



**CCQI**  
Carbon Credit  
Quality Initiative

## Application of the CCQI methodology for assessing the quality of carbon credits

This document presents results from the application of version 3.0 of a methodology, developed by Oeko-Institut, World Wildlife Fund (WWF-US) and Environmental Defense Fund (EDF), for assessing the quality of carbon credits. The methodology is applied by Oeko-Institut with support by Carbon Limits, Greenhouse Gas Management Institute (GHGMI), INFRAS, Stockholm Environment Institute, and individual carbon market experts. This document evaluates one specific criterion or sub-criterion with respect to a specific carbon crediting program, project type, quantification methodology and/or host country, as specified in the below table. Please note that the CCQI website [Site terms and Privacy Policy](#) apply with respect to any use of the information provided in this document. Further information on the project and the methodology can be found here: [www.carboncreditquality.org](http://www.carboncreditquality.org)

### Contact

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Criterion:	<b>6.1 Robustness of the carbon crediting program's environmental and social safeguards</b>
Carbon crediting program:	<b>CDM</b>
Project type:	<b>Establishment of natural forest Commercial afforestation</b>
Assessment based on carbon crediting program documents valid as of:	<b>15 May 2022</b>
Date of final assessment:	<b>21 February 2024</b>
Score:	<b>1.30</b>

# Assessment

## Indicator 6.1.1

### Relevant scoring methodology provisions

“The program requires the project owners to identify and mitigate potential negative environmental and social impacts, including to local and affected stakeholder wellbeing.”

### Information sources considered

- 1 Decision 5/CMP.1: Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol. ANNEX Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).
- 2 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 3 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph “Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism”, paragraph 12, page 64: “The DOE selected by project participants to validate a proposed afforestation or reforestation project activity under the CDM, being under a contractual arrangement with them, shall review the project design document and any supporting documentation to confirm that the following requirements have been met:

[...]

c) Project participants have submitted to the DOE documentation on the analysis of the socio-economic and environmental impacts, including impacts on biodiversity and natural ecosystems, and impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. If any negative impact is considered significant by the project participants or the host Party, project participants have undertaken a socio-economic impact assessment and/or an environmental impact assessment in accordance with the procedures required by the host Party. Project participants shall submit a statement that confirms that they have undertaken such an assessment in accordance with the procedures required by the host Party and include a description of the planned monitoring and remedial measures to address them”

- Provision 2 Source 1, appendix B, paragraph 2, page 77: “k) Socio-economic impacts of the project activity:
- (i) Documentation on the analysis of the socio-economic impacts, including impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. This analysis should include, where applicable, information on, inter alia, local communities, indigenous peoples, land tenure, local employment, food production, cultural and religious sites, and access to fuelwood and other forest products
  - (ii) If any negative impact is considered significant by the project participants or the host Party, a statement that project participants have undertaken a socioeconomic impact assessment, in accordance with the procedures required by the host Party, including conclusions and all references to support documentation”
- Provision 3 Source 2, paragraph 165, page 34: “The project participants shall carry out an analysis of the environmental impacts of the proposed A/R CDM project activity, including impacts on biodiversity and natural ecosystems and impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 4 Source 2, paragraph 166, page 34: “If the project participants or the host Party consider the environmental impacts of the proposed A/R CDM project activity significant, they shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party, and provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 5 Source 2, paragraph 167, page 34: “The project participants shall carry out an analysis of the major socio-economic impacts of the proposed A/R CDM project activity, including impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 6 Source 2, paragraph 168, page 34: “If, as a result of the analysis referred to paragraph 167 above, the project participants or the host Party consider any negative impact as significant, the project participants shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The project participants shall provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 7 Source 3, paragraph 44, page 13: “The analysis of the environmental impacts and, as applicable, the environmental impact assessment referred to in this section shall be carried out for the whole PoA or at the CPA level. The coordinating/managing entity shall describe the level applied.”
- Provision 8 Source 3, paragraph 45, page 13: “If the coordinating/managing entity has chosen to carry out the analysis of the environmental impacts for the whole PoA, it shall carry out the analysis, including transboundary impacts (or, in the case of a proposed A/R CDM PoA, impacts on biodiversity and natural ecosystems and impacts outside the

programme boundary), and provide a summary of the analysis and references to all related documentation.”

- Provision 9 Source 3 paragraph 46, page 13: “If, as a result of the analysis referred to in paragraph 45 above, the coordinating/ managing entity or the host Party(ies) consider the environmental impacts of the proposed CDM PoA significant, it shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party(ies), and provide all conclusions and references to al related documentation(and, in the case of a proposed A/R CDM PoA, the coordinating/managing entity shall also provide a description of the planned monitoring and remedial measures to address these significant impacts).”
- Provision 10 Source 3, paragraph 48, page 13: “For a proposed A/R CDM PoA, the coordinating/managing entity shall carry out an analysis of its major socio-economic impacts, including impacts outside the programme or project boundary, for the whole PoA or at the CPA level. The coordinating/managing entity shall describe the level applied.”
- Provision 11 Source 3, paragraph 49, page 13: “If the coordinating/managing entity has chosen to carry out the analysis for the whole PoA, it shall carry out the analysis and provide a summary of the analysis and references to all related documentation.”
- Provision 12 Source 3, paragraph 50, page 13: “If, as a result of the analysis referred to in paragraph 49 above, the coordinating/ managing entity or the host Party considers any negative impact as significant, the coordinating/managing entity shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The coordinating/managing entity shall provide all conclusions, references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”

### **Assessment outcome**

Yes (2 Points).

### **Justification of assessment**

The CDM project standard for project activities requires for afforestation and reforestation project activities to carry out an analysis of the environmental impacts and socio-economic impacts and if the impacts are considered to be significant, to carry out environmental and socio-economic impact assessments (Provision 3 to Provision 6). The same applies for A/R CDM PoAs (Provision 7 to Provision 12).

### **Indicator 6.1.2**

#### **Relevant scoring methodology provisions**

“The program clearly defines the types of environmental and social impacts that the project owners must identify and mitigate.”

### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 165, page 34: “The project participants shall carry out an analysis of the environmental impacts of the proposed A/R CDM project activity, including impacts on biodiversity and natural ecosystems and impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 2 Source 1, paragraph 167, page 34: “The project participants shall carry out an analysis of the major socio-economic impacts of the proposed A/R CDM project activity, including impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 3 Source 2, paragraph 45, page 13: “If the coordinating/managing entity has chosen to carry out the analysis of the environmental impacts for the whole PoA, it shall carry out the analysis, including transboundary impacts (or, in the case of a proposed A/R CDM PoA, impacts on biodiversity and natural ecosystems and impacts outside the programme boundary), and provide a summary of the analysis and references to all related documentation.”
- Provision 4 Source 2, paragraph 48, page 13: “For a proposed A/R CDM PoA, the coordinating/managing entity shall carry out an analysis of its major socio-economic impacts, including impacts outside the programme or project boundary, for the whole PoA or at the CPA level. The coordinating/managing entity shall describe the level applied.”

### Assessment outcome

No (0 Point).

### Justification of assessment

The carbon crediting program requires project owners carry out an analysis of the environmental impacts of the proposed A/R CDM project activity (Provision 1). It further specifies that this must include impacts on biodiversity and natural ecosystems and impacts outside the project boundary (Provision 1). Similarly, the program requires project owners to carry out an analysis of “the major” socio-economic impacts of the proposed activity (Provision 2). The same applies for Program of activities (Provisions 3 and 4). The program however does not clearly define the environmental and social impacts that must be assessed.

### 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 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

#### Relevant carbon crediting program provisions

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#### Assessment outcome

No (0 Points).

#### Justification of assessment

The CDM provisions do not include such requirements.

### 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 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

## Relevant carbon crediting program provisions

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## Assessment outcome

No (0 Points).

## Justification of assessment

The CDM has no provisions in place that require the assessment of institutional arrangements and capacities of the project owner to manage the environmental and social risks associated with the project.

## Indicator 6.1.5

### Relevant scoring methodology provisions

“The program requires the project owners to identify and adhere to any national or local legal requirements which may be relevant to the project.”

### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 166, page 34: “If the project participants or the host Party consider the environmental impacts of the proposed A/R CDM project activity significant, they shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party, and provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 2 Source 1, paragraph 168, page 34: “If, as a result of the analysis referred to paragraph 167 above, the project participants or the host Party consider any negative impact as significant, the project participants shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The project participants shall provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”

- Provision 3 Source 1 paragraph 138, page 30: “[...] The control of the project participants over afforestation or reforestation shall be considered as established if the project participants have the exclusive right to implement the proposed A/R CDM project activity, defined in a way that is acceptable under the legal system of the host Party.”
- Provision 4 Source 2, paragraph 46, page 13: “If, as a result of the analysis referred to in paragraph 45 above, the coordinating/ managing entity or the host Party(ies) consider the environmental impacts of the proposed CDM PoA significant, it shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party(ies), and provide all conclusions and references to all related documentation (and, in the case of a proposed A/R CDM PoA, the coordinating/managing entity shall also provide a description of the planned monitoring and remedial measures to address these significant impacts).”
- Provision 5 Source 2, paragraph 50, page 13: “If, as a result of the analysis referred to in paragraph 49 above, the coordinating/ managing entity or the host Party considers any negative impact as significant, the coordinating/managing entity shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The coordinating/managing entity shall provide all conclusions, references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”

### Assessment outcome

No (0 Points).

### Justification of assessment

The program provisions do not explicitly require the project owner to adhere to any legal requirements relevant to the projects. There is only reference to national law regarding ownership of forest land (Provision 3) and requirements for environmental or socio-economic assessment (if there are significant impacts) (Provision 4 and Provision 5).

### Indicator 6.1.6

#### Relevant scoring methodology provisions

“The program requires the disclosure of all relevant information from the project owner’s evaluation of environmental or social impacts and any Environmental Impact Assessments, if relevant or required to be carried out in the project’s local legal context.”

#### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 Decision 3/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. ANNEX Modalities and procedures for a clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).



- 3 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC\\_proc03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 166, page 34: “If the project participants or the host Party consider the environmental impacts of the proposed A/R CDM project activity significant, they shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party, and provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 2 Source 1, paragraph 168, page 34: “If, as a result of the analysis referred to paragraph 167 above, the project participants or the host Party consider any negative impact as significant, the project participants shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The project participants shall provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 3 Source 2, section “Modalities and procedures for a clean development mechanism”, paragraph 6, page 9: “Information obtained from CDM project participants marked as proprietary or confidential shall not be disclosed without the written consent of the provider of the information, except as required by national law. Information used to determine additionality as defined in paragraph 43 below, to describe the baseline methodology and its application, and to support an environmental impact assessment referred to in paragraph 37 (c) below, shall not be considered as proprietary or confidential.”
- Provision 4 Source 3, paragraph 19, page 9: “When submitting the PDD through the dedicated interface, the DOE shall provide the following information to be made publicly available on the UNFCCC CDM website:

[...]

(c) A summary of the environmental impact assessment report of the proposed CDM project activity, if the environmental impact assessment was conducted in accordance with the “CDM project standard for project activities”

### Assessment outcome

No (0 Points).

### Justification of assessment

Provision 1 and 2 require that “all conclusions and references” from the impact assessment need to be disclosed. A summary of the environmental impact assessment needs to be publicly available on the website (Provision 4). It is therefore not clear whether all relevant information of the impact assessment is disclosed as required by this indicator. The indicator is thus not sufficiently fulfilled.

## Indicator 6.1.7

### Relevant scoring methodology provisions

“The program requires, at least for any potential negative impacts, that a validation and verification entity validates the evaluation of social and environmental impacts by the project owner prior to registration.”

### Information sources considered

- 1 CDM validation and verification standard for project activities. CDM-EB93-A05-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg\\_stan06v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg_stan06v02.pdf).
- 2 CDM validation and verification standard for programmes of activities. CDM-EB93-A08-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg\\_Stan05v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg_Stan05v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 206, page 38: “The DOE shall validate the documentation received from the project participants on the analysis of environmental impacts of the proposed A/R CDM project activity, including impacts on biodiversity and natural ecosystems, and impacts outside the project boundary of the proposed A/R CDM project activity.”
- Provision 2 Source 1, paragraph 207, page 38: “The DOE shall confirm the above requirement by means of a document review and/or using local official sources and expertise
- Provision 3 Source 1, paragraph 208, page 38-39: “If the above-mentioned analysis leads to the conclusion that a negative impact that may be considered significant by the project participants or the host Party has been detected, then the DOE shall determine whether an environmental impact assessment has been undertaken in accordance with relevant host Party regulations, and the outcome of such impact assessment is summarized in the PDD.”
- Provision 4 Source 1, paragraph 209, page 39: “The DOE shall state whether the project participants have undertaken an analysis of environmental impacts and, if considered significant by the project participants or the host Party, a socio-economic impact assessment and/or an environmental impact assessment in accordance with relevant host Party regulations.”
- Provision 5 Source 1, paragraph 210, page 39: “The DOE shall also state whether the outcome of such impact assessment has been summarized in the PDD and whether a description of the planned monitoring and remedial measures to address the negative impacts has been included in the PDD.”
- Provision 6 Source 1, paragraph 211, page 39: “The DOE shall validate the documentation received from the project participants on the analysis of the major socio-economic

impacts of the proposed A/R CDM project activity, including impacts outside the project boundary of the proposed A/R CDM project activity.”

- Provision 7 Source 1, paragraph 212, page 39: “The DOE shall confirm the above requirement by means of a document review and/or using local official sources and expertise.”
- Provision 8 Source 1, paragraph 213, page 39: “If the above-mentioned analysis leads to the conclusion that a negative impact that may be considered significant by the project participants or the host Party has been detected, then the DOE shall determine whether a socio-economic impact assessment has been undertaken in accordance with relevant host Party regulations, and the outcome of such impact assessment is summarized in the PDD.”
- Provision 9 Source 1, paragraph 214, page 39: “The DOE shall state whether the project participants have undertaken an analysis of the socio-economic impacts and, if considered significant by the project participants or the host Party, a socio-economic impact assessment in accordance with relevant host Party regulations.”
- Provision 10 Source 1, paragraph 215, page 39: “The DOE shall also state whether the outcome of such impact assessment has been summarized in the PDD and whether a description of the planned monitoring and remedial measures to address the negative impacts has been included in the PDD.”
- Provision 11 Source 2, paragraph 230, page 43: “If the coordinating/managing entity chose to carry out analysis of environmental impacts of the A/R CDM PoA at the CPA level, the DOE shall validate the documentation received from the coordinating/managing entity on the analysis, including impacts on biodiversity and natural ecosystems and impacts outside the project boundary of the proposed A/R CPA.”
- Provision 12 Source 2, paragraph 231, page 43: “The DOE shall confirm the above requirement by means of a document review and/or using local official sources and expertise.”
- Provision 13 Source 2, paragraph 232, page 43: “If the above-mentioned analysis leads to the conclusion that a negative impact that may be considered significant by the coordinating/managing entity or the host Party has been detected, then the DOE shall determine whether an environmental impact assessment has been undertaken in accordance with relevant host Party regulations, and the outcome of such impact assessment is summarized in the CPA-DD.”
- Provision 14 Source 2, paragraph 233, page 43: “The DOE shall state whether the coordinating/managing entity has undertaken an analysis of the environmental impacts and, if considered significant by the coordinating/managing entity or the host Party, an environmental impact assessment in accordance with relevant host Party regulations.”
- Provision 15 Source 2, paragraph 234, page 43: “The DOE shall also state whether the outcome of such impact assessment has been summarized in the CPA-DD and whether a description of the planned monitoring and remedial measures to address the negative impacts has been included in the CPA-DD.”
- Provision 16 Source 2, paragraph 235, page 43: “If the coordinating/managing entity chose to carry out an analysis of the major socio-economic impacts of the A/R CDM PoA at the CPA level, the DOE shall validate the documentation received from the

coordinating/managing entity on the analysis, including impacts outside the project boundary of the proposed A/R CPA.”

- Provision 17 Source 2, paragraph 236, page 43: “The DOE shall confirm the above requirement by means of a document review and/or using local official sources and expertise.”
- Provision 18 Source 2, paragraph 237, page 43: “If the above-mentioned analysis leads to the conclusion that a negative impact that may be considered significant by the coordinating/managing entity or the host Party has been detected, then the DOE shall determine whether a socio-economic impact assessment has been undertaken in accordance with relevant host Party regulations, and the outcome of such impact assessment is summarized in the CPA-DD.”
- Provision 19 Source 2, paragraph 238, page 43: “The DOE shall state whether the coordinating/managing entity has undertaken an analysis of the socio-economic impacts and, if considered significant by the coordinating/managing entity or the host Party, a socio-economic impact assessment in accordance with relevant host Party regulations.”
- Provision 20 Source 2, paragraph 239, page 43: “The DOE shall also state whether the outcome of such impact assessment has been summarized in the CPA-DD and whether a description of the planned monitoring and remedial measures to address the negative impacts has been included in the CPA-DD.”

### **Assessment outcome**

No (0 Points)

### **Justification of assessment**

Source 1 and 2 prescribe how the social and environmental impact assessment are validated under the CDM for project activities and programmes of activities respectively. The program provisions 2 and 3 only prescribe that an independent auditor should determine whether any impacts have been assessed in accordance with applicable national law but not how these impacts were assessed. From the phrasing “The DOE shall validate the documentation received from the project participants on the analysis of environmental impacts” (e.g. Provision 1) it is however not clear if also the content of the impact analysis is fully validated or only the formal submission of the documents. The indicator is therefore not fulfilled.

### **Indicator 6.1.8**

#### **Relevant scoring methodology provisions**

“The program requires a follow-up on any potential negative impacts identified in the evaluation of social and environmental impacts prior to registration, e.g., by including measures to mitigate any negative impacts in monitoring plans.”

## Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).
- 3 Decision 5/CMP.1: Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol. ANNEX Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).

## Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 165, page 34: “The project participants shall carry out an analysis of the environmental impacts of the proposed A/R CDM project activity, including impacts on biodiversity and natural ecosystems and impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 2 Source 1, paragraph 166, page 34: “If the project participants or the host Party consider the environmental impacts of the proposed A/R CDM project activity significant, they shall carry out an environmental impact assessment in accordance with the relevant procedures of the host Party, and provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 3 Source 1, paragraph 167, page 34: “The project participants shall carry out an analysis of the major socio-economic impacts of the proposed A/R CDM project activity, including impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 4 Source 1, paragraph 168, page 34: “If, as a result of the analysis referred to paragraph 167 above, the project participants or the host Party consider any negative impact as significant, the project participants shall carry out a socio-economic impact assessment in accordance with the relevant procedures of the host Party. The project participants shall provide all conclusions and references to all related documentation and a description of the planned monitoring and remedial measures to address these significant impacts.”
- Provision 5 Source 2, paragraph 44, page 13: “The analysis of the environmental impacts and, as applicable, the environmental impact assessment referred to in this section shall be carried out for the whole PoA or at the CPA level. The coordinating/managing entity shall describe the level applied.”
- Provision 6 Source 3, paragraph 53, page 17: “Project participants shall include, as part of the project design document, a monitoring plan that provides for:

[...]

(d) The collection and archiving of information relating to the planned monitoring and remedial measures referred to in paragraph 37 (c) above;”

Provision 7 Source 3, paragraph 34, page 69: “In accordance with the provisions on confidentiality in paragraph 27 (h) of the annex to decision 17/CP.7, the DOE contracted by the project participants to perform the verification shall make the monitoring report publicly available, and shall:

[...]

(d) Determine whether the socio-economic and environmental impacts were monitored in accordance with the monitoring plan;”

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM requires for both project activities and programmes of activities (Provision 1 to Provision 5) a follow-up on negative impacts, including monitoring plans which include impacts and remedial measures (Provision 6 and Provision 7). However, this follow-up in form of a planned monitoring and remedial measures is only required for negative impacts that are deemed significant – and not for any/all negative impacts (e.g. Provision 2). The indicator is therefore considered to be not sufficiently fulfilled.

### Indicator 6.1.9

#### Relevant scoring methodology provisions

“The program requires, at least for any potential negative impacts, that social and economic impacts be monitored throughout the crediting periods of the project.”

#### Information sources considered

- 1 Decision 5/CMP.1: Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol. ANNEX Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).

#### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 14, page 83-84: “The DOE selected by project participants to validate a proposed afforestation or reforestation project activity under the CDM, being under a contractual arrangement with them, shall review the project design document and any supporting documentation to confirm that the following requirements have been met:

[...]

Project participants have submitted to the DOE documentation on the analysis of the socio-economic and environmental impacts, including impacts on biodiversity and natural ecosystems, and impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. If any negative impact is considered significant by the project participants or the host Party, project participants have undertaken a socio-economic impact assessment and/or an environmental impact assessment in accordance with the procedures required by the host Party. Project participants shall submit a statement that confirms that they have undertaken such an assessment in accordance with the procedures required by the host Party and include a description of the planned monitoring and remedial measures to address them”

Provision 2 Source 1, paragraph 53, page 17:

“Project participants shall include, as part of the project design document, a monitoring plan that provides for:

[...]

(d) The collection and archiving of information relating to the planned monitoring and remedial measures referred to in paragraph 37 (c) above;”

Provision 3 Source 1, paragraph 62, page 18: “In accordance with the provisions on confidentiality in paragraph 27 (h) of the annex to decision 17/CP.7, the DOE contracted by the project participants to perform the verification shall make the monitoring report publicly available, and shall:

[...]

(d) Determine whether the socio-economic and environmental impacts were monitored in accordance with the monitoring plan;”

Provision 4 Source 1, paragraph 25, page 67: “Project participants shall include, as part of the project design document, a monitoring plan that provides for:

(a) The collection and archiving of all relevant data necessary for estimating or measuring the actual net greenhouse gas removals by sinks during the crediting period.”

### Assessment outcome

No (0 Points).

### Justification of assessment

While the program provision require project owners to develop a monitoring plan and validation and verification bodies to check these (Provision 1 to Provision 4), not all negative impacts but only “significant” impacts are further pursued in the relevant program provision (Provision 1 for example). The indicator is therefore like Indicator 6.1.8 not fulfilled.

## Indicator 6.1.10

### Relevant scoring methodology provisions

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

### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM has no such provision in place.

## Indicator 6.1.11

### Relevant scoring methodology provisions

“The program has a grievance mechanism in place that allows local stakeholders to submit grievances throughout the lifetime of the project without any barriers (e.g. liability for expenses associated with the investigation). Such grievances must be duly considered by the carbon crediting program.”

### Information sources considered

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).



### **Justification of assessment**

The CDM has no such provision in place.

### **Indicator 6.1.12**

#### **Relevant scoring methodology provisions**

“The program requires that project owners have a culturally appropriate grievance mechanism in place for local stakeholders to submit grievances to them throughout the lifetime of the project. Such grievances must be duly considered by the project owner.”

#### **Information sources considered**

-

#### **Relevant carbon crediting program provisions**

-

#### **Assessment outcome**

No (0 Points).

### **Justification of assessment**

The CDM does not require project owners to have a grievance mechanism in place.

### **Indicator 6.1.13**

#### **Relevant scoring methodology provisions**

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

#### **Information sources considered**

-

#### **Relevant carbon crediting program provisions**

-

#### **Assessment outcome**

No (0 Points)

### **Justification of assessment**

The CDM has no such provision in place.

## 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

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM has no grievance mechanism in place.

## Indicator 6.1.15

### Relevant scoring methodology provisions

“The program requires the project owners to conduct an assessment of which local stakeholders will be impacted by the project.”

### Information sources considered

- 1 Decision 5/CMP.1: Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism in the first commitment period of the Kyoto Protocol. ANNEX Modalities and procedures for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbrev.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbrev.pdf).
- 2 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 3 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

Provision 1 Source 1, appendix A, page 89: “I) Socio-economic impacts of the project activity:

- (i) Documentation on the analysis of the socio-economic impacts, including impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. This analysis should include, where applicable, information on, inter alia, local communities, indigenous peoples, land tenure, local employment, food production, cultural and religious sites, and access to fuelwood and other forest products
- (ii) If any negative impact is considered significant by the project participants or the host Party, a statement that project participants have undertaken a socioeconomic impact assessment, in accordance with the procedures required by the host Party, including conclusions and all references to support documentation”

- Provision 2 Source 2, paragraph 94, page 22: “The project participants shall invite local stakeholders to provide comments on the proposed CDM project activity and shall demonstrate how due steps/actions were taken to appropriately engage stakeholders and solicit comments in accordance with this section.”
- Provision 3 Source 2, paragraph 97, page 23: “For the purpose of the local stakeholder consultation, the project participants shall invite, as a minimum, representatives of local stakeholders directly impacted by the proposed CDM project activity and representatives of local authorities relevant to the project activity.”
- Provision 4 Source 3, paragraph 51, page 14: “The coordinating/managing entity shall invite local stakeholders to provide comments on the proposed CDM PoA and shall demonstrate how due steps/actions were taken to appropriately engage stakeholders and solicit comments in accordance with this section. A local stakeholder consultation shall be carried out for the whole PoA or at the CPA level. The coordinating/managing entity shall specify the level of consultation applied.”
- Provision 5 Source 3, paragraph 54, page14: “For the purpose of the local stakeholder consultation, the coordinating/managing entity shall invite, as a minimum, representatives of local stakeholders directly impacted by the proposed CDM PoA and representatives of local authorities relevant to the PoA.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

For afforestation and reforestation projects under the CDM, the analysis of socio-economic impacts includes information on local stakeholder (Provision 1). Additionally, the general program provisions prescribe the consultation of directly impact stakeholders (Provision 2 to Provision 5). The indicator is therefore fulfilled.

## Indicator 6.1.16

### Relevant scoring methodology provisions

“In assessing which local stakeholders will be impacted by the project, the program explicitly requires, at least for projects affecting land use, that the project owners identify local stakeholders that hold any legal or customary tenure or access rights to the land.”

### Information sources considered

- 1 Decision 5/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. APPENDIX B Project design document for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).
- 2 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 3 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

### Relevant carbon crediting program provisions

Provision 1 Source 1, appendix B, paragraph 2, page 76-77: “[...] A project activity shall be described in detail in a project design document, taking into account the provisions for afforestation and reforestation project activities under the CDM as set out in the present annex, in particular, section G on validation and registration and section H on monitoring. The description shall include the following:

[...]

(c) A description of legal title to the land, rights of access to the sequestered carbon, current land tenure and land use

[...]

(k) Socio-economic impacts of the project activity:

(i) Documentation on the analysis of the socio-economic impacts, including impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. This analysis should include, where applicable, information on, inter alia, local communities, indigenous peoples, land tenure, local employment, food production, cultural and religious sites, and access to fuelwood and other forest products

(ii) If any negative impact is considered significant by the project participants or the host Party, a statement that project participants have undertaken a socio-economic impact assessment, in accordance with the procedures

required by the host Party, including conclusions and all references to support documentation”

Provision 2 Source 2, paragraph 136, page 30: “When describing a proposed A/R CDM project activity, the project participants shall:

[...]

e) Describe or list the legal title(s) to the land, current land tenure and rights enabling determination of the owner of the temporary CERs (tCERs) or long-term CERs (ICERs) to be issued for the project activity.”

Provision 3 Source 3, paragraph 198, page 43: “When describing a proposed A/R CPA, the coordinating/managing entity shall:

[...]

e) Describe or list the legal title(s) to the land, current land tenure and rights enabling determination of the owner of the tCERs or ICERs to be issued for the A/R CPA.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The above documentation specifies that the indicator is fulfilled.

### Indicator 6.1.17

#### Relevant scoring methodology provisions

“The program requires the project owners to conduct a local stakeholder consultation in a way that is inclusive and culturally appropriate for local communities (taking into account, e.g., literacy, culture and language).”

#### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

#### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 99, page 23: “The project participants shall invite local stakeholders to provide comments on the proposed CDM project activity in an open

and transparent manner, in a way that facilitates comments to be received from local stakeholders and allows for a reasonable time for comments to be submitted. The project participants shall describe the steps/actions taken to invite comments, taking into account local and national circumstances.”

- Provision 2 Source 1, paragraph 100, page 23: “The project participants shall convey information to stakeholders about the local stakeholder consultation and the proposed CDM project activity. This should include information disseminated in ways that are appropriate for the community that is directly affected by the project activity. In areas where a significant part of the population is illiterate, the information shall be provided orally.”
- Provision 3 Source 1, paragraph 102, page 24: “The project participants shall conduct the local stakeholder consultation through means that are appropriate for the local and national circumstances.”
- Provision 4 Source 2, paragraph 59, page 15: “The coordinating/managing entity shall conduct the local stakeholder consultation through means that are appropriate for the local and national circumstances.”
- Provision 5 Source 2, paragraph 60, page 15: “The coordinating/managing entity shall provide local stakeholders with the opportunity to comment in writing or via other means and gather their comments about the proposed CDM PoA and its direct impacts.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

While the program provision not explicitly refer to “culturally appropriate” local stakeholder consultations, the requirements do take literacy and local/national circumstances into account.

## Indicator 6.1.18

### Relevant scoring methodology provisions

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

### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

- 3 CDM Glossary of Terms, CDM-EB07-A04-GLOS Version 10.0. Online available at: [https://cdm.unfccc.int/Reference/Guidclarif/glos\\_CDM.pdf](https://cdm.unfccc.int/Reference/Guidclarif/glos_CDM.pdf)

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 107, page 24: “The project participants shall complete the local stakeholder consultation process at the timing required by the rules of the host Party on local stakeholder consultation, if such rules exist. If host Party rules do not exist, the project participants shall complete the process before, whichever the earlier of:
- (a) The start date of the project activity as defined in the “Glossary: CDM terms”; or
  - (b) The date of submitting the PDD of the proposed CDM project activity to a DOE for validation.”
- Provision 2 Source 2, paragraph 64, page 15: “The coordinating/managing entity shall complete the local stakeholder consultation process at the timing required by the rules of the host Party on local stakeholder consultation, if such rules exist. If host Party rules do not exist, the coordinating/managing entity shall complete the process before, whichever the earlier of:
- (a) The earliest of the start dates of the CPAs as defined in the “Glossary: CDM terms”; that will be included in the PoA; or
  - (b) The date of submitting the PoA-DD of the proposed CDM PoA to a DOE for validation.”
- Provision 3 Source 3, paragraph “Definition for the term Start Date”, page 20: “For an A/R CDM project activity or A/R CPA, the date on which the site preparation begins.”

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM provisions require the timing of local stakeholder consultations to be in accordance with the rules of the host Party. If no host Party rules exist, the CDM prescribes that the consultation should be conducted prior to the start date of the project or the date of submitting the PDD to the DOE for validation (Provision 1 and Provision 2). The start date of the project is defined as the date on which the site preparation begins (Provision 3). As it foremost depends on the rules of the host Party, the indicator is considered to be not sufficiently fulfilled.

### Indicator 6.1.19

#### Relevant scoring methodology provisions

“The program requires the project owners to take due account of any input received in the local stakeholder consultation and to publicly document how inputs received are addressed.”

## Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).
- 3 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC\\_proc03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf).
- 4 CDM project cycle procedure for programmes of activities. CDM-EB93-A09-PROC. Version 02.0. Document issued on 29 November 2018. Online available at:  
[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC\\_proc02v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC_proc02v02.pdf).

## Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 96, page 23: “The project participants shall conduct the local stakeholder consultation in accordance with applicable host Party rules, if any. Where host Party rules on local stakeholder consultation are applicable, the project participants shall provide, in the PDD, a summary of the consultations carried out under the host Party rules, including the direct positive and negative impacts identified and how the negative impacts identified will be addressed.”
- Provision 2 Source 1, paragraph 106, page 24: “The project participants shall consider the comments provided by local stakeholders and report on how they have taken them into account in the PDD or in the revised PDD. The project participants shall provide justification if any comments were not incorporated.”
- Provision 3 Source 2, paragraph 53, page 14 “The coordinating/managing entity shall conduct the local stakeholder consultation in accordance with applicable host Party rules, if any. Where host Party rules on local stakeholder consultation are applicable, the coordinating/managing entity shall provide, in the PoA-DD, a summary of the consultations carried out under the host Party rules, including the direct positive and negative impacts identified and how the negative impacts identified will be addressed.”
- Provision 4 Source 2, paragraph 63, page 15: “The coordinating/managing entity shall consider the comments provided by local stakeholders and report on how they have taken them into account in the PoA-DD or in the revised PoA-DD. The coordinating/managing entity shall provide justification if any comments were not incorporated.”
- Provision 5 Source 3, paragraph 19, page 9: “When submitting the PDD through the dedicated interface, the DOE shall provide the following information to be made publicly available on the UNFCCC CDM website:



- (a) Reference to any previous publication of the PDD for public comments on the UNFCCC CDM website;
- (b) The summary report of the comments received from local stakeholders during the local stakeholder consultation and how they have been taken into account;
- (c) A summary of the environmental impact assessment report of the proposed CDM project activity, if the environmental impact assessment was conducted in accordance with the “CDM project standard for project activities”.

Provision 6 Source 4, paragraph 11, page 8: “When submitting the PoA-DD through the dedicated interface, the DOE shall provide the following information, to be made publicly available on the UNFCCC CDM website:

- (a) Reference to any previous publication of the PoA-DD for public comments on the UNFCCC CDM website;
- (b) The summary report of the comments received from local stakeholders during the local stakeholder consultation and how they have been taken into account, if local stakeholder consultation was conducted at the PoA level;
- (c) A summary of the environmental impact assessment report of the proposed CDM PoA, if the environmental impact assessment was conducted for the PoA in accordance with the “CDM project standard for programmes of activities” [...]”

### Assessment outcome

Yes (1 Point)

### Justification of assessment

Stakeholder inputs are collected, and it is documented if and how they were considered (Provision 1 to Provision 4). The program also requires the public documentation of inputs received and how they are addressed (Provision 5 and Provision 6). The indicator is therefore fulfilled.

### Indicator 6.1.20

#### Relevant scoring methodology provisions

“The program requires that a validation and verification entity assesses whether the project owners have taken due account of all inputs received in the local stakeholder consultation.”

#### Information sources considered

- 1 CDM validation and verification standard for project activities. CDM-EB93-A05-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg\\_stan06v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg_stan06v02.pdf).

- 2 CDM validation and verification standard for programmes of activities. CDM-EB93-A08-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg\\_Stan05v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg_Stan05v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 130, page 28: “The DOE shall determine whether the project participants have completed the local stakeholder consultation in accordance with the relevant requirements in the “CDM project standard for project activities”
- Provision 2 Source 1, paragraph 131, page 29: “The DOE shall determine whether there are applicable host Party rules on local stakeholder consultation. Where such rules exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA, as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the rules.”
- Provision 3 Source 1, paragraph 132, page 29: “If applicable host Party rules on local stakeholder consultation do not exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the requirements in the “CDM project standard for project activities” pertaining to:
- (a) Scope of local stakeholder consultation;
  - (b) Minimum group of stakeholders to be involved;
  - (c) Means for inviting stakeholders’ participation;
  - (d) Information to be made available to stakeholders;
  - (e) Conduct of consultation;
  - (f) Summary of comments received;
  - (g) Consideration of comments received;
  - (h) Timing of local stakeholder consultation”
- Provision 4 Source 2, paragraph 59, page 16: “The DOE shall determine whether the consultation was carried out in accordance with the relevant requirements in the “CDM project standard for programmes of activities”.
- Provision 5 Source 2, paragraph 60, page 16: “The DOE shall determine whether there are applicable host Party rules on local stakeholder consultation. Where such rules exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA, as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the rules.”
- Provision 6 Source 2, paragraph 61, page 16: “If applicable host Party rules on local stakeholder consultation do not exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the requirements in the “CDM project standard for programmes of activities” related to:

- (a) Scope of local stakeholder consultation;
- (b) Minimum group of stakeholders to be involved;
- (c) Means for inviting stakeholders' participation;
- (d) Information to be made available to stakeholders;
- (e) Conduct of consultation;
- (f) Summary of comments received;
- (g) Consideration of comments received;
- (h) Timing of local stakeholder consultation.”

### Assessment outcome

No (0 Points).

### Justification of assessment

The validation and verification of local stakeholder consultation depends on host Party rules in the CDM program provisions (Provision 2 and Provision 5). If no host Party rules exist, the validation and verification body is required to assess whether entity assesses whether the project owners have taken due account of all inputs received in the local stakeholder consultation amongst other things (Provision 3 and Provision 6). As the provision depends on the host Party rules, the indicator is considered to be not sufficiently fulfilled.

### Indicator 6.1.21

#### Relevant scoring methodology provisions

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

#### Information sources considered

- 1 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).

#### Relevant carbon crediting program provisions

Provision 1 Source 1, paragraph 101, page 23: “The project participants shall describe the proposed CDM project activity in a manner that allows local stakeholders to

understand the project activity. The information to be made available to stakeholders shall include, inter alia:

- (a) A summary of the proposed CDM project activity, explaining the project activity in simple, non-technical terms, and containing a description of the direct positive and negative impacts;
- (b) Information on the projected scope, lifetime, and direct positive and negative impacts of the proposed CDM project activity;
- (c) Other relevant information about the proposed CDM project activity, taking into account confidentiality provisions of the applicable CDM M&Ps referred to in paragraph 1 above;
- (d) The means to provide comments about the proposed CDM project activity.”

Provision 2 Source 2, paragraph 58, page 15: “The coordinating/managing entity shall describe the proposed CDM PoA in manner that allows local stakeholders to understand the PoA. The information to be made available to stakeholders shall include, inter alia:

- (a) A summary of the proposed CDM PoA, explaining the PoA in simple, non-technical terms, and containing a description of the direct positive and negative impacts;
- (b) Information on the projected scope, lifetime, and direct positive and negative impacts of the proposed CDM PoA;
- (c) Other relevant information about the proposed CDM PoA, taking into account confidentiality provisions of the applicable CDM M&Ps referred to in paragraph 1 above;
- (d) The means to provide comments about the proposed CDM PoA.”

### Assessment outcome

Yes (1 Point)

### Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

### Indicator 6.1.22

#### Relevant scoring methodology provisions

“The program requires free, prior and informed consent if indigenous, tribal or traditional people are directly affected by a project (e.g., in case of re-locations or where property rights or land inhabited or used by people is affected).

#### Information sources considered

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**Relevant carbon crediting program provisions**

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**Assessment outcome**

No (0 Points).

**Justification of assessment**

The CDM has no such provision in place.

**Indicator 6.1.23**

**Relevant scoring methodology provisions**

“The program requires the project owners to establish mechanisms for ongoing communication with local stakeholders (e.g., periodic consultations) in a manner appropriate to the context of the stakeholders (e.g., literacy, culture and language) and take due account of input received.”

**Information sources considered**

-

**Relevant carbon crediting program provisions**

-

**Assessment outcome**

No (0 Points).

**Justification of assessment**

The CDM has no such provision in place.

**Indicator 6.1.24**

**Relevant scoring methodology provisions**

“The program requires that a record of how issues from local stakeholder consultations (6.1.18), grievances communicated to project owners (6.1.12) and ongoing communication (6.1.23) have been addressed is made publicly available or made available upon request .”

**Information sources considered**

-

## Relevant carbon crediting program provisions

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## Assessment outcome

No (0 Points).

## Justification of assessment

The CDM has no provisions regarding ongoing communication and grievances nor does the program require the publication of how issues raised from these channels have been addressed.

## 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 CDM validation and verification standard for project activities. CDM-EB93-A05-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg\\_stan06v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg_stan06v02.pdf).
- 2 CDM validation and verification standard for programmes of activities. CDM-EB93-A08-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg\\_Stan05v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg_Stan05v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 131, page 29: “The DOE shall determine whether there are applicable host Party rules on local stakeholder consultation. Where such rules exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA, as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the rules.”
- Provision 2 Source 1, paragraph 132, page 29: “If applicable host Party rules on local stakeholder consultation do not exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the requirements in the “CD project standard for project activities” related to: [...]”
- Provision 3 Source 1, paragraph 136, page 29: “If significant changes to the PoA design occurs after the local stakeholder consultation, the DOE shall determine whether a new local stakeholder consultation was conducted with relevant stakeholders in accordance with paragraphs 130 and 131 above.”

- Provision 4 Source 2, paragraph 60, page 16: “The DOE shall determine whether there are applicable host Party rules on local stakeholder consultation. Where such rules exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA, as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the rules.”
- Provision 5 Source 2, paragraph 61, page 16: “If applicable host Party rules on local stakeholder consultation do not exist, the DOE shall, by means of document review and interviews with local stakeholders and/or the DNA as appropriate, determine whether the local stakeholder consultation was conducted in accordance with the requirements in the “CD project standard for programmes of activities” related to: [...]”
- Provision 6 Source 2, paragraph 65, page 17: “If significant changes to the PoA design occurs after the local stakeholder consultation, the DOE shall determine whether a new local stakeholder consultation was conducted with relevant stakeholders in accordance with paragraphs 60 and 61 above.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The program does require project validation and verification entities to interview local stakeholders to assess whether the consultation was conducted according to the applicable rules.

### Indicator 6.1.26

#### Relevant scoring methodology provisions

“The program requires that projects be subject to public consultation on the global level via online facilities (e.g., submitting comments on an online platform or portal) prior to project registration.”

#### Information sources considered

- 1 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC\\_proc03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf).
- 2 CDM project cycle procedure for programmes of activities. CDM-EB93-A09-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sun8etcms/storage/contents/stored-file-20181221092012422/PC\\_proc02v02.pdf](https://cdm.unfccc.int/sun8etcms/storage/contents/stored-file-20181221092012422/PC_proc02v02.pdf).

#### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 17, page 9: “The project participants of a proposed CDM project activity shall complete a PDD, in accordance with the “CDM project standard for project activities”, and submit it together with supporting documentation to the DOE contracted by the project participants to perform validation of the project activity.”

- Provision 2 Source 1, paragraph 18, page 9: “The DOE shall make the PDD publicly available through a dedicated interface on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 30 days, except with respect to large-scale afforestation and reforestation (A/R) CDM project activities, for which the duration shall be 45 days.”
- Provision 3 Source 2, paragraph 10, page 8: “The DOE shall make the PoA-DD publicly available through a dedicated interface on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 30 days except with respect to large-scale afforestation and reforestation (A/R) CDM PoAs, for which the duration shall be 45 days.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

### Indicator 6.1.27

#### Relevant scoring methodology provisions

“The program requires that global public consultations of projects make available key information on the project, such as the project design documents and any supplemental project documentation.”

#### Information sources considered

- 1 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC\\_proc03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf).
- 2 CDM project cycle procedure for programmes of activities. CDM-EB93-A09-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC\\_proc02v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC_proc02v02.pdf).

#### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 17, page 9: “The project participants of a proposed CDM project activity shall complete a PDD, in accordance with the “CDM project standard for project activities”, and submit it together with supporting documentation to the DOE contracted by the project participants to perform validation of the project activity.”
- Provision 2 Source 1, paragraph 18, page 9: “The DOE shall make the PDD publicly available through a dedicated interface on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global



stakeholder consultation shall be 30 days, except with respect to large-scale afforestation and reforestation (A/R) CDM project activities, for which the duration shall be 45 days.”

- Provision 3 Source 1, paragraph 19, page 9: “When submitting the PDD through the dedicated interface, the DOE shall provide the following information to be made publicly available on the UNFCCC CDM website:
- (a) Reference to any previous publication of the PDD for public comments on the UNFCCC CDM website;
  - (b) The summary report of the comments received from local stakeholders during the local stakeholder consultation and how they have been taken into account;
  - (c) A summary of the environmental impact assessment report of the proposed CDM project activity, if the environmental impact assessment was conducted in accordance with the “CDM project standard for project activities”.”
- Provision 4 Source 2, paragraph 7, page 7: “The coordinating/managing entity of a proposed CDM PoA shall complete a programme of activities design document (PoA-DD), in accordance with the “CDM project standard for programmes of activities”, and submit it together with supporting documentation to the DOE contracted by the coordinating/managing entity or the project participants to perform validation of the PoA.”
- Provision 5 Source 2, paragraph 8, page 7: “The PoA-DD shall include a generic CPA-DD part (hereinafter referred to as generic CPA-DD), which:
- (a) Describes the technologies/measures to be employed and/or implemented by the corresponding CPAs, including a description of their common features;
  - (b) Defines the conditions and circumstances under which technologies/measures may be included as CPAs in the PoA, by establishing eligibility criteria for inclusion of CPAs in the PoA;
  - (c) Specifies how the corresponding CPAs are to be designed to ensure that they comply with all applicable CDM rules and requirements, including the requirements in the “CDM project standard for programmes of activities” and in the applied methodologies, the applied standardized baselines and any other standards, methodologies, methodological tools and guidelines applied in accordance with the applied methodologies (hereinafter “any other standards, methodologies, methodological tools and guidelines (to be) applied in accordance with the selected(applied) methodologies” are collectively referred to as the other (applied) methodological regulatory documents).”
- Provision 6 Source 2, paragraph 10, page 8: “The DOE shall make the PoA-DD publicly available through a dedicated interface on the UNFCCC CDM website for global stakeholder consultation. The duration of the period for submission of comments for the global stakeholder consultation shall be 30 days except with respect to large-scale afforestation and reforestation (A/R) CDM PoAs, for which the duration shall be 45 days.”

Provision 7 Source 2, paragraph 11, page 8: “When submitting the PoA-DD through the dedicated interface, the DOE shall provide the following information, to be made publicly available on the UNFCCC CDM website:

- (a) Reference to any previous publication of the PoA-DD for public comments on the UNFCCC CDM website;
- (b) The summary report of the comments received from local stakeholders during the local stakeholder consultation and how they have been taken into account, if local stakeholder consultation was conducted at the PoA level;
- (c) A summary of the environmental impact assessment report of the proposed CDM PoA, if the environmental impact assessment was conducted for the PoA in accordance with the “CDM project standard for programmes of activities”;
- (d) The CPA inclusion template, using the “Component project activity inclusion (CME inclusion) form” (CDM-CPA-INC-CME-FORM) if:
  - (i) It is indicated in a generic CPA-DD that the corresponding CPAs are deemed automatically additional in accordance with the “Methodological tool: Demonstration of additionality of microscale project activities”; and
  - (ii) The coordinating/managing entity intends to include such CPAs without validation by a DOE prior to inclusion.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

### Indicator 6.1.28

#### Relevant scoring methodology provisions

“The program requires that input received through global public consultations of projects is publicly documented, that the project owners must take due account of the inputs received, and that it is publicly documented how inputs received are addressed.”

#### Information sources considered

- 1 CDM project cycle procedure for project activities. CDM-EB93-A06-PROC. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC\\_proc03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092024737/PC_proc03v02.pdf).
- 2 CDM project cycle procedure for programmes of activities. CDM-EB93-A09-PROC. Version 02.0. Document issued on 29 November 2018. Online available at:

[https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC\\_proc02v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092012422/PC_proc02v02.pdf).

- 3 CDM validation and verification standard for project activities. CDM-EB93-A05-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg\\_stan06v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg_stan06v02.pdf).
- 4 CDM validation and verification standard for programmes of activities. CDM-EB93-A08-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg\\_Stan05v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg_Stan05v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 33, page 11-12: “Parties, stakeholders and UNFCCC accredited observers may submit comments, in English, on the validation requirements for the proposed CDM project to the DOE via a dedicated interface on the UNFCCC CDM website. The submitters of the comments shall provide the name and contact details of the individual or organization on whose behalf the comments are submitted. Comments from stakeholders shall:
- (a) Be specific to the proposed CDM project activity;
  - (b) Be related to the compliance with applicable CDM rules and regulations.”
- Provision 2 Source 1, paragraph 34, page 12: “The secretariat shall make the comments publicly available on the UNFCCC CDM website where the PDD is displayed, and shall remove those that the DOE has determined to be unauthentic in accordance with the “CDM validation and verification standard for project activities”.”
- Provision 3 Source 1, paragraph 35, page 12: “After the completion of the local stakeholder consultation, local stakeholders may submit a complaint to the DNA(s) of the host Party(ies) if they find that the outcome of the local stakeholder consultation is not appropriately taken into account. The DOE shall request the DNA(s) to forward such complaints, if any, to the DOE and promptly forward them to the project participants during the validation in accordance with the “CDM validation and verification standard for project activities”.”
- Provision 4 Source 2, paragraph 23, page 10: “Parties, stakeholders and UNFCCC accredited observers may submit comments, in English, on the validation requirements for the proposed CDM PoA to the DOE via a dedicated interface on the UNFCCC CDM website. The submitters of the comments shall provide the name and contact details of the individual or organization on whose behalf the comments are submitted. Comments from stakeholders shall:
- (a) Be specific to the proposed CDM PoA;
  - (b) Be related to the compliance with applicable CDM rules and regulations.”
- Provision 5 Source 2, paragraph 24, page 10: “The secretariat shall make the comments publicly available on the UNFCCC CDM website where the PoA-DD is displayed, and shall

remove those that the DOE has determined to be unauthentic in accordance with the “CDM validation and verification standard for programmes of activities”.

- Provision 6 Source 2, paragraph 25, page 11: “After the completion of the local stakeholder consultation, local stakeholders may submit a complaint to the DNA(s) of the host Party(ies) if they find that the outcome of the local stakeholder consultation is not appropriately taken into account. The DOE shall request the DNA(s) to forward such complaints, if any, to the DOE and promptly forward them to the coordinating/managing entity during the validation in accordance with the “CDM validation and verification standard for programmes of activities”.
- Provision 7 Source 2, paragraph 254, page 46: “The DOE shall determine whether authentic and relevant comments in the global stakeholder consultation were taken into due account in the PDD of the proposed CDM project activity.”
- Provision 8 Source 2, paragraph 256, page 46: “In case of doubt, the DOE shall determine the authenticity of the name and contact details of the individual or organization on whose behalf the comments have been submitted.”
- Provision 9 Source 3, paragraph 257, page 46: “Once the DOE has determined which submitted comments are authentic, it shall contact the secretariat to make them publicly available.”
- Provision 10 Source 3, paragraph 258, page 47: “The DOE shall determine whether the authentic comments are relevant to the following defined scope of comments:
- (a) The comment discusses issues specific to the proposed CDM project activity;
  - (b) The comment discusses issues related to the compliance with the relevant CDM rules and regulations.”
- Provision 11 Source 3, paragraph 259, page 47: “The DOE shall request the project participants to address all the comments that it determined to be authentic and relevant in accordance with paragraphs 256 and 258 above.”
- Provision 12 Source 3, paragraph 262, page 47: “A DOE shall make the revised PDD publicly available for global stakeholder consultation in accordance with the “CDM project cycle procedure for project activities” if it determines that:
- (a) The project participants that have a contractual relationship with the DOE have been replaced;
  - (b) Significant changes have been made to the project design; or
  - (c) The selected methodologies, the selected standardized baselines and/or the combination thereof have been changed by the project participants, unless the change only involves the removal and no addition of methodologies and/or standardized baselines, and the removal of the methodologies and/or the standardized baselines does not affect the physical design of, and the end-use services provided by, the proposed CDM project activity.”
- Provision 13 Source 3, paragraph 263, page 47: “If the DOE determines that significant changes have been made to the project design, the DOE may seek guidance from the Board on

whether the revised PDD shall be published for global stakeholder consultation in accordance with the “CDM project cycle procedure for project activities”.

- Provision 14 Source 4, paragraph 159, page 32: “The DOE shall determine whether authentic and relevant comments in the global stakeholder consultation were taken into due account in the PoA-DD of the proposed CDM PoA.”
- Provision 15 Source 4, paragraph 161, page 33: “In case of doubt, the DOE shall determine the authenticity of the name and contact details of the individual or organization on whose behalf the comments have been submitted.”
- Provision 16 Source 4, paragraph 162, page 33: “Once the DOE has determined which submitted comments are authentic, it shall contact the secretariat to make them publicly available.”
- Provision 17 Source 4, paragraph 163, page 33: “The DOE shall determine whether the authentic comments are relevant to the following defined scope of comments:
- (a) The comment discusses issues specific to the proposed CDM PoA;
  - (b) The comment discusses issues related to compliance with the relevant CDM rules and requirements.”
- Provision 18 Source 4, paragraph 164, page 33: “The DOE shall request the coordinating/managing entity to address all the comments that it determined to be authentic and relevant in accordance with paragraphs 161 and 163 above.”
- Provision 19 Source 4, paragraph 167, page 33: “A DOE shall make the revised PoA-DD publicly available for global stakeholder consultation in accordance with the “CDM project cycle procedure for programmes of activities” if it determines that:
- (a) The project participants or the coordinating/managing entity that have a contractual relationship with the DOE have been replaced;
  - (b) Significant changes have been made to the PoA design; or
  - (c) The selected methodologies, the selected standardized baselines and/or the combination thereof have been changed by the coordinating/managing entity, unless the change only involves the removal and no addition of methodologies and/or standardized baselines, and the removal of the methodologies and/or the standardized baselines does not affect the physical design of, and the end-use services provided by, CPAs corresponding to the generic CPAs that apply the methodologies and the standardized baselines that remain (i.e. the methodologies and, where applicable, the standardized baselines that were not removed).”
- Provision 20 Source 4, paragraph 168, page 33: “If the DOE determines that significant changes have been made to the PoA design, the DOE may seek guidance from the Board on whether the revised PoA-DD shall be published for global stakeholder consultation in accordance with the “CDM project cycle procedure for programmes of activities”.
- Provision 21 Source 3, paragraph 271, page 49: “The DOE shall report the results of its assessment in the validation report.”

Provision 22 Source 3, paragraph 272, page 49: “In its validation report, the DOE shall provide the following:

(a) A summary of the validation process and its conclusions;

(b) Results of the dialogue between the DOE and the project participants, as well as any adjustments made to the project design following the stakeholder consultation. It shall reflect the responses to CARs and CLs, the identification of FARs, and discussions on and revisions to the project documentation; [...]

Provision 23 Source 1, paragraph 155, page 29: “The secretariat shall make the revised PDD and the validation by the DOE publicly available on the UNFCCC CDM website. This version of the PDD shall be applied for future requests for issuance.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The program provisions do require a public documentation of comments from the global public consultations (Provision 2, Provision 5, and Provision 16) and that these inputs are addressed, for projects activities and programmes of activities (Provision 3, Provision 7, Provision 11, and Provision 18). It is only required that the project documents need to be revised based on the inputs (Provision 14) and the auditor needs to check if the inputs have been incorporated into the revised project documentation (Provision 19). The project documentation can be found on the website and Provision 23 implies that the PDD and validation report are publicly available too. The indicator is therefore considered to be fulfilled.

### Indicator 6.1.29

#### Relevant scoring methodology provisions

“The program requires that a validation and verification entity assesses whether the project owners have taken due account of all inputs received in the global stakeholder consultation.”

#### Information sources considered

- 1 CDM validation and verification standard for project activities. CDM-EB93-A05-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg\\_stan06v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092105818/Reg_stan06v02.pdf).
- 2 CDM validation and verification standard for programmes of activities. CDM-EB93-A08-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg\\_Stan05v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20190102091604136/Reg_Stan05v02.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 254, page 46: “The DOE shall determine whether authentic and relevant comments in the global stakeholder consultation were taken into due account in the PDD of the proposed CDM project activity.”
- Provision 2 Source 2, paragraph 159, page 32: “The DOE shall determine whether authentic and relevant comments in the global stakeholder consultation were taken into due account in the PoA-DD of the proposed CDM PoA.”

### Assessment outcome

Yes (1 Point).

### Justification of assessment

The above documentation clearly specifies that the indicator is fulfilled.

## Indicator 6.1.30

### Relevant scoring methodology provisions

“The program has established provisions that allow the public (both global and local project stakeholders) to submit comments to the program about a project at any time during project operation. This includes provisions for the program’s due consideration of the comments received and possible action to address the concern (e.g., halting the issuance of credits, deregistering the project, or requiring compensation for over-issuance).”

### Information sources considered

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### Relevant carbon crediting program provisions

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### Assessment outcome

No (0 Points)

### Justification of assessment

No such provision found.

## 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**

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**Relevant carbon crediting program provisions**

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**Assessment outcome**

No (0 Points).

**Justification of assessment**

The program has no such provisions.

**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 Decision 5/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. APPENDIX B Project design document for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).

**Relevant carbon crediting program provisions**

Provision 1 Source 1, appendix B, paragraph 2, page 76-77: “The purpose of this appendix is to outline the information required in the project design document. A project activity shall be described in detail in a project design document, taking into account the provisions for afforestation and reforestation project activities under the CDM as set out in the present annex, in particular, section G on validation and registration and section H on monitoring. The description shall include the following:

[...]

k) Socio-economic impacts of the project activity:

- (i) Documentation on the analysis of the socio-economic impacts, including impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. This analysis should include, where applicable, information on, inter alia, local communities, indigenous peoples, land tenure, local employment, food production, cultural and religious sites, and access to fuelwood and other forest products



(ii) If any negative impact is considered significant by the project participants or the host Party, a statement that project participants have undertaken a socio-economic impact assessment, in accordance with the procedures required by the host Party, including conclusions and all references to support documentation”

(l) A description of planned monitoring and remedial measures to address significant impacts referred to in paragraph 2 (j) (ii) and (k) (ii) above”

### **Assessment outcome**

No (0 Points).

### **Justification of assessment**

The program requires project participants to provide an analysis of the socio-economic impacts of the proposed afforestation or reforestation project activity in the project design document, including information on cultural and religious sites, and a description of planned monitoring and remedial measures to address relevant impacts (Provision 1). To deliver information on cultural and religious sites can however not be considered a safeguard on cultural heritage. The indicator is therefore not fulfilled.

### **Indicator 6.1.33**

#### **Relevant scoring methodology provisions**

“The program has safeguards in place in relation to health that at least address the need to avoid or minimize the risks and impacts to (community) health, safety and security that may arise from projects.”

#### **Information sources considered**

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#### **Relevant carbon crediting program provisions**

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### **Assessment outcome**

No (0 Points).

### **Justification of assessment**

The CDM has no such provisions in place.

## 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

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### Relevant carbon crediting program provisions

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### Assessment outcome

No (0 Points)

### Justification of assessment

The CDM has no such provision in place.

## Indicator 6.1.35

### Relevant scoring methodology provisions

“The program has safeguards in place in relation to labour rights that at least require projects to ensure decent and safe working conditions, fair treatment, sound worker-management relationships and equal opportunity for workers.”

### Information sources considered

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### Relevant carbon crediting program provisions

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### Assessment outcome

No (0 Points).

### Justification of assessment

There program has no such provisions.

## 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 CDM project standard for project activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg\\_stan04v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092046526/Reg_stan04v02.pdf).
- 2 CDM project standard for programmes of activities. CDM-EB93-A04-STAN. Version 02.0. Document issued on 29 November 2018. Online available at: [https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg\\_stan03v02.pdf](https://cdm.unfccc.int/sunsetcms/storage/contents/stored-file-20181221092036152/Reg_stan03v02.pdf).
- 3 Decision 5/CMP.1: Modalities and procedures for a clean development mechanism as defined in Article 12 of the Kyoto Protocol. APPENDIX B Project design document for afforestation and reforestation project activities under the clean development mechanism. Online available at: [https://cdm.unfccc.int/Reference/COPMOP/08a01\\_abbr.pdf](https://cdm.unfccc.int/Reference/COPMOP/08a01_abbr.pdf).

### Relevant carbon crediting program provisions

- Provision 1 Source 1, paragraph 165, page 34: “The project participants shall carry out an analysis of the environmental impacts of the proposed A/R CDM project activity, including impacts on biodiversity and natural ecosystems and impacts outside the project boundary. The project participants shall provide a summary of the analysis and references to all related documentation.”
- Provision 2 Source 2, paragraph 44, page 13: “The analysis of the environmental impacts and, as applicable, the environmental impact assessment referred to in this section shall be carried out for the whole PoA or at the CPA level. The coordinating/managing entity shall describe the level applied.”
- Provision 3 Source 2, paragraph 45, page 13: “If the coordinating/managing entity has chosen to carry out the analysis of the environmental impacts for the whole PoA, it shall carry out the analysis, including transboundary impacts (or, in the case of a proposed A/R CDM PoA, impacts on biodiversity and natural ecosystems and impacts outside the programme boundary), and provide a summary of the analysis and references to all related documentation.”
- Provision 4 Source 3, appendix B, paragraph 2, page 76-77: “The purpose of this appendix is to outline the information required in the project design document. A project activity shall be described in detail in a project design document, taking into account the provisions for afforestation and reforestation project activities under the CDM as set out in the present annex, in particular, section G on validation and registration and section H on monitoring. The description shall include the following:

[...]

(j) Environmental impacts of the project activity:

(i) Documentation on the analysis of the environmental impacts, including impacts on biodiversity and natural ecosystems, and impacts outside the project boundary of the proposed afforestation or reforestation project activity under the CDM. This analysis should include, where applicable, information on, inter alia, hydrology, soils, risk of fires, pests and diseases

(ii) If any negative impact is considered significant by the project participants or the host Party, a statement that project participants have undertaken an environmental impact assessment, in accordance with the procedures required by the host Party, including conclusions and all references to support documentation”

### **Assessment outcome**

No (0 Points).

### **Justification of assessment**

The CDM program provisions explicitly require the assessment of impacts on biodiversity (Provision 1). Provision 4 requires that also “information” on other aspects like soils should be included “where applicable” and thereby does not mandatorily request the analysis of the listed aspects. The indicator is therefore not sufficiently fulfilled.

### **Indicator 6.1.37**

#### **Relevant scoring methodology provisions**

“The program requires, at least for specific project types as defined by the program, the establishment of a specific benefits-sharing mechanism with local stakeholders (e.g., that part of carbon credit proceeds are made available for community activities).”

#### **Information sources considered**

-

#### **Relevant carbon crediting program provisions**

-

### **Assessment outcome**

No (0 Points).

### **Justification of assessment**

The CDM does not require the establishment of a specific benefits sharing mechanism with local stakeholders.

### 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

-

#### Relevant carbon crediting program provisions

-

#### Assessment outcome

No (0 Points).

#### Justification of assessment

The CDM does not explicitly prohibit the introduction of invasive non-native species.

### 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

-

#### Relevant carbon crediting program provisions

-

#### Assessment outcome

No (0 Points).

#### Justification of assessment

There program has no such provisions.

## 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

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

There program has no such specific guidance.

## 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

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM has no dedicated gender policy, strategy or action plan that integrates gender considerations and women empowerment into all aspects of its operations.

## Indicator 6.1.42

### Relevant scoring methodology provisions

“The program explicitly requires that stakeholder consultations are conducted in a gender sensitive manner, enabling equal participation.”

### Information sources considered

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM has no provision in place that requires that stakeholder consultations are conducted in a gender sensitive manner.

## Indicator 6.1.43

### Relevant scoring methodology provisions

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

### Information sources considered

-

### Relevant carbon crediting program provisions

-

### Assessment outcome

No (0 Points).

### Justification of assessment

The CDM has no provision in place that requires project developers to perform a gender safeguard assessment.

## Scoring results

According to the above assessment, the carbon crediting program achieves a total point score of 12 for the indicators. Applying the scoring approach in the methodology, this results in a score of 1.3 for the criterion.



## Annex: Summary of changes from previous assessment sheet versions

The following table describes the main changes implemented in comparison to the assessment from 31 January 2023.

<b>Topic</b>	<b>Rationale</b>
New project types	The table on the cover page was updated reflecting the new project types commercial afforestation and improved forest management.