

2 October 2015

Synopsis of Comments

Call for public input: Projects with long planning periods, negative impacts

1 INTRODUCTION

VCS issued a [60-day call for public input](#) on 18 June 2015 in respect of:

- 1) Projects with long planning periods: The VCS rules currently exclude projects which have been *operating* for periods of time without the benefit of carbon finance (on the premise that such projects are viable without it, and thus not additional). However, it is not clear whether it is appropriate to introduce additional rules for projects which have been in their *planning* stages for extended periods.
- 2) Projects with negative environmental, social and/or economic impacts: The VCS rules currently require all projects to summarize any environmental impact assessments or stakeholder consultations undertaken, and AFOLU projects must mitigate identified potential negative environmental and socio-economic impacts. However, it is not clear whether it is appropriate to introduce more prescriptive rules for all project types with respect to the assessment or mitigation of these impacts.

VCS received over 60 individual comments on these topics from a variety of stakeholders including project proponents, VVBs and NGOs. We are grateful for the time and effort our stakeholders committed to this process and thank all those who submitted comments.

The purpose of this document is to provide a synopsis of the comments received. VCS is currently evaluating whether and how it may revise its rules in light of the comments received.

2 SYNOPSIS OF COMMENTS

The following table identifies the topics most frequently commented on by stakeholders and summarizes the comments received in respect of each topic.

Topic	Subject	Summary of comments
Projects with negative environmental, social and/or economic impacts	General	<p>There was broad consensus that the existing VCS requirements for identifying and mitigating negative impacts of AFOLU projects are appropriate, and that it would make sense to extend this approach to non-AFOLU projects. However, several stakeholders suggested that it would be helpful if VCS provided additional guidance with respect to the scope of analysis that is expected by the existing requirements.</p> <p>Most stakeholders also pointed out that taking a “do no net harm” or “net positive” approach would be problematic in the absence of a full set of requirements for assessing such impacts, which was mostly viewed as outside the scope of the VCS Program.</p> <p>Several stakeholders pointed out that if VCS introduced more prescriptive requirements for assessing negative impacts, it could weaken demand for co-benefit standards like the Climate Community & Biodiversity Standards as project proponents would view conformance with VCS requirements as “good enough.” It was suggested that VCS should focus instead on streamlining use of co-benefit standards in conjunction with the VCS Standard.</p>
	Stakeholder consultations	<p>There was broad consensus that local stakeholder consultations would be an effective way to address projects which may have negative environmental, social and/or economic impacts. Importantly, several stakeholders pointed out that clear guidance from VCS would be necessary to ensure that stakeholder consultations were carried out in a consistent and robust manner, such that key groups affected by the project had a meaningful opportunity to participate in the consultation. Likewise, clear requirements would be necessary in order for VVBs to have the ability to require the project proponent to take mitigating action (eg, where the consultation raised legitimate concerns regarding the impacts of the project).</p> <p>In addition, several stakeholders pointed out that some flexibility should be afforded to the project proponent to determine how best to structure the consultation, particularly given the wide range of circumstances and impacts which may exist for</p>

		<p>different projects.</p> <p>It was also suggested that VCS should take steps to ensure that any requirements it may introduce for conducting stakeholder consultations not duplicate or conflict with requirements of co-benefit standards which may also be applied by the project.</p>
	Public comment periods	<p>In contrast to stakeholder consultations, a few stakeholders pointed out that public comment periods (hosted on the VCS website, for example) have historically not been particularly useful for project development. It was noted that under the CDM, for example, it is rare for projects to receive project-specific comments that contribute to improved project design. In the opinion of these stakeholders, a public comment period only serves to prolong the registration process.</p>
Projects with long planning periods	General	<p>There was almost definitive consensus that projects with long planning periods should not be of concern. In particular, most stakeholders pointed out that the assessment of additionality should focus on whether carbon finance is ultimately what led the project to be developed, rather than focusing on whether carbon finance was on the mind of the project proponent when the project was first conceived.</p>
	Prior consideration	<p>Most stakeholders found that introducing requirements akin to the CDM's prior consideration approach would be problematic. However, a few stakeholders did see value in requiring projects to inform VCS of their intent to seek registration within certain timeframes of their start dates.</p>