

Thank you for the opportunity to provide input on the draft version of the Draft Tool: Article 6.4 sustainable development tool.

The Integrity Council for the Voluntary Carbon Market (Integrity Council) is an independent governance body for the voluntary carbon market. In July 2023 we launched a set of [Core Carbon Principles](#) and an [Assessment Framework](#) that aim to set and enforce a definitive global threshold so that high-quality carbon credits efficiently mobilize finance towards urgent mitigation and climate resilient development. Established with a clear mandate, our objectives include:

1. Core Carbon Principles (CCPs): Develop, host, and curate a set of CCPs to define new threshold standards for high-quality carbon credits and identify CCP-eligible programs and methodologies.
2. Governance and Oversight: Provide governance and oversight over standard-setting organizations, ensuring adherence to CCPs and monitoring market infrastructure and participant eligibility.
3. Coordination and Management: Help coordinate and manage interlinkages between individual bodies, defining a roadmap for the responsible growth of the Voluntary Carbon Market.

The ICVCM plays a pivotal role in establishing and enforcing global threshold standards to ensure that high-quality carbon credits contribute to genuine and additional greenhouse gas reductions and removals. The CCPs act as a benchmark, setting rigorous thresholds on disclosure and sustainable development.

Why High-Integrity Carbon Credits?

High-integrity carbon credits are crucial for unlocking finance to reduce and remove emissions. The CCPs provide a credible means of identifying and pricing high-integrity carbon credits, reducing confusion, overcoming market fragmentation, and instilling confidence in buyers.

Aiding the Just Transition

A high-integrity voluntary carbon market accelerates the uptake of emerging technologies, supports nature and biodiversity, and directs funding to indigenous peoples and local communities. It sets an ambitious yet achievable benchmark, establishing a pathway for continuous improvement to strengthen the CCPs over time.

Continuous Improvement Work Programs (CIWPs)

To address key complex issues in the Voluntary Carbon Market (VCM), ICVCM has also initiated Continuous Improvement Work Programs (CIWPs). Covering topics such as Paris Alignment, Permanence, and Safeguards and Sustainable Development, these Programs will identify emerging best practices and innovative approaches that can be incorporated into the next version of the ICVCM Assessment Framework.

ICVCM is committed to realizing the full potential of voluntary carbon markets, ensuring they play a significant role in combating climate change and contributing to a sustainable future.

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Date: _ 1 December 2023

Legend for Columns

- 1 = Section Number in the document or Appendix
- 2= Paragraph, table or figure number
- 3 = Nature of input is general, technical or editorial
- 4 = Comment – the actual feedback or observation, including justification for what needs changing

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| | | G | <p>About IC-VCM:</p> <p>The Integrity Council for the Voluntary Carbon Market (Integrity Council) is an independent governance body for the voluntary carbon market.</p> <p>Mandate:</p> <ol style="list-style-type: none"> 1. Establish, host, and curate a set of Core Carbon Principles¹ (CCPs), to define new threshold standards for high-quality carbon credits and identify carbon-crediting programs which are CCP-Eligible and Categories of carbon credits that are CCP-Approved. 2. Provide governance and oversight over standard-setting organizations ensuring adherence to CCPs and monitoring market infrastructure and participant eligibility. 3. Help coordinate and manage interlinkages between individual bodies, defining a roadmap for the responsible growth of the Voluntary Carbon Market. <p>Approach:</p> <p>To ensure the voluntary carbon market accelerates a just transition to 1.5°C, the Integrity Council has developed a Rule Book² that, along with the Assessment Procedure³ and the Summary for Decision Makers⁴, serves as assessment framework for carbon-crediting programs and Categories of carbon credits.</p> <p>The Rule Book sets a robust, achievable threshold that aims to raise standards across the voluntary carbon market to a consistent level of quality.</p> <p>Purpose of this submission: to respond to UNFCCC SB call for input by informing on-going discussions guiding the development of the current draft SD tool.</p> | |
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| | | | This submission aims to provide information about IC-VCM's treatment of SD & and Social and Environmental Safeguards as part of its Core Carbon Principles and Rule Book ⁵ . | | |

¹ <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-2-R2-FINAL-26Jul23.pdf>

² <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-4-R2-FINAL-26Jul23.pdf>

³ <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-6-R2-FINAL-26Jul23.pdf>

⁴ <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-3-R2-FINAL-26Jul23.pdf>

⁵ <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-4-R2-FINAL-26Jul23.pdf>, Pages 63 – 69 Program Level / 95-96 Category Level

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| 1 | 1 | G | <p>The Integrity Council seeks to help the VCM scale up by enabling participants in the market to more easily identify high-quality carbon credits. The VCM currently comprises several carbon-crediting programs (also known as carbon standards) that recognise activities and their mitigation impacts. Those mitigation activities are developed and operated by mitigation activity proponents and their design is validated by accredited third parties (validation and verification bodies (VVBs)). Greenhouse gas emission reductions or removals achieved by those mitigation activities are then verified by VVBs and issued by carbon-crediting programs in their registries as carbon credits. These credits may then be acquired and used by entities to help manage their environmental commitments.</p> <p>All carbon-crediting programs have adopted requirements, procedures, and policies to address administrative and operational considerations for developing and implementing their programs known as normative program documents. However, carbon credits issued by these programs differ in quality. The aim of the Integrity Council’s CCPs and Assessment Framework is to help VCM participants identify the high-quality carbon credits and to evolve a threshold for quality and integrity across the VCM that will build confidence and comparability.</p> <p>Two levels of assessment</p> <p>The Assessment Framework operates at two different levels: Program: The ICVCM Assessment Framework establishes eligibility requirements at the program level through the application of specific criteria and requirements for carbon-crediting programs. Carbon-crediting programs will apply to be assessed on whether they meet the requirements, and successful programs will become CCP-Eligible.</p> <p>Categories of carbon credits: The ICVCM also establishes criteria and requirements for categories of carbon credits (“Categories”). Individual Categories will be assessed, and those meeting the associated requirements will become CCP-Approved. Carbon credits belonging to CCP-Approved Categories may then be ‘tagged’ by CCP-Eligible programs accordingly. CCP-Approved Categories may also be tagged with supplemental identifying criteria, known as CCP</p> | |
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| | | | Attributes, which identify additional high-quality aspects of the carbon credits that may be of interest to market participants. | | |

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| 2 | 2.1 | G | <p>Sustainable Development & Safeguards rationale</p> <p>In a high-integrity VCM, carbon-crediting programs take steps to ensure that mitigation activities adhere to environmental and social safeguards and contribute to the Sustainable Development Goals (SDGs). Carbon-crediting programs have measures in place to ensure that in the context of the host country, mitigation activity proponents inform how SDG impacts are consistent with SDG objectives of the country, respect human rights and comply with relevant safeguards.</p> <p>Program-level processes ensure that mitigation activity proponents assess environmental and social risks associated with proposed mitigation activities, taking into account the size and scale of the relevant mitigation activity. Where the context requires, mitigation activities are required to ensure free, prior and informed consent (FPIC) processes with Indigenous Peoples and Local Communities (IPs & LCs), protect and improve livelihoods, protect and restore biodiversity and ecosystem services, enhance climate resilience and adaptation, reduce pollution, and be transparent about the sharing of benefits from the mitigation activity with IPs and LCs. Carbon-crediting programs must also ensure compliance with relevant national requirements, applicable laws and rules of the relevant jurisdiction.</p> <p>In that context, the Assessment Framework builds on the work of widely applied best-in-class standards including the World Bank, International Finance Corporation, United Nations Development Programme, United Nations Declaration on the Rights of Indigenous Peoples, United Nations Environment Programme, the Cancun Safeguards, and the International Labour Organization Fundamental Conventions, among others.</p> | |
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| 5 | 1 | T | <p>Core Carbon Principle</p> <p>7. SUSTAINABLE DEVELOPMENT BENEFITS AND SAFEGUARDS</p> <p>The carbon-crediting program shall have clear guidance, tools and compliance procedures to ensure mitigation activities conform with or go beyond widely established industry best practices on social and environmental safeguards while delivering positive sustainable development impacts.</p> | | |
| 5 | 12 | T | <p>Program level</p> <p>CRITERION 7.10: CANCUN SAFEGUARDS</p> <p>Requirements</p> <p>a) The carbon-crediting program shall, for all REDD+ mitigation activities, require that the mitigation activity is consistent with all relevant Cancun Safeguards as set out in paragraph 71 of decision 1/ CP.16 of the United Nations Framework Convention on Climate Change.⁶</p> | | |

⁶ <https://unfccc.int/resource/docs/2010/cop16/eng/07a01.pdf>

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| 5 | 13 | T | <p>Program level</p> <p>CRITERION 7.1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS</p> <p>Requirements</p> <p>a) In addition to CORSIA requirements relating to Safeguards System and Sustainable Development Criteria, the carbon-crediting program shall require mitigation activity proponents to:</p> <p><i>1) abide by national and local laws, objectives, programs and regulations and, where relevant, international conventions and agreements;⁷</i></p> <p><i>2) assess associated risks of negative environmental and social impacts with regard to the safeguards contained in criteria 7.2 to 7.8 (inclusive), taking into account the scope and scale of the mitigation activity;</i></p> <p><i>3) ensure free, prior and informed Consent (FPIC) processes for IPs & LCs, where applicable, and conduct stakeholder consultations, including local stakeholders, as part of project design and implementation in a manner that is inclusive, culturally appropriate, and respectful of local knowledge, take these consultations into account and respond to local stakeholders' views.</i></p> <p>b) Where, pursuant to criterion 7.1 a) 2) above, the mitigation activity proponents have assessed that the mitigation activity poses risks of negative environmental and/or social impacts with regard to any of criteria 7.2 to 7.8 (inclusive) the carbon-crediting program shall require the mitigation activity proponents to:</p> | |
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| | | | <p><i>1) include measures, commensurate with the identified risks, to minimise and address such negative environmental and/or social impacts, in validated design documents prior to registration;</i></p> <p><i>2) include information on the measures implemented pursuant to criterion 7.1 b) 1) above, commensurate with the identified risks in the monitoring report.</i></p> | | |

⁷ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

<https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

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| 5 | 5.2.1 15 | T | <p>Core Carbon Principle 13 CONTRIBUTION TO NET ZERO TRANSITION</p> <p>The mitigation activity shall avoid locking-in levels of GHG emissions, technologies or carbon-intensive practices that are incompatible with the objective of achieving net zero GHG emissions by mid-century.</p> <p>CRITERION 13.1 CATEGORIES INCOMPATIBLE WITH CONTRIBUTION TO NET ZERO TRANSITION</p> <p>Requirements</p> <p>a) Carbon credits issued under Categories listed in criterion a) 1) below are not eligible to be CCP-Approved:</p> <p>1) categories:</p> <p><i>i. mitigation activities that directly lead to an increase in the extraction of fossil fuels (e.g., exploration and extraction of fossil fuels);</i></p> <p><i>ii. mitigation activities relating to coal-fired electricity generation;</i></p> <p><i>iii. mitigation activities that involve any other unabated fossil fuel-powered electricity generation, other than new gas-fired generation that is part of increased zero-emissions generation capacity in support of national low carbon energy transitions; iv. mitigation activities focused on road transport that rely on the continued use of solely fossil fueled powered engines.</i></p> | | |
| 5 | 5.2.2 18 5.3.3 46 | T | <p>Program-level</p> | | |

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| | | | <p>CRITERION 7.3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity minimises:</p> <p style="margin-left: 20px;"><i>1) pollutant emissions to air;</i></p> <p style="margin-left: 20px;"><i>2) pollutant discharges to water, noise and vibration;</i></p> <p style="margin-left: 20px;"><i>3) generation of waste and release of hazardous materials, chemical pesticides and fertilisers.</i></p> <p>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents:</p> <p style="margin-left: 20px;"><i>1) whether the mitigation activity results in pollutant emissions to air, pollutant discharges to water, noise and vibration, the generation of waste, the release of hazardous materials, chemical pesticides and fertilisers;</i></p> <p style="margin-left: 20px;"><i>2) where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in criterion 7.1 b) 1) above.</i></p> | | |

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| 5 | 5.2.3 | T | <p>Program-level</p> <p>CRITERION 7.5: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES</p> <p>Requirements</p> <p><i>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity:</i></p> <ol style="list-style-type: none"> <i>1) avoids, or where this is not feasible, minimises negative impacts on terrestrial and marine biodiversity and ecosystems;</i> <i>2) protects the habitats of rare, threatened, and endangered species, including areas needed for habitat connectivity;</i> <i>3) does not convert natural forests, grasslands, wetlands, or high conservation value habitats;</i> <i>4) minimises soil degradation and soil erosion;</i> <i>5) minimises water consumption and stress in the mitigation activity.</i> <p><i>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents:</i></p> <ol style="list-style-type: none"> <i>1) whether the mitigation activity has negative impacts on terrestrial and marine biodiversity and ecosystems, on habitats of rare, threatened, and endangered species, on soil degradation and soil erosion, and on water consumption and water stress;</i> <i>2) where the mitigation activity results in any of the impacts listed in 1) above, that it has put in place the measures referred to in criterion 7.1 b) 1) above.</i> | | |
| 5 | 5.3.1 | T | <p>Program-level</p> | | |

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| | | | <p>CRITERION 7.7: RESPECT FOR HUMAN RIGHTS, STAKEHOLDER ENGAGEMENT</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity:</p> <p style="margin-left: 20px;"><i>1) avoids discrimination and respects human rights;</i></p> <p style="margin-left: 20px;"><i>2) abides by the International Bill of Human Rights⁸ and universal instruments ratified by the host country;</i></p> <p style="margin-left: 20px;"><i>3) takes into account and responds to local stakeholders' views.</i></p> <p>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards, or that it has put in place the measures referred to in criterion 7.1 b) 1) above.</p> | | |

⁸ <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights>

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| 5 | 5.3.2 | T | <p>Program-level</p> <p>CRITERION 7.2: LABOUR RIGHTS AND WORKING CONDITIONS</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity:</p> <p style="margin-left: 20px;"><i>1) provides safe and healthy working conditions for employees;</i></p> <p style="margin-left: 20px;"><i>2) provides fair treatment of all employees, avoiding discrimination and ensuring equal opportunities;</i></p> <p style="margin-left: 20px;"><i>3) prohibits the use of forced labour, child labour, or trafficked persons, and protects contracted workers employed by third parties.</i></p> <p>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in criterion 7.1 b) 1) above.</p> | | |

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| 5 | 5.3.4 | T | <p>Program-level</p> <p>CRITERION 7.8: GENDER EQUALITY</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity:</p> <p style="margin-left: 20px;"><i>1) provides for equal opportunities in the context of gender;</i></p> <p style="margin-left: 20px;"><i>2) protects against and appropriately responds to violence against women and girls; 3) provides equal pay for equal work.</i></p> <p>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in criterion 7.1 b) 1) above.</p> | | |

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| 5 | 5.3.5 | T | <p>Program-level</p> <p>CRITERION 7.4: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity avoids, or where this is not feasible, minimises forced physical and or economic displacement.</p> <p>b) The carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents:</p> <p><i>1) whether the mitigation activity results in forced physical and/or economic displacement;</i></p> <p><i>2) where the mitigation activity results in the impacts listed in 1) above, that it has put in place the measures referred to in criterion 7.1 b) 1) above.</i></p> | | |

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| 5 | 5.3.6 5.3.8 | T | <p>Program-level</p> <p>CRITERION 7.6: INDIGENOUS PEOPLES, LOCAL COMMUNITIES, AND CULTURAL HERITAGE</p> <p>Requirements</p> <p>a) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, the carbon-crediting program shall require mitigation activity proponents to ensure that the mitigation activity:</p> <p><i>1) recognises, respects and promotes the protection of the rights of IPs & LCs in line with applicable international human rights law, and the United Nations Declaration on the Rights of Indigenous Peoples and ILO Convention 169 on Indigenous and Tribal Peoples;⁵⁹</i></p> <p><i>2) identifies the rights-holders possibly affected by the mitigation activity (including customary rights of local rights holders);</i></p> <p><i>3) when relevant to circumstances, has applied the FPIC process;</i></p> <p><i>4) does not force eviction or any physical or economic displacement of IPs & LCs, including through access restrictions to lands, territories, or resources, unless agreed upon with IPs & LCs during the FPIC process;</i></p> <p><i>5) preserves and protects cultural heritage consistent with IPs & LCs protocols/rules/plans on the management of cultural heritage or UNESCO Cultural Heritage conventions.</i></p> <p>b) Where the mitigation activity directly or indirectly impacts IPs & LCs, including livelihoods, ancestral knowledge and cultural heritage, the carbon-crediting program shall require that mitigation activity proponents confirm in validated design documents that the mitigation activity adheres to the above safeguards or that it has put in place the measures referred to in criterion 7.1 b) 1) above.</p> | |
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| 5 | 5.3.7 | T | <p>Program-level principle 1. EFFECTIVE GOVERNANCE</p> <p>The carbon-crediting program shall have effective program governance to ensure transparency, accountability, continuous improvement and the overall quality of carbon credits.</p> <p>CRITERION 1.1: EFFECTIVE GOVERNANCE</p> <p>a) In addition to CORSIA requirements related to governance framework, the carbon-crediting program shall:</p> <p>.....</p> <p>4) <i>have robust anti-money laundering processes in place;</i></p> <p>5) <i>follow practices consistent with robust anti-bribery and anti-corruption guidance and regulation.</i></p> | | |

⁹ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

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| 5 | 66 | T | <p>CRITERION 1.2: PUBLIC ENGAGEMENT, CONSULTATION, AND GRIEVANCES</p> <p>a) In addition to CORSIA requirements related to public engagement, consultation and grievances, the carbon-crediting program shall have a process for:</p> <p><i>1) robust and transparent local and global stakeholder consultation, which provide for public comment and issue resolution;</i></p> <p><i>2) addressing grievances, for which the process shall be clear and transparent, ensure impartiality and where appropriate, confidentiality, in the filing and resolution of grievances and for which any applicable fees shall not impede legitimate access to the grievance process by civil society organisations or of Indigenous Peoples and Local Communities (IPs & LCs).</i></p> | | |

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| 5 | 73 | T | <p>CRITERION 7.9: ROBUST BENEFIT-SHARING</p> <p>Requirements</p> <p>a) Where the carbon-crediting program requires arrangements for benefit-sharing with IPs & LCs, the carbon-crediting program shall require that mitigation activity proponents:</p> <p><i>1) include in validated design documents information on how benefit-sharing arrangements that are appropriate to the context and consistent with applicable national rules and regulations will be designed and implemented through a benefit-sharing plan;</i></p> <p><i>2) confirm in validated design documents that the draft and final benefit-sharing plan have been shared with the affected IPs & LCs in a form, manner, and language understandable to them;</i></p> <p><i>3) make benefit-sharing outcomes that result from the benefit-sharing plan publicly available, subject to applicable legal restrictions.</i></p> | | |

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| 6 | 74 | T | <p>Program level</p> <p>CRITERION 7.11: ENSURING POSITIVE SDG IMPACTS</p> <p>Requirements</p> <p>a) The carbon-crediting program shall require that mitigation activity proponents, in validated design documents:</p> <p><i>1) provide information on how the mitigation activity is consistent with the SDG objectives of the host country, where the SDG objectives are relevant, and such is feasible;</i></p> <p><i>2) demonstrate, if applicable, through qualitative assessment how the mitigation activity delivers positive SDG impacts for certain SDGs (excluding SDG 13), if any; 3) provide information on any standardised tools and methods that were used to assess the SDG impacts.</i></p> <p>The Program-level criteria contain numerous requirements applicable to how carbon-crediting programs ensure mitigation activities have addressed risks relating to safeguards and sustainable development. In order to establish criteria applicable to all carbon credits, including those that might have been issued earlier, the ICVCM have created the baseline Category-level criteria in 12.1 and 12.2 below.</p> <p>Category-level</p> <p>CRITERION 12.2 SUSTAINABLE DEVELOPMENT BENEFITS</p> <p>Requirements</p> | |
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| | | | <p>a) Mitigation activities shall meet CORSIA requirements related to sustainable development.</p> <p>b) Where a Category is typically also operating under a third party linked certification scheme or third party-linked robust set of requirements³⁰ that are relevant to sustainable development benefits, or to specific further requirements of the carbon-crediting program relating to sustainable development, the carbon-crediting program shall provide such information for assessment in the Assessment Platform.</p> | | |
| 5 | 13 | T | <p>Category-level</p> <p>CRITERION 12. 1 SAFEGUARDS</p> <p>Requirements</p> <p>a) Mitigation activities shall meet CORSIA requirements related to Safeguards systems.</p> <p>b) Where a Category is typically also operating under a third party-linked certification scheme or third party-linked robust set of requirements that are relevant to safeguards (e.g., IFC Environmental and Social Performance Standards) or to specific further requirements of the carbon-crediting program relating to safeguards, the carbon-crediting program shall provide such information for the assessment process in the Assessment Platform.</p> | | |

¹⁰ For example, Gold Standard SDG Impact Tool (operated by the Gold Standard), Sustainable Development Verified Impact Standard (SD Vista) (operated by Verra), Climate, Community & Biodiversity Standards (CCB) (operated by Verra)

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| 7-8 | | T | <p>Attribute “Quantified positive SDG impacts”</p> <p>This attribute refers to whether the mitigation activity quantifies a positive contribution to Sustainable Development (excluding SDG 13). It differs from requirements in Section 4.C.7 of the Assessment Framework (criteria related to Sustainable Development Benefits and Safeguards) because the attribute relates to quantification of impacts.</p> <p>This will facilitate the identification of carbon credits with quantified positive impacts of this type. Such quantified positive SDG impacts must align with the sustainable development priorities of the host country, where those are relevant to the mitigation activity</p> | | |

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| 2 | 2.2 / 2.3 | G | <p>The Integrity Council understand that ensuring no-net harm and delivering net-positive SD contributions is an area continuously evolving. Therefore, current version of the Rule Book reflects best practice available building in market infrastructure. It has established Continuous Improvement Work Programs¹¹ to focus on:</p> <p>Safeguards</p> <p>Requirements ensuring:</p> <p>In relation to criterion 7.1: Assessment and management of environmental and social risks</p> <ul style="list-style-type: none"> • assessment by the carbon-crediting program of the environmental and social risks associated with the mitigation activity, activity type, or host country, which take into account the scope and scale of a mitigation activity; • validation and verification requirements related to environmental and social safeguards; • best practice with regard to local stakeholder consultations and FPIC processes for IPs & LCs, in particular how these can be designed to be more inclusive and reflect the views of women and vulnerable and/or marginalised groups. <p>In relation to criterion 7.3 Resource efficiency and pollution prevention</p> <ul style="list-style-type: none"> • the mitigation activity promotes more sustainable use of resources, including energy and water. <p>In relation to criterion 7.4 Land acquisition and involuntary resettlement</p> <ul style="list-style-type: none"> • the meaningful and informed participation of affected individuals and communities in the planning, implementation, and monitoring of resettlement activities, including, where applicable, FPIC; | |
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| Section no. | Para., table or figure no. | Type of input G = general T = technical E = editorial | Comment | Proposed change (Include proposed text) | Assessment of comment <i>(Completed by secretariat)</i> |
| | | | <ul style="list-style-type: none"> • that where avoidance of displacement is not feasible, displacement only occurs with the consent of affected parties, with full justification and appropriate legal protection and compensation and is accepted by affected communities. | | |

¹¹ <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-4-R2-FINAL-26Jul23.pdf>, Pages 70 and 71

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|----------|------------------|----------|--|--|
| 2 | 2.2 / 2.3 | G | <p>In relation to criterion 7.5 Biodiversity conservation and sustainable management of living natural resources</p> <ul style="list-style-type: none"> • consistency with conservation objectives for terrestrial and marine habitats; • compliance with international, national and local laws regulating the introduction of invasive alien species of flora and fauna affecting biodiversity; • no conversion of natural forests, grasslands, wetlands or high conservation value habitats; • the protection of habitats of rare, threatened, and endangered terrestrial and marine species, including areas needed for habitat connectivity; • the minimisation of soil degradation, soil erosion, water consumption, and water stress in the mitigation activity area. <p>In relation to criterion 7.6 Indigenous Peoples, Local Communities, and cultural heritage</p> <ul style="list-style-type: none"> • avoidance of negative impacts on land, territories, and resources protected under relevant laws and regulations concerning IPs & LCs; • avoidance of negative impacts on the self-determined climate, conservation, and sustainable development priorities, decision-making mechanisms, and forms of self- government of IPs & LCs as defined by them in alignment with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)⁸ and ILO Convention 169 on Indigenous and Tribal Peoples; • respect for areas inhabited by or believed to be inhabited by uncontacted or isolated IPs & LCs; • translation of relevant documents into relevant and appropriate languages(s) including with regard to Article 13 of the UNDRIP. <p>In relation to criterion 7.8 Gender Equality</p> <ul style="list-style-type: none"> • a gender assessment and gender action plan; | |
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| | | | <ul style="list-style-type: none"> • use of gender disaggregated data to monitor, assess and report on gender impacts. <p>In relation to criterion 7.9 Robust benefit-sharing</p> <ul style="list-style-type: none"> • transparency on use and management of revenues for benefit sharing. | | |

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| Section no. | Para., table or figure no. | Type of input G = general T = technical E= editorial | Comment | Proposed change (Include proposed text) | Assessment of comment <i>(Completed by secretariat)</i> |
| 2 | 2.2 / 2.3 | G | <p>Sustainable Development</p> <p>The Integrity Council is aware that further work is needed to improve sustainable development benefits associated with mitigation activities. For the next iteration of the Assessment Framework, and through the Continuous Improvement work program¹², the Integrity Council will draw upon available SDG impact measurement and management protocols including third party certification requirements to develop further criteria and a risk and impact rating framework for Categories.</p> <p>In relation to criterion 12.2 Sustainable Development Benefits</p> <ul style="list-style-type: none"> • The ICVCM will consider requiring methodologies to require evidence of level of change achieved and the degree to which sustainable development benefits can be attributed to the mitigation activity. • The ICVCM will consider requiring methodologies to include provisions promoting net positive sustainable development benefit. | | |

¹² <https://icvcm.org/wp-content/uploads/2023/07/CCP-Section-4-R2-FINAL-26Jul23.pdf>, Page 97

