Peoples in Independent Countries (available at http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100 ILO CODE:C169)."

- Provision 4 Source 1, section 2.4, page 10: " 2.4.3 The free, prior and informed consent shall be obtained of those whose property rights are affected by a project through a transparent, agreed process. See Box 4 below for more information on free, prior and informed consent. [..]"
- Provision 5 Source 2, section 3.16.1 "No Net Harm", page 39: The project proponent shall identify potential negative environmental and socio-economic impacts, and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or removals.

Note that VCUs may be labelled with additional standards and certifications on the Verra registry where both the VCS Program and another standard are applied. The Verra website provides the list of standards that are accepted as VCU labels and the procedure for attaining such VCU labels."

Provision 6 Source 2, section 3.16.16 "AFOLU Projects", page 42: "The project proponent shall avoid negative impacts of project implementation and mitigate impacts when unavoidable, including the following:

1)The project proponent shall recognize, respect and support local stakeholders' property rights and where feasible, take measures to help secure rights. The project shall not encroach on private, stakeholder or government property or relocate people off their lands without consent [emphasis added]. The project may affect property rights if free, prior and informed consent is obtained from those concerned and a transparent agreement is reached that includes provisions for just and fair compensation. In the event there are any ongoing or unresolved conflicts over property rights, usage or resources, the project shall undertake no activity that could exacerbate the conflict or influence the outcome of an unresolved dispute."

Assessment outcome

No (0 Points).

Justification of assessment

The program requires project owners to respect property rights (Provision 1). In general, "involuntary removal or relocation of property rights holders" or the relocation of activities important to culture or livelihood shall not occur (Provision 3). If any loss of land or resources occurs, an "appropriate restitution or compensation for financial and non-financial costs" is required as well as free, prior and informed consent if property rights are affected at all (Provision 2 and 4). However, as the provisions are only about involuntary relocations, a requirement that displacement shall be avoided, and only allowed in exceptional circumstances, is missing. While Provision 6 of VCS states that projects "shall not encroach on private, stakeholder or government property or relocate people off their lands without consent" and just and fair compensation is foreseen if property are affected, the provisions do not explicitly exclude voluntary relocation or highlight that displacement shall only occur in exceptional circumstances. The VCS and SDVISta displacement provisions do not fully meet the requirements of the indicator.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

Provision 1 Source 1, section 3.2.4, page 15: "The project proponent shall estimate in the project description, and present data in each monitoring report, the type and magnitude of a project's impacts, including:

1) Changes in natural capital and ecosystem services due to project activities. This appraisal should include documentation of any activities intended to mitigate negative impacts on natural capital and ecosystem services.

2) Any SDG target(s) associated with the planet identified in Section 2.1.2 above and any natural capital and ecosystem services benefits that will be used as SD VISta claims or assets.

All estimates of project impact shall be based on clearly defined and defendable assumptions."

- Provision 2 Source 1, section 3.2.5, page 16: "Net impacts on natural capital and ecosystem services directly affected by the project shall be positive."
- Provision 3 Source 2, section 3.16 "Concept", page 39: "Project activities shall not negatively impact the natural environment or local communities. Project proponents shall identify and address any negative environmental and socio-economic impacts of project activities, and shall engage with local stakeholders during the project development and implementation processes. [..]"
- Provision 4 Source 2, section 3.16.1, page 39: "The project proponent shall identify potential negative environmental and socio-economic impacts, and shall take steps to mitigate them. Additional certification standards may be applied to demonstrate social and environmental benefits beyond GHG emission reductions or removals."
- Provision 5 Source 2, section 3.16.16 "AFOLU Projects", page 42: "[...] 2) b) The project shall justify the use of fertilizers, chemical pesticides, biological control agents and other inputs used by the project and their possible adverse effects."

Assessment outcome

No (0 Points).

Justification of assessment

The VCS does require project owners to identify and mitigate any potential negative impacts (Provision 3). The program, however, does not have specific safeguards in place that provide further details what this at a minimum must entail to meet specific safeguards. The program notes that it provides additional certification options for demonstration of environmental and social benefits (Provision 4). For AFOLU projects, additional requirements apply that mandate the project owner to justify the use of fertilizers, chemical pesticides, biological control agents and other inputs used by the project and their possible adverse effects (Provision 5).

Generally, the SDVISta requires projects to have a net positive impact on the environment (Provision 2). Environmental impacts shall be assessed and mitigated (Provision 1). However, from the phrasing "Changes in natural capital and ecosystem services" it is not clear if the aspects, required by this indicator, are included. The unclear and open definition of environmental impacts, and consequently safeguards, is also reflected in the assessment of indicator 6.1.2.

It is deemed that the provisions of the program and the complementary standard do not specify the environmental safeguards sufficiently to fulfil this indicator. The indicator is therefore not fulfilled.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>

Relevant carbon crediting program provisions

Provision 1 Source 1, section 2.4, page 10: "2.4.3 Box 4: Definition of Free, Prior and Informed Consent.

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

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

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

- The nature, size, pace, reversibility and scope of any proposed project or activity;
- The reason(s) or purpose of the project and/or activity;
- The duration of the above;
- The locality of areas that will be affected;
- A preliminary assessment of the likely economic, social, cultural and environmental impact, including potential risks and fair and equitable benefit sharing in a context that respects the precautionary principle;
- Personnel likely to be involved in the execution of the proposed project (including Indigenous Peoples, private sector staff, research institutions, government employees and others); and
- Procedures that the project may entail."
- Provision 2 Source 1, section 2.2, page 8: "Worker Relations.

2.1.10 Orientation and training shall be provided for a project's workers and individual stakeholders involved in carrying out project activities with an objective of building locally useful skills and knowledge to increase local participation in project implementation. These capacity-building efforts should target a wide range of people from among the stakeholders. Training shall be passed on to new workers when there

is staff turnover, so that local capacity will not be lost. Special attention shall be given to marginalized and/or vulnerable people."

Assessment outcome

No (0 Points).

Justification of assessment

The VCS has no relevant provisions. The complementary standard promotes capacity-building in the local population during worker trainings (Provision 2). While this might indirectly imply that local stakeholders might be employed by an SDVISta project, the provision is not explicit enough to count as a benefit sharing mechanism. Furthermore, the requirements for free, prior and informed consent foresee the assessment of "potential risks and fair and equitable benefit sharing" (Provision 1). However, there is no dedicated benefit-sharing mechanism required for projects. The indicator is therefore not fulfilled by the combination of VCS with SDVISta.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 VCS Standard, v4.1. Document issued on 22 April 2021. Online available at: <u>https://verra.org/wp-content/uploads/2021/04/VCS-Standard_v4.1.pdf</u>.

Relevant carbon crediting program provisions

- Provision 1 Source 1, section 3.16.16 "AFOLU Projects", page 42: "To reduce damage to the ecosystems on which the local stakeholders rely:
 - a) The project shall not introduce any invasive species or allow an invasive species to thrive through project implementation.
 - b) The project shall justify the use of non-native species over native species, explaining the possible adverse effects of non-native species."

Assessment outcome

AFOLU: Yes (1 Point).

Other: No (0 Points).

Justification of assessment

No such provision for the SDVISta could be found. VCS requires projects to "not introduce any invasive species or allow an invasive species to thrive through project implementation" (Provision 1) and thus acknowledges the adverse effects of invasive species. However, the program allows exceptions when the use of non-native species over native species is justified, and adverse effects are explained (as non-native species are likely to be also invasive non-native species). The indicator is therefore fulfilled for AFOLU projects only.

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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 SDVISta Program Guide. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/SD-VISta-Program-Guide-v1.0.pdf</u>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The were no such provisions for SDVISta or VCS found. The indicator is 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 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>
- 2 SDVISta Program Guide. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/SD-VISta-Program-Guide-v1.0.pdf</u>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The SDVISta and the VCS have no such specific guidance on safeguards.

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 SDVISta Program Guide. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/SD-VISta-Program-Guide-v1.0.pdf</u>
- 2 Verra Who We Are Important Policies. Online available at: https://verra.org/about/overview/#important-policies-

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The SDVISta has no dedicated gender policy. The VCS has no relevant provisions. The indicator is not fulfilled.

Relevant scoring methodology provisions

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

Information sources considered

1 Sustainable Development Verified Impact Standard. Version 1.0. Document issued on 22 January 2019. Online available at: <u>https://verra.org/wp-content/uploads/2019/01/Sustainable-Development-Verified-Impact-Standard-v1.0.pdf</u>

Relevant carbon crediting program provisions

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Assessment outcome

No (0 Points).

Justification of assessment

The VCS and the SDVISta have no such provision in place. The indicator is 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 26 and 24 for the combination of the carbon crediting program and complementary standard for AFOLU and non-AFOLU projects respectively. Applying the scoring approach in the methodology, this results in a score of 2.92 and 2.69 for this criterion respectively.

Annex: Summary of changes from previous assessment sheet versions

The following table describes the minor change implemented in comparison to the assessment from 08 November 2022.

Торіс	Rationale
Indicator 6.1.34	The justification has been elaborated further to provide more detail. No change to assessment result.