

PUBLIC COMMENT SUMMARY



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET



POST-CONSULTATION UPDATE

2 NOVEMBER 2022



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

1. Purpose
2. Spectrum of comments received
3. Stakeholder response
4. Comment breakdown
5. Comments flagged as key in Assessment Framework
6. Key issues
7. Comment feedback

PURPOSE

The purpose of the public comment triage initiative was to help identify the key issues relating to the CCPs and the Assessment Framework

Spectrum of comments received

- From this: *The entire framework needs to be reevaluated; to*
- This: *Any weakening of the criteria and requirements as they are currently set out in response to this consultation should be undertaken with caution so as not to risk undermining the objective of the CCPs.*

Stakeholder response

Number of comments by type of organisation

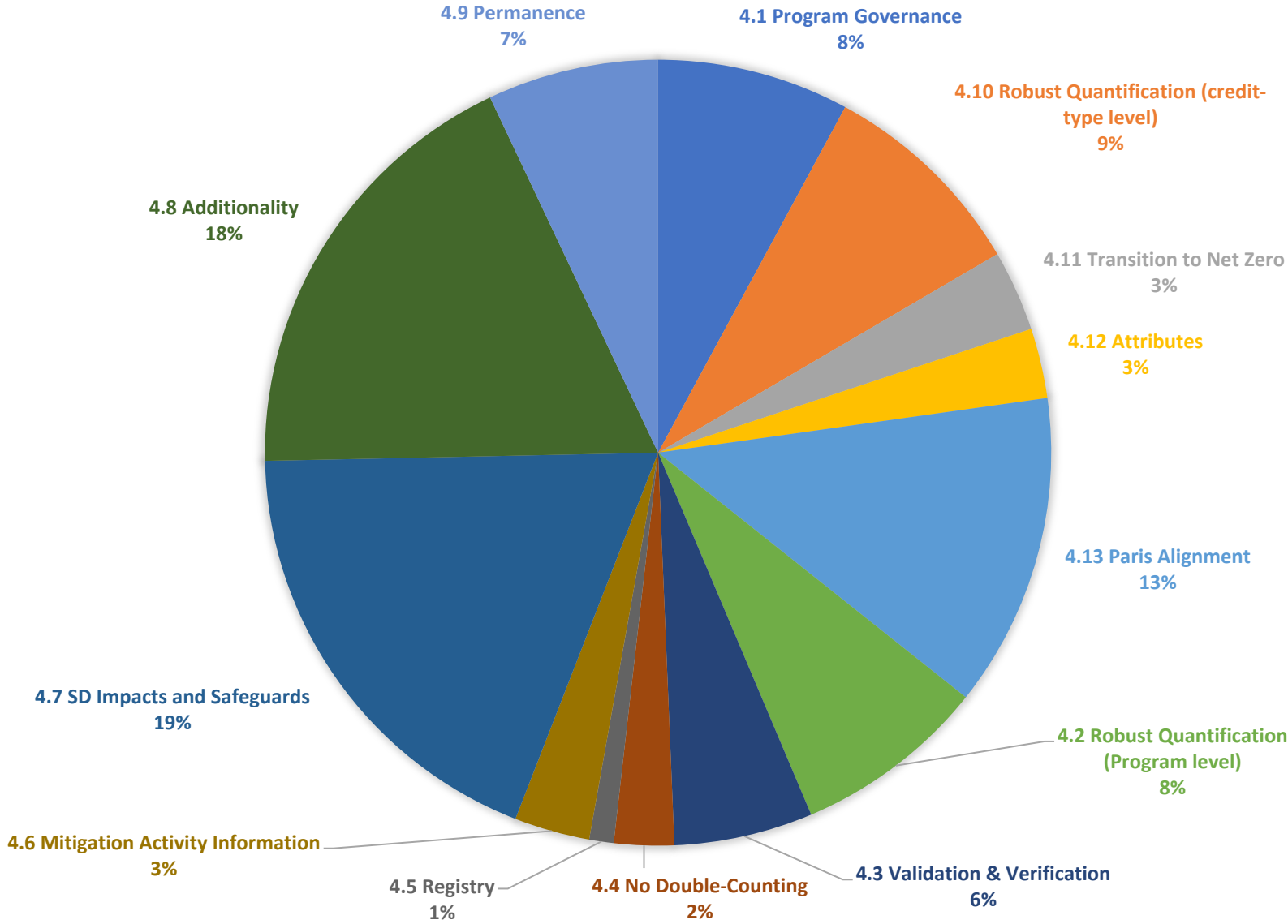


Comment breakdown

Table 1: Overall Comments by Section (Combined)

		Intro	CCPs	SDM	AF	T&Ds	AP
		Part 1	Part 2	Part 3	Part 4	Part 5	Part 6
Total							
Response anonymity	42	42	0	0	0	0	0
Introduction	532	0	0	0	532	0	0
Governance	605	0	0	8	597	0	0
CCPs	636	219	171	129	2	115	0
Attributes	151	0	20	28	103	0	0
Registry & Double-counting	143	0	0	9	134	0	0
Paris Alignment	623	0	7	240	376	0	0
Additionality	372	0	27	329	16	0	0
Permanence	667	0	30	214	423	0	0
Robust Quantification	908	0	29	12	867	0	0
Phasing & CORSIA	607	0	0	492	115	0	0
SD and Mitigation Activity Info	1637	636	173	404	424	0	0
Assessment Procedure	561	237	0	0	0	0	324
	7484	1134	457	1865	3589	115	324

COMMENTS FLAGGED AS A KEY ISSUE FOR AF TOTAL





KEY ISSUES

Additional cross-cutting issues (1-6) are being considered with key issues (7-13) flagged from the public consultation. These have been the focus of expert sub-panels and the Standards Oversight Committee to inform the Board and subsequent updates to the Assessment Framework.

Note: Comments herein represent a sample of views captured during the key issue triage process. Comment-by-comment resolution will follow in due course.

Cross-cutting Issues

1. Level of Assessment

2. Phasing

3. CORSIA alignment

4. Paris alignment

5. Robust quantification

6. Treatment of NCS

7. Additionality

8. Permanence

9. SD Impacts & SG

10. Governance

11. Transition to Net-Zero

12. Attributes

13. Core Carbon Principles

Key Issues

1. Level of Assessment



Project Developers

- ICAO assesses credit types broadly for CORSIA approval at a very high level and not on a granular level and could be instructive to the process proposed by ICVCM
- IC-VCM review should focus on the high-level requirements for methodology development, assessment and update rather than reassess every single methodology
- IC-VCM is not equipped with the expertise to review the detail of every methodology.
- This is an inappropriate role for IC-VCM to take



Carbon Programmes

- Difficult to have confidence that the “systematic assessment” of types of carbon credits (or types of mitigation activities) will not be unduly influenced by subjective ‘expert judgement’
- Assessment of methodologies should be on the adequacy of processes, and adherence to these processes, at the program level
- Recommendation to remove the Expert Panel systematic assessment of quantification approaches by methodology, based on it being highly subjective, questions the processes of the crediting bodies, and may introduce market uncertainty



Exchanges & Clearinghouse
Platforms

- ICVCM should not conduct its own assessment for every programme (credit) type but rather focus on standards and processes established at the program level.



Academia, Research
Organisations,
& Think Tanks

- On the initial threshold, there should be a requirement that baselines cannot be less conservative than that of the national NDC

2. Phasing



Corporate Buyers

- Cautioned that the initial threshold should be set at a level that does not exclude the majority of credit types (methodologies) from globally recognized standards bodies
- Create an initial threshold standard that can be seamlessly applied today to create confidence in the market
- Initial threshold should be immediately achievable by the most well-established programmes & followed by a mechanism to enhance the requirements over time backed by science and the experience



E&S NGOs

- No support for the introduction of initial and full stringency thresholds at this stage
- Need to understand how long each of these phase-in requirements will last, and whether each of these requirements has an arbitrary date for compliance or whether subsequent phases will trigger once certain criteria or milestones have been met in the market



Consultants & Advisors

- Requirements are appropriately balanced
- Most crediting programmes and projects would easily pass the Initial threshold
- To be CCP-eligible in the immediate term, carbon crediting programs and credit types should meet the initial threshold and commit to meet the more stringent requirements in a timely manner



Exchanges & Clearinghouse
Platforms

- Requirements of the initial threshold will already be challenging for carbon credit programmes to meet
- To require carbon credit programmes to make a commitment to take all necessary steps to comply with the full stringency threshold would overburden such programmes and discourage applicants
- There should be a clear transition pathway, encouraging the transition, similar to transition of CDM in Article 6.4



Rating Agencies

- Concern over pressure on ICVCM to set a single threshold, rather than a graduate pair of initial & full thresholds, which would lower the standards, further emphasizing feasibility of compliance over meaningful market improvements

3. CORSIA Alignment



E&S NGOs

- Support for alignment with CORSIA and other comparable bodies, to reduce transaction costs
- Recognition there may be some additional principles, criteria and requirements required of ICVCM over & above
- Concern that the ICVCM is missing the opportunity to help the evolution of the market by not creating own standard



Carbon Programmes

- Perspective that it is critical ICVCM owns the criteria and the verification at this critical time when so much transformation is happening in the voluntary carbon market
- CORSIA receives its share of critique and many credit buyers do not find that quality adequate or balanced



Consultants & Advisors

- If CORSIA was eligible as a means of demonstrating adherence to CCPs, it would greatly reduce the administrative burden for both programmes and the ICVCM
- ICVCM should take advantage of CORSIA's programme and emissions unit criteria, which are comprehensive, and yet are still clear and concise



Project Developers

- ICVCM should draw on assessments of CORSIA requirements in general
- The work carried out by other groups, such as ICAO's Technical Advisory Body and ICROA Standards Assessment Procedure, has been extensive, represents best practice in the market, & in many cases will be duplicative of the assessments that the ICVCM will undertake



Corporate Buyers

- Lessons can be learned from CORSIA, but there are gaps and weaknesses that should not be carried over. In particular, it has restricted some AFOLU project types that have potential to offer high-quality emissions and removals

4. Paris Alignment



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& Think Tanks



Financial Investors



Corporate Buyers



Consultants & Advisors



Project Developers



E&S NGOs



Strategic Initiatives

- Alignment with the Paris Agreement is a very important reason to safeguard what has become known as the 'Social Integrity' of the VCM as a whole in the form of the CCPs
- Corresponding adjustments should not be necessary for voluntary claims made by non-state actors to compensate for their residual emissions

- As Article 6 of the Paris Agreement and the associated requirements for international transfers of voluntary carbon credits are not yet clear or finalized, suggestions that ICVCM defer to future Article 6 developments as a guideline.

- The voluntary carbon markets should continue to operate in parallel to the frameworks that have been designed and established under the context of the Paris Agreement, and therefore this should not be an ICVCM requirement

- Alignment & CA is absolutely critical to the effective functioning of the market
- Not acceptable to make a compensation claim using emission reductions or removals that have already been counted and claimed by the host country

- Alignment of the voluntary carbon market with the Paris Agreement should not be a requirement
- Corresponding adjustments should be optional and no SOP or contributions to the OMGE should be required
- Would slow down the VCM and hamper financial flows host countries need to achieve their NDC targets

- Making CA mandatory for VCM would be detrimental for the market
- Voluntary use of carbon credits should require host country authorization to ensure association with CA
- Host country authorization with CA should be required immediately where carbon credits are used to meet compliance obligations (e.g., CORSIA, carbon tax obligations, etc.)

- Voluntary credits are private-sector initiative & voluntary offsetting goes beyond regulation
- Seeking alignment with the Paris Agreement would undermine the role and contribution of voluntary credits
- It is not necessary to have the same conditions as those of the Paris Agreement & should be left to project developers to seek alignment

5. Robust Quantification



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& Think Tanks

- ICVCM should provide a clear definition of what is meant by “conservative” and provide several best-practice examples on deriving a conservative quantification method for several scenarios of available data
- Quantification approach does not recognize the deductions already taken under jurisdictional REDD+



Exchanges & Clearinghouse
Platforms

- CCPs should aim at scientific accuracy, rather than conservatism. CCPs should require conservativeness only when scientific accuracy is not available



Corporate Buyers

- Full threshold for robust, quantitative information on the type, magnitude and value of co-benefits, using consistent measurement metrics, would facilitate more robust price discovery & promote more efficient capital allocation
- Consideration should be given to requiring the robust quantification of positive SD impacts under the full threshold or through a ratcheting up of the full threshold to require quantification over time



Project Developers

- Deductions according to calculation uncertainties should result adjustment in either direction according to uncertainties.
- Observed a large emphasis on expert judgement with concern on how registries would be expected to assess their performance against the AF with certainty
- Resistance to requiring crediting periods align with NDC reporting



E&S NGOs

- Favoring conservativeness over accuracy could lead to unintended consequences, such use of default IPCC values that may lead to ERR estimates that are too conservative to make projects financially feasible
- AF should require programs develop quantification procedures based on the best available scientific knowledge and understanding



Carbon Programmes

- Key principles for quantification are covered in AF draft, and more!
- ICVCM managed to co-create a regulative framework that captures the essential: governance, transparency and robust quantification of real impact
- Hope that the key principles are not watered down
- Define the length of crediting period & set the maximum limits in line with the PA A6.4 RMPs for initial threshold

6. Treatment of NCS



Project Developers

- Perspective that the AF disadvantages Natural Climate Solutions (NCS)
- IPLC feedback that NCS cannot be subject to a ratchet or ramp-up mechanism and should be part of the Initial Threshold



Strategic Initiatives

- Frustration that NCS has not featured prominently in given importance to reach net-zero emissions target
- AF places conditions that could not be met by most NCS projects, mainly with regard to additionality and permanence



Corporate Buyers

- With regard to additionality and permanence, AF would not be attainable for NCS projects due to data and capacity constraints for even the highest quality projects
- CCP eligible credits would in all likelihood, not include credits from natural carbon sinks. This is clear in contrast with recommendations coming from relevant international organizations, including the IPCC



Financial Investors

- Concern that NCS programs in particular, including several that may be considered benchmarks in the space, would not qualify under the IC's definitions



E&S NGOs

- The creation of a binary approach also creates negative messaging in the market to investors by suggesting that many NCS projects are of bad quality
- AF should incentivize and promote mitigation activities that explicitly benefit biodiversity and SDGs... devaluation of these benefits serves as a bias against NCS mitigation activities



Consultants & Advisors

- Natural climate solutions have a significant role to play globally in reaching Paris and net zero ambitions.
- AF has not adequately addressed pathways for NCS projects to become CPP eligible
- Many of the provisions in the Assessment Framework, would not be attainable for NCS projects

7. Additionality

- Remove step 1 & assess additionality at the program level & develop negative list for technologies not in line with 1.5°C (including industrial gases)
- Remove the use of positive lists from additionality as they are an outcome of barrier analysis, not an additionality test in themselves
- Market penetration rates: create more nuanced approach, 5% threshold only appropriate for positive lists
- Recognize performance-based additionality
- Do not rely purely on financial additionality and prior consideration of carbon revenues for REDD+ and JREDD

- Benchmark IRR varies widely enough that it could continue to call into question the additionality of projects in the future
- JREDD should always be automatically additional
- Reconsider financial additionality approach for projects that receive government support
- ICVCM is not relying on carbon crediting programs but “reassessing” additionality
- In terms of prior consideration, participation in REDD+ readiness should count

8. Permanence

- Proposals that the ICVCM avoid project-based assessment of permanence and only review the program-level procedures including sufficiency of buffer pools for AFOLU
- Push-back by some on the risk-based approach; instead, rely on programs to conduct and document their approach to risk of reversal
- Some stakeholders favor the risk based approach but wish to introduce further differentiation in terms of the requirements for lower-risk projects
- Observations that 100-year commitment to monitor as being impractical and unrealistic
- Introducing 100-year permanence requirements was thought to exclude REDD+ from meeting the IC-VCM requirements, and do more harm than good
- Resistance on the acceptability of tonne-year accounting

- Option 3 is favored by some – in particular programs - for its flexibility, but lots of questions about the exact nature of the option.
- Several stakeholders (e.g. rating agencies) highlight the need for comprehensive information on calculation of buffer pool requirements and their composition
- Push-back on requirements for liability for reversals beyond the crediting period, especially in relation to program-level liability
- Several strong comments on the applicability of this permanence framework on J-REDD, disputing ICVCM's statements that requirements would be similar, due to arguments on scale and approach differences to risk

9. Sustainable Development Impacts and Safeguards

- Safeguards for JREDD+ activities should build on the Cancun Safeguards
- IPLC considerations should be reflected throughout the Assessment Framework
- Suggestions to make SD Impact reporting a requirement but to label those with positive SDG impact & avoid a pass/fail assessment
- The safeguards proposed are excessive and an overreach of the ICVCM; create simplified list of topic-based criteria
- Clearly link safeguards to legal framework of the host country

- Do not differentiate safeguards for IPLCs but create flexible requirements based on consultative process
- Reviewers appear divided on whether to maintain net positive SDI as a requirement, reduce the threshold or make it an attribute.
- There seems to be support for IFC in terms of safeguards, but equally many voices cautioning against – both because it is too stringent or not stringent enough
- Multiple calls to create standalone CCPs on safeguards, on social provisions or on human rights rather than mixing them into one

10. Governance

- Recommendations that ICVCM provide programs with a set of template/sample documents in order to minimize burden
- ICVCM to keep up to date with the latest science and address problems with a minimum review frequency, e.g., every 5 years
- Recommendations for allowing all programs that have been approved by ICROA and CORSIA to automatically meet the program governance CCP
- Opinion was that in spite of relevant gaps in voluntary or regulated systems, most methodologies have been through a severe level of scrutiny, including independent verification processes

- Requiring carbon crediting programmes to engage stakeholders on public consultation on all updates will be onerous
- Carbon crediting programs are not keeping pace with the latest science and dynamic external market
- Most stakeholders support governance provisions (including corporates)
- More assurance needed on addressing any conflicts of interest for the credibility of the crediting program
- Governance provision is challenging, particularly for smaller registries and those in developing countries, and particularly during the initial phase

11. Transition to Net Zero

- Comments pointed to saying the guidance was too subjective
- Guidance should not be determined by Expert Panel, unless expanded and more balanced
- The provisions on the transition towards net zero emissions primarily include a negative screening of mitigation activities that have the potential to lock in emissions due to long term investments. There is a lack of clarity in terms of the mitigation activities that would constitute such lock-in effect. This provision also adds considerable uncertainty given that whether that technology provides a transition to net zero, depends on the region and the sector
- Concerns that the Expert Panel's judgment on compatibility with the net zero transition, lock-in, etc., may have perverse and unintended consequences
- Felt to be outside the purview of ICVCM to evaluate

- Others agreed that the transition towards net zero is a critical element for VCM integrity
- The ICVCM limiting the amount of carbon credits companies can purchase is a matter already addressed by SBTi and others
- Expectation ICVCM would take a stance on the need to transition from avoidance and reduction credits to removal credits by the mid-century
- Perspective that transition toward net-zero emissions is not in scope for the supply side of the market and opinion that project developers do not control who buys credits
- Welcome of ICVCM's proposal to consider and assess the consistency of technologies with a net-zero emission goal by mid-century
- No clear guidance have been presented to objectively determine appropriate technologies

12. Attributes

- Generally, there is support for attribute type of mitigation activity with divergence on how deeply the classification should go. Some want deeper categorizations, other want to keep it simple
- Labels must be material and make carbon credit navigation easier
- Should not duplicate information already available
- All attributes should demonstrate that they are in support of the transition to a net zero economy
- ICVCM should not establish attributes or co-develop and approve SDG+ labels; this is work for the programmes
- Host country authorization for purpose of Article 6 of the Paris Agreement should be optional

- CA tagging should be done but very divided on whether it should be an attribute or not
- SD Impacts should not be required for the Initial threshold but used as an attribute
- Many mention that SDGs would complicate the market with 16 additional labels & questioned buyer interest
- Some propose it is a good idea but for a later time when measurement methodologies and rules and guidelines have been established
- Adaptation does not contribute to the integrity of the credit

13. Core Carbon Principles

- Many agreed the CCPs were the right ones
- A number of commenters observed that the principle of “Do no harm” was missing
- CCPs and the AF cover the key principles, criteria, and requirements that are relevant to carbon market integrity
- Appreciation for the inclusion of CCPs that cover governance provisions, such as requirements for public availability of program documents, conflict of interest procedures, and grievance mechanisms
- CCPs are urgently needed, and will contribute to overall market trust and transparency
- Some buyers cautioned ICVCM that any weakening of the AF should be undertaken with caution so as not to risk undermining the objective of the CCPs

- CCPs should be supported by evidence demonstrating that these requirements have been tested and can be applied in a practical manner and analysed for their applicability, cost to implement, verifiability, and the potential impact on supply and climate action
- Many of the CCP's go beyond carbon and, in doing so, interject unnecessary uncertainty, increase cost, and intrude on key commercial information with related legal matters.
- CCPs remain too much within the existing model for certification, and therefore fail to truly raise the bar on quality
- CCPs remain focused on process as a sufficient stand-in for outcomes instead of moving to a system that values evidence of outcomes over description of process



SUMMARY - IP + LC SUBMITTED COMMENTS
25 NOV 2022



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

IP+LC COMMENT DISTRIBUTION

Category	# of comments
IPLC Organizations that commented	7
Total Comments	114
0. Foreword	6
1.0 Introduction	2
1.2 Introduction	1
2. CCPs	1
2.2.1C CCP Additionality	1
2.2.8 CCP Robust quantification of emission reduction and removals	9
3. Summary for Decision-Makers	1
3. A program Governance	1
3.F Sustainable Development	22
3.G Additionality	5
3.H Permanence	1
3.I Robust Quantification	2

IP+LC COMMENT DISTRIBUTION

Category	# of comments
2.L Paris Alignment	3
4.1 Program Governance	4
4.3 Validation & Verification	5
4.7 SD Impacts and Safeguards	41
5 Terms & Definitions	4
6 Assessment Procedure	1

IP+LC: COMMENTS ACROSS ISSUES

General

- Complexity of overall consultation process, reliance on the BSI form process, and the absence of timely translations of all available documents greatly diminishes the value and potential of this exercise. Despite one-off language-specific webinar the overall process appears to be designed for expert inputs only.
- Indigenous Peoples and local communities need to be either written in full throughout this text or in clearly separated form, if acronyms are preferred: e.g., "IPs and LCs" or "IP and LC".
- Define both Indigenous People and Local Communities

Sustainable Development & Safeguards:

- This is unsatisfactory. First of all, it appears to consider local communities not as market agents but as collateral. Secondly, it considers communities in the same 'box' as 'the environment' (biodiversity, pollution, ...), which could potentially lead to social impacts being offset against environmental ones.
- There is a lack of "proportionality principle" in this (and others) safeguards criterion. It would be unrealistic for smaller projects (mainly nature-based offsets in developing countries) to follow this criterion. Proportionality and flexibility for cultural adaptability is key and it is not currently reflected.
- IFC standards ensure consistency between countries, so it should be the base.
- Promote and actively support a rapid transition to jurisdictions credit approaches
- Cancun Safeguards should be implemented in line with the host country's national legal systems including the country's international human rights commitments and obligations.
- Spell out the fact that the aim of social safeguards is to respect and protect human rights as they are set out in international human rights instruments ratified and endorsed by the host countries (e.g. the Bill of Human Rights and other core UN conventions such as the Convention on the Elimination of All Forms of Racial Discrimination as well as the UN Declaration on the Rights of Indigenous Peoples). We suggest the following phrasing: "Adherence to international human rights instruments, environmental safeguards and sustainable development goals"
- The carbon-crediting program should have procedures requiring the protection of the rights of indigenous peoples in line with international human rights law, including their rights to customary lands, territories and resources
- The carbon-crediting program should have procedures requiring project developers to identify rights-holders possibly affected by proposed mitigation activities and the land they customarily own and use.
- Call on the IC-VCM to adopt a reasoned and science-based approach and methodology to carbon capture in rangelands.
- Advocate that avoidance of harm should be minimum standard and that emphasis should be on transformative potential of carbon crediting programs to significantly improve resources and rights available to IPLCs.
- Consider that if voluntary and agreed upon, access and use restrictions associated with forests and forest products may be appropriate. i.e. agreed upon restrictions of illegal/unsustainable timber harvesting, wildlife poaching and consumption.
- Advise that emphasis on determining and documenting genuine community leadership be referenced. Common complaint is contested representation from 'leaders' not accepted or agreed upon by the community.

IP+LC: COMMENTS ACROSS ISSUES

Paris Alignment

- The enforcement/conditionality of authorization would affect countries less advanced in the Application of Article 6. This would affect private parties and would create an even larger gap between countries.
- The voluntary carbon market should remain private, it is not a substitute for the regulated market.
- Many governments are proceeding slowly in the development of regulated markets due to the complexity of the mechanism. Since time is of the essence, practical approaches should be devised to add to the NDCs.
- Explore for a certain percentage of the carbon offsets traded by the voluntary market to be deducted and counted towards the NDC goals of the country where the sale takes place. This would trigger governments to enable the voluntary

Additionality

- Add to the criterion of not having occurred without the incentive, activities that, given present trends, are at high risk of not continuing in the absence of the incentive.
- While common to virtually all VCM frameworks, this principle presents considerable barriers to IPs and LCs who have successfully and sustainably maintained forests and other carbon-rich ecosystems -- in spite of the myriad pressures and challenges they face. It is unclear how all of the proposed assessment criteria might prove beneficial to the unique circumstances that communities.

Permanence

- Compensation mechanisms will favor technological offsets versus NBS.

CCPs

- As the principles currently stand, they lack consistency in their phrasing: some tells the reader what should be required (e.g. no double counting), whereas others are just a word/heading indicating what the topic is (e.g. registry). Consistency is recommended.
- It is highly recommended that "adherence to international human rights instruments" is adopted as an alone-standing principle due to the importance of carbon credits being produced in a way that does not violate the rights of indigenous peoples and other communities

IP+LC: COMMENTS ACROSS ISSUES

Validation & Verification

- In the pursuit of independence and impartiality it is important that the carbon standards have requirements ensuring that the funding for the VVBs is separate from the projects/jurisdictions being audited.
- Recommendation is to require the carbon crediting standards set up escrow funds to which the projects/jurisdictions seeking verification can contribute and can cover the work of the VVBs for that carbon standard in general.

Assessment Procedure

- The point that the IC will not only assess programs against principles and criteria, but also against implementation is very important and deserves fleshing out somewhere in the assessment framework.
- Recommend that it is made clear what information the IC will base its assessments on, especially when it comes to the implementation of carbon-crediting programs.
- Important that during the assessment, the IC is required to triangulate any self-assessment by the program through inter alia information generated by communities affected by mitigation activities. The IC must actively look for information in the public domain regarding any land tenure or other conflicts in the area of the mitigation activity and where relevant conduct interviews with affected with communities.

Program Governance

- Need for explicit differentiation and targeting of different stakeholder groups within communities in order for engagement to be meaningful and adverse impacts on most vulnerable to be avoided.
- We suggest that wherever a carbon crediting program is to be established in the land use sector and multiple actors are involved, FPIC is always relevant and necessary.
- Advise that there should be emphasis on iterative, 'rotating' FPIC – not on one off basis
- in addition to ensuring local communities are informed about the grievance mechanism, it needs to be accessible, widely communicated and made available in local languages.



**POST-CONSULTATION COMMENTS ON
SUSTAINABLE DEVELOPMENT IMPACTS &
SAFEGUARDS
14 DECEMBER 2022**



THE INTEGRITY COUNCIL
FOR THE VOLUNTARY CARBON MARKET

Sustainable Development Impacts & Safeguards



Net positive SDG impacts

- A group respondents suggested SDG impact assessment should be a central element of CCPs.
- Some respondents suggested the CCPs should be expanded to quantified SDG impact requirements.
- Some respondents suggested the requirement should be limited only to qualitative analysis until sufficient science and tools are available.
- Some comments recommended allowing the use of standardized tools for consistency.
- A group of respondents requested the use of national tools not be a requirement.
- Some commenters suggest SDG impacts should be reflected only as a voluntary attribute tag.



IC-VCM safeguards not suitable (or partially suitable) for REDD+

- IC-VCM should follow international consensus and adopt Cancun Safeguards for J-REDD.
- All REDD+ activities (not only J-REDD) should follow Cancun Safeguards.
- J-REDD safeguards, including Cancun, are of limited effectiveness to avoid harm to communities.
- Crediting programs would have to undergo significant changes to meet IC-VCM requirements (IC-VCM too stringent).



IFC Not Suitable for the Voluntary carbon market

- Some respondents argued that IFC safeguards were created primarily for large scale infrastructure investments and are not suitable for the VCM.
- Felt that IFC was overly cumbersome and their adoption will slow down market operations, especially for large scale projects. Some respondents were also concerned that the scope of IFC requirements go beyond the legal responsibilities of project proponents (eg labour rights).
- Some felt that IFC standards ensure consistency between countries, so it should be the base.
- Others questioning the suitability of an IFC framework are concerned that crediting programmes and VVBs are not geared up for application of this framework.
- Some of those respondents questioning the suitability of the IFC framework argue that alignment with national regulatory frameworks should be sufficient for the VCM.
- Conversely, a different and sizeable group believes that IFC framework lacks sufficient stringency, recommending alternative frameworks or additional provisions (eg from different UN efforts such as Global Compact, UN RBHR).

Sustainable Development Impacts & Safeguards



Benefit Sharing

- Some comments indicate that benefit sharing has colonial connotations reflecting an imbalance in power between ‘the top’ (usually the global North) and the ‘bottom’ (usually the beneficiary in the South). They suggest language should reflect a decolonized language advocating for IPLCs as equal partners of mitigation activities.
- Some commenters suggest replacing ‘benefit sharing’ with ‘revenue sharing’ and/or ‘beneficiary’ with ‘stakeholder or partner’
- Some commenters claim the entire criterion is a major overreach and infringement on the confidentiality of commercial terms.
- A group of comments highlight the importance of benefit sharing provisions and/or request further strengthening the CCP.



IP + LC considerations

- This is unsatisfactory. First of all, it appears to consider local communities not as market agents but as collateral. Secondly, it considers communities in the same ‘box’ as ‘the environment’ (biodiversity, pollution, ...), which could potentially lead to social impacts being offset against environmental ones.
- There is a lack of “proportionality principle” in this (and others) safeguards criterion. It would be unrealistic for smaller projects (mainly nature-based offsets in developing countries) to follow this criterion. Proportionality and flexibility for cultural adaptability is key and it is not currently reflected.
- Promote and actively support a rapid transition to jurisdictions credit approaches
- Cancun Safeguards should be implemented in line with the host country's national legal systems including the country's international human rights commitments and obligations.
- Spell out the fact that the aim of social safeguards is to respect and protect human rights as they are set out in international human rights instruments ratified and endorsed by the host countries (e.g. the Bill of Human Rights and other core UN conventions such as the Convention on the Elimination of All Forms of Racial Discrimination as well as the UN Declaration on the Rights of Indigenous Peoples). We suggest the following phrasing: "Adherence to international human rights instruments, environmental safeguards and sustainable development goals"
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- Safeguards for JREDD+ activities should build on the Cancun Safeguards
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- Multiple calls to create standalone CCPs on safeguards, on social provisions or on human rights rather than mixing them into one