

Name	Organisation	Date submitted	Criterion, Indicator	Comments	Proposed changes
Ben	University of Cambridge	16 July 2008	B1	If this standard is to meaningfully identify projects that contribute to biodiversity conservation, it should exclude non-native species from being used	change "invasive" to "non-native or invasive"
Ben	University of Cambridge	16 July 2008	B1, 3	"Invasive species" need to be clearly defined, e.g. any species listed on the Global Invasive Species Database (see: http://www.issg.org/database/).	Add a footnote to define what an invasive species is
Ben	University of Cambridge	16 July 2008	B2	This section only appears to require proponents to "identify, document and evaluate". It should also require that they *ensure* there are no negative impacts	Insert an additional indicator "Ensure that no offsite high biodiversity conservation values will be negatively affected by the project."
Ben	University of Cambridge	16 July 2008	B2, 2	The wording of this indicator allows proponents to make plans but does not require them to act on them	Change "Document how the project plans to mitigate these negative offsite biodiversity impacts" to "Document and carry out plans to mitigate these negative offsite biodiversity impacts".
Ben	University of Cambridge	16 July 2008	B3	This section is again weakly worded, so that proponents are only required to make plans, not to do anything	The opening words of all three indicators should be re-worded as follows: "1. Draw up and follow a plan for... 2. Draw up and follow a plan for... 3. Make the results of monitoring available..."
Ben	University of Cambridge	16 July 2008	GL2	The vulnerability/irreplaceability criteria are good, but I would expect this section to give a stronger guarantee of exceptional biodiversity benefits. As it stands, this section would allow a project to be given Gold	This Gold Level section needs more indicators which should include the following (which can obviously be reworded - this is just a description): - Projects should go beyond a verbal justification for the use of non-native

				<p>Level even if it involved a plantation of non-native trees being planted on a concession which held a small patch of remnant habitat containing an endangered species. It would also allow a project to engage in logging a forest, if the “baseline scenario” projected that forest to have been completely cleared, because even with the logging, the biodiversity impact would be positive compared to the baseline scenario. The indicators (vulnerability and irreplaceability) are useful, but only in identifying whether the project is in an area important for biodiversity. There must be a significant level of biodiversity additionality.</p>	<p>species, and be required to collect evidence to show that their use is more beneficial than using native species (e.g. by collecting information on the extent to which firewood collecting is reduced by planting non-native trees near a village). - Projects should only be considered that directly protect, enhance or restore natural or semi-natural habitats with high biodiversity conservation values. - A more stringent form of baseline should be used, such as landcover in a reference year (e.g. 2005). The project should aim to restore the biodiversity value of a site should not be allowed to decrease below that baseline, so if a site had 90% forest canopy cover in 2005 (this information is available in retrospect from satellite imagery), it must be maintained above that level, even if it has been degraded since then. That will avoid the obvious problem of countries first degrading areas (e.g. by clear-felling them) and then later entering those same areas into agroforestry projects.</p>
Ben	University of Cambridge	16 July 2008	Appendix B	<p>“Invasive species” need to be more clearly defined: e.g. any species listed on the Global Invasive Species Database (see: http://www.issg.org/database/).</p>	<p>Change entry for "Invasive Species" to: "Those non-native species which threaten ecosystems, habitats or species, including (but not limited to) any species listed on the Global Invasive Species Database (http://www.issg.org/database/).</p>

Ben	University of Cambridge	16 July 2008	General	<p>Verification checks every five years are quite infrequent. There should be some mechanism whereby third parties (e.g. local communities, NGOs etc.) can report breaches of the standard, which if confirmed, would result in the standard being revoked from that project. There appears to be a loophole for combined projects. For example, a project that combines a very large plantation of a non-native species with protection of a very small forest reserve would be eligible for Gold Level. A suggestion here is that it should not be permissible for projects to be combined in this way, or at least, for the different elements of a project (here, tree planting and forest protection) to be evaluated separately. I would like to retract my first comment which called for the exclusion of non-native species from all projects, as this is likely to be impractical in some cases. Use of non-native species should, however, only be permitted if there is very strong justification. Other than the issues on which I've submitted comments, I think that it looks like a good document, well-designed, well-thought out and clear. Congratulations.</p>	
Ben	University of Cambridge	23 July 2008	GL2, 2.5	I am not clear what the criterion "Bioregionally restricted assemblages" means. This appears to be a poorly-	Remove criterion 2.5 "Bioregionally restricted assemblages" (or clearly define what it means).

				defined catch-all that could let virtually any project claim to be Gold Level, without in fact providing "exceptional" biodiversity benefits.	
Luís Fernando Guedes Pinto	IMAFLORA	23 July 2008	General	Consider to keep the silver level, to distinguish those who reach one or two optional from those who reach all.	keep the silver level
Luís Fernando Guedes Pinto	IMAFLORA	23 July 2008	G1.5	Distinguish beneficiaries, communities and stakeholders in different levels.	Introduce the concept of beneficiaries of the project, besides the community ones.
Luís Fernando Guedes Pinto	IMAFLORA	23 July 2008	G1.5	Be more clear about tenure and rights. Not only will not encroach private property, but demonstrate clear ownership or rights of the land of the project.	Demonstrate the land ownership or property right of the land of the project
Luís Fernando Guedes Pinto	IMAFLORA	23 July 2008	CM1.1	Include beneficiaries	Used appropriate methodologies to estimate to impacts on communities and beneficiaries of the project
Dr Colin Hunt	Economy & Environment and University of Queensland School of Economics	28 July 2008	B1.4	Any plantation monoculture or plantation of narrow species composition, especially when these are exotics, may have an adverse impact on biodiversity. The impact is likely to be severe when such plantations replace native forest, but there may also be negative impacts even when such plantations replace degraded lands or grasslands. In 4: "Project proponents must justify any use of non-native species over native species." The reality is that quick-growing non-native species often generate far greater returns than	A project that contains plantations should demonstrate that it generates net biodiversity benefits overall though other components of the project.

				natives, so it will be easy to justify their use. This section seems to be very weak and it begs the question: Will a tick of approval be given by CCB to non-native plantations simply because they are justified on grounds of delivering greater socio-economic benefits?	
Dr Colin Hunt	Economy & Environment and University of Queensland School of Economics	28 July 2008	Introduction	2nd para. Only avoided deforestation reduces CO2 emissions. Plantations, A/R, etc. sequester carbon i.e. remove carbon already in the atmosphere.	Change wording to reflect comment.
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	G1	In Section G1, it has been stated that the original conditions at the project area and the surrounding project zone before the project commences must be described.	The requirement to define surrounding project zone adds to complexity as the boundaries of the adjacent communities potentially affected by the project is always open to debate and not well-defined. Instead conditions of communities in and around the project area is more appropriate (In v1.0, the original conditions at the project site before the project commences was to be described.)
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	G1	As part of community information, socio-cultural details like description shared history, shared culture, shared livelihood systems, shared relationships with one or more natural resources and shared customary institutions and rules governing the use of resources has to be collected.	Such additional requirements should be part of GOLD Standard criteria.

Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	G3	In project design and goals, we do appreciate the stress given to transparency in project operation and communication of the GHG emissions reductions....	We will like to get a clarification whether we need to give ERPA/term sheet/other credit sale-purchase documents in this regard?
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	G4	In section G4, management capacity and best Practices Concept stresses on projects that include a significant capacity-building (training, skill building, etc.) component are more likely to sustain the positive outcomes generated by the project and have them replicated elsewhere. Best practices for project management include: local stakeholder employment, worker rights, worker safety and a clear process for handling any grievances.	Best practices concept should be a part of GOLD Standard
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	CL1	CCBA has proposed for estimating the net change in the emissions of CH4 and N2O in the with and without project if those gases are likely to account for more than 5% (in terms of CO2 equivalents) of the project's overall GHG impact, or provide evidence that they will not account for more than 5% of the total project emissions reductions over each monitoring period instead of the earlier 15%.	It is suggested that the cut-off should be 10% as is the norm in IPCC guidelines.
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	CM1	In section CM1, as part of net positive community Impacts, projects must maintain or enhance the high ecosystem service conservation value	We are of the opinion that this criterion should be part of GOLD standard

				in the project zone because of their importance to the communities' well-being.	
Emergent Ventures India Private Ltd.	Emergent Ventures India Private Ltd.	1 Aug 2008	CL1	CCBA has proposed for estimating the net change in the emissions of CH4 and N2O in the with and without project if those gases are likely to account for more than 5% (in terms of CO2 equivalents) of the project's overall GHG impact, or provide evidence that they will not account for more than 5% of the total project emissions reductions over each monitoring period instead of the earlier 15%.	It is suggested that the cut-off should be 10% as is the norm in IPCC guidelines.
Sarisha Ramanand	Wildlands Conservation Trust	5 Aug 2008	All	The revised version of the CCB Standards are more understandable in terms of its jargon. More detail within all indicators leaves little room for confusion and uncertainty. However, a question i have is why has the silver certification been excluded?	understandably, a high degree of integrity is required from the project to make it scientifically viable and sound and it should not be any other way. But is it not beneficial to have more levels of certification so as to increase participation in such projects and keep a high level of morale amongst those who are involved in such projects. The standards should be designed such that even if you have more levels of certification the projects would still suffice as scientifically sound.
Anne Shudy Palmer	UW-Madison Center for Sustainability and the Global Environment	6 Aug 2008	CL1.1	I could not find the list of CCBA-approved methodologies for estimating net change in carbon stocks on the web site. I would like to verify that at least one of these methodologies	Make the list of approved carbon stock estimation methodologies more visible on the web site. Verify that biochar projects will be covered by at least one methodology.

				accommodates the soil application of biochar as a carbon sequestration activity. (I looked at section 2.3.3 of IPCC 2006 GL for AFOLU and was unable to determine how soil application of biochar would be quantified. I hope someone with more experience can give an answer on this.)	
Dinguirard	FDI	9 Aug 2008	All	Wonderful work, but no requirements regarding VER issuance and provisioning.	I do propose that offsetters who buy and sell forestry carbon credits should freeze an equal amount of currently available carbon credits (100%), with an unfreeze rate of 10% per year during the ten last years of the project duration, and unfreeze would be possible only if validated by an accredited verifier, that projects risks did not occur and project still CCB approved is (this verification could happen every three or five years). In order not to keep old carbon credits frozen for a long time, offsetters should have the right to replace each year, every one or two years old carbon credit by a current year carbon credit. This provision management could be operated by an independent registry, or an internal but certified registry. Frozen carbon credit should not be sequestration credits, but avoided emissions generated credits. best regards FDI
Alyx Perry	Southern Forests	11 Aug	G3 and	In general we support the development	We suggest the following changes to

	Network	2008	others	<p>of a CCBA standard and feel the standard must represent a meaningful, credible system of criteria and review. We feel the framework proposed does a good job of identifying many of the primary considerations required. However, we feel the draft standard lacks sufficient rigor, and detail to provide a credible evaluation of forest-based carbon projects. Criteria and indicators are broad and fragmented, and do not support the evaluation of landscape-level ecosystem impacts. We are also concerned about creating greater incentives for establishing plantations than for maintaining natural forests. We are very concerned that policies will result in the wrong landowners receiving economic rewards- if the advantage goes to projects based on afforestation or reduced logging in more degraded forests, then we stand to lose the forests that are actually providing the most carbon sequestration (i.e. the “healthy” forests don’t earn credit and get developed). Are we choosing hyper-rigorous standards for additionality so that we can claim that the whole carbon mitigation scheme is credible, while actually REDUCING global carbon sequestration???? We also have the following concerns regarding social and socio-economic</p>	<p>the draft standards: All forest-based projects should be required to obtain and maintain Forest Stewardship Council certification. FSC is the only standard that provides the required rigor and accountability. Re B1: Any use or introduction of GMOs should be prohibited- NO EXCEPTIONS. Any use or introduction of exotic/non-native species should be prohibited-except in cases where shifting climatic zones result in altered conditions requiring a shift in species composition to maintain healthy ecosystems. Shifting land tenure from local to external ownership should be prohibited. Shifting land tenure from community/public ownership or dispersed private ownership to concentrated ownership in the hands of one owner or “group ownership” (such as investment group) should be prohibited. The majority of payments for ecosystem services must remain in the community where land is located.</p>
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				impacts: Are there allowances for project scale/size- is this going to be fair to landowners in general? Is this only beneficial for corporate/group land ownerships or estates of wealthy landowners? Will it require easements? Will it incentivize external ownership of forestlands by corporate interests? Will it allow economic benefits of carbon sequestration to be exported out of local communities?	
Jeffrey Goldis	Equator Environmental, LLC	11 Aug 2008	G2	Equator supports permitting the use "regional-level estimates" at the planning stage of a project. This practice can promote reasonable project development timelines and support crucial project financing.	None
Jeffrey Goldis	Equator Environmental, LLC	11 Aug 2008	G4.6	The ability to demonstrate adequate resources to implement project activities should not be limited to documenting "the financial health of the implementing organization(s)."	Revenues generated through the sale of environmental commodities should be included in the resources considered in demonstrating adequate budgeting for project implementation.
Jeffrey Goldis	Equator Environmental, LLC	11 Aug 2008	G3.8	Stakeholder evaluation of impacts prior to the development of project design is a good concept, but may not be able to be satisfied for projects with activities that are already occurring. Given that there is no, "limit on project start date," standards for meeting this requirement for projects implemented prior to applying for CCB certification are needed.	Provide clarification for projects with activities that were implemented prior to applying for CBB certification.