ACCESS TO OPPORTUNITY: ENABLING SMALLHOLDER AND COMMUNITY PARTICIPATION IN SOCIAL AND ENVIRONMENTAL CERTIFICATION STANDARDS

AN ANALYSIS OF COMMUNITY- AND SMALLHOLDER-TARGETED APPROACHES TAKEN BY CERTIFICATION STANDARDS TO ADDRESS CHALLENGES TO PARTICIPATION THAT AIMS TO INFORM THE DEVELOPMENT OF THE CLIMATE, COMMUNITY AND BIODIVERSITY STANDARDS TO SUPPORT COMMUNITIES AND SMALLHOLDERS TO ACCESS CLIMATE FINANCING FOR LAND-BASED CARBON PROJECTS.
The Rainforest Alliance (RA) works to conserve biodiversity and ensure sustainable livelihoods by transforming land-use practices, business practices and consumer behavior. Based in New York City, with offices throughout the United States and worldwide, the Rainforest Alliance works with people whose livelihoods depend on the land, helping them transform the way they grow food, harvest wood and host travelers. From large multinational corporations to small, community-based cooperatives, the organization involves businesses and consumers worldwide in its efforts to bring responsibly produced goods and services to a global marketplace where the demand for sustainability is growing steadily.

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EXECUTIVE SUMMARY

The Climate, Community & Biodiversity Alliance aims to strengthen the Climate, Community and Biodiversity (CCB) Standards to enhance the ability of communities and smallholders to access climate financing by implementing high-quality carbon projects.

Developed as a resource to help inform this process, this report presents the challenges that community- and smallholder-led projects face in using the CCB Standards; approaches that other leading carbon and social and environmental standards have implemented to address these challenges; and recommendations for improving the CCB standards to better enable smallholder engagement.

Through interviews with standards experts and auditors, and analysis of standards’ documentation, a comparative analysis was conducted for six leading standards: Clean Development Mechanism (CDM), Forest Stewardship Council (FSC), Gold Standard (GS), Plan Vivo, Sustainable Agriculture Network (SAN), and the Verified Carbon Standard (VCS). The main constraints that emerged from this assessment can be grouped into six strongly interlinked categories, namely: cost; smallholding size; technical expertise; project activity characteristics; governance, capacity and market access; and risk.

By examining the processes, contents and format by which these various standards address constraints on community- and smallholder-led projects and considering them in the context of the goals and current implementation realities of the CCB Standards, the following key issues emerge as areas to evaluate when considering revisions or enhancements to the existing CCB Standards system:

A. Identifying the “target group” and how it should benefit them: Deciding which types of projects the CCBA wants to focus on and how it will define those projects, as well as what types of benefits those projects will receive and how those benefits will be generated, is a crucial first step in terms of developing new strategies and considering standards modifications.

B. Modifications to the CCB Standards: When exploring adjustments to the standards a number of approaches obtain relevance, including multi-activity projects and landscape approaches; programmatic approaches, such as grouping, in order to enhance scale-up and potential benefits; and recognizing equitable benefit sharing through enabling projects to demonstrate their accomplishments in that area. CCB’s compatibility with other carbon standards, particularly the CDM, also maintains significance.

C. The Standards’ system: Areas within the CCB standards system that maintain importance for alleviating constraints to smallholders and communities include reducing the costs associated with validation and verification and increasing the tools and guidance needed to carry out these processes, especially with respect to interpreting the CCB standards to benefit project proponents and auditors.

D. Support: There are a number of ways that the CCBA can provide support to smallholder and community led projects. This support may include project marketing to assist community- and smallholder-led projects by promoting them through CCBA media or a designated mark; relieving cost barriers; implementing capacity building activities; and engaging with governments and funding agencies to enhance support of community- and smallholder-led projects.
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<td>Afforestation/reforestation</td>
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<tr>
<td>AFOLU</td>
<td>Agriculture, Forestry and Other Land Use</td>
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<td>BR&amp;D</td>
<td>BioClimate Research and Development</td>
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<td>CCB(A)</td>
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<td>CER</td>
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<td>CMP</td>
<td>Conference of the Parties serving as the meeting of the Parties to the Kyoto Protocol</td>
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INTRODUCTION

The Climate, Community & Biodiversity Alliance aims to strengthen the Climate, Community and Biodiversity (CCB) Standards to enhance the ability of communities and smallholders to access climate finance by implementing high-quality carbon projects. To help with this objective, an analysis of approaches to improve smallholder and community access taken by other certification frameworks was conducted through interviews with standards experts, review of standards’ documentation and consultation with auditors experienced in using the standards. The ideas represented in this study come from the experts, auditors and documentation consulted. Carbon project proponents were not consulted for this review, but their input was sought in a complementary set of case studies examining current smallholder- and community-led carbon projects in Africa.

SCOPE

The foci of this review are:

- The processes employed by other leading social and environmental standards organizations for the development of community- and smallholder-oriented standards, policies and guidance (hereafter referred to as “frameworks”); and,
- The format and content of those frameworks.

COMMUNITY- AND SMALLHOLDER-LED PROJECTS

As per the Climate, Community and Biodiversity Alliance (CCBA)’s CCB Standards for Smallholders Project Summary, smallholder- and community-led projects are activities on lands owned individually by smallholders, or owned collectively by communities, or where smallholders and/or communities have recognized management rights, and where they are actively involved in design and implementation of project activities. Smallholders are households operating a small area of land (compared to the national average) that use no, or limited, hired labor. Since this “target group” may be treated differently than other project proponents or stakeholders, it is recommended that the CCBA review its definition and use of these terms and how they are used as part of its initiative to increase uptake of the standards by communities and smallholders (see “target group” discussion on p. 24 of this document).

STANDARDS REVIEWED

The following standards are reviewed and assessed within this study:

- Clean Development Mechanism (CDM)
- Forest Stewardship Council (FSC)
- Gold Standard (GS)
- Plan Vivo
- Sustainable Agriculture Network (SAN)
- Verified Carbon Standard (VCS)
Although this is not an exhaustive list of carbon standards or standards that certify land management activities, each standard was chosen because it contributes an important element to the overall understanding of enhancing access for communities and smallholders. The Clean Development Mechanism is the most widely used framework for carbon project implementation and it originated the concept of programmes of activities, which is useful for grouping multiple projects and has cost and feasibility implications for smallholders. The Forest Stewardship Council (FCS) and Sustainable Agriculture Network (SAN) represent certification standards at the vanguard of market-based systems to assure consumers that their forest and agricultural products are socially and environmentally sustainable. These organizations had to address the challenges inherent in increasing community and smallholder access to certification prior to many carbon standards needing to do so. Lessons can be learned from their approaches, particularly for the CCB standards, as both FSC and SAN maintain values that are well aligned with the CCBA.

Plan Vivo was designed to enable the participation of smallholders in the carbon market and its system focuses exclusively on those types of projects. The Gold Standard, successful in raising the price of carbon credits in the renewable energy sector, is similar to the CCB Standards in attempting to demonstrate the added value that carbon projects can offer (which in the case of the Gold Standard is “sustainable development” benefits). The VCS is the leading voluntary carbon standard, and has the largest market share for agriculture, forestry and other land use (AFOLU) projects, many of which also use the CCB Standards.

Throughout this document, references are made to other relevant standards or organizations as applicable. Additionally, there are standards not included herein that can provide further insight into enhancing smallholder participation and may also serve as potential avenues for collaboration depending on how the CCBA decides to proceed. The Carbon Fix Standard, for example, acknowledges the CCB Standards’ criteria in replacement of its own set of social and ecological safeguards, and other standards, such as the American Carbon Registry, Social Carbon standard, and the Natural Forest Standard, may be resources for CCBA stakeholders.

1. CHALLENGES OF USING THE CLIMATE, COMMUNITY AND BIODIVERSITY STANDARDS SPECIFIC TO COMMUNITY- AND SMALLHOLDER-LED PROJECTS

Currently there are a number of constraints that make the use of the CCB Standards by community- and smallholder-led projects quite challenging. With respect to agricultural carbon projects in Africa, in particular, a 2010 assessment of the feasibility of an African agricultural carbon facility described the challenges for mobilizing carbon finance at scale and included i) carbon monitoring and measurement; ii) coordinating with smallholder farmers across large landscapes; and iii) limited access to regional technical and financial expertise. The constraints on community- and smallholder-led projects that use the CCB Standards are similar, regardless of the region in which they are developed. This report finds that the overwhelming constraint to such projects is cost, and that costs are generated in at least four project elements: financial and technical expertise and infrastructure; smallholder project complexities; governance, capacity and market access; and risk.

1.1 FINANCIAL AND TECHNICAL CONSTRAINTS

The cost of achieving validation to the CCB Standards for a smallholder project can be divided into two main categories: i) project development and, ii) third-party validation and verification.

Interestingly, the size of a project does not necessarily reduce or increase the cost of implementing a carbon component and seeking certification. The African agricultural carbon report analyzed “Estimated Input Costs & Illustrative Agricultural Sequestration Projects in Kenya” and reached similar conclusions about the relationship between project size and cost:

*Overall, we found that the costs of incorporating a carbon component into an agricultural commodity or sustainable land management project remain relatively constant after reaching a project size of about 200,000 hectares. The minimum size is determined mainly by the minimum amounts of carbon that the project needs to cover, which is about 50,000 tCO₂/year. Operational costs scale with the physical size of the project.*

This finding makes clear that some costs of carbon projects are fixed and cannot be easily reduced, regardless of the project size. On the project development side, those costs include technical assistance and coordination related to silvicultural, agroforestry and/or reforestation practices as well as carbon project risk management. It is often difficult for smallholders and communities involved in those projects to meet these costs, as opposed to large-scale projects with greater potential capital investment. Project auditing (at the validation and verification stages) also requires a minimum level of time and resource commitment by the third-party, as required by the CCBA, which can be disproportionate to a small project’s potential income from carbon credit sales. One potential approach for alleviating this constraint is aggregation and “scaling up” community- and smallholder-led projects in a simplified and flexible manner. Currently under the CCB Standards, however, in order to expand a project, the proponent must prepare a new project design document (PDD) and repeat the validation process all over again.

**PROJECT DEVELOPMENT COSTS AND TECHNICAL REQUIREMENTS:**
The CCB Standards in their current format maintain fairly technical and complex language and requirements. It is normally necessary for a project to bring in a technical specialist to oversee, or at least advise, the development of the PDD. Technical terms such as ‘leakage’, ‘additionality’, and ‘baseline’ necessitate a certain degree of training and guidance from someone who has technical experience with the CCB Standards or AFOLU carbon projects. Generally speaking, an in-country non-governmental organization (NGO) or private company that is coordinating a smallholder project would need to bring in a consultant to assist with technical issues. Frequently, this technical consultant will develop a workplan of activities to be carried out by the in-country team in order to gather the data needed to complete the PDD. The consultant may assist in writing the PDD and analyzing data. The level of complexity needed to develop a PDD that complies with the requirements of the CCB Standards makes this a costly process.

For smallholder and community projects that involve multiple parcels of land and multiple land owners, additional elements of the CCB Standards prove to be even more costly. A complete list of the criteria that are more challenging for these types of projects is provided in section 1.2.

**VALIDATION, VERIFICATION COSTS AND SCALE:**
In addition to the project development costs, there are also validation and verification costs. The CCB Standards require an independent, third-party validation by an approved organization. Validation and verification costs normally have a minimum, fixed threshold due to the fact that there is a minimum fixed cost of reviewing a PDD and carrying out a field audit regardless of whether the project size is 500 hectares or 10,000 hectares. For small
projects, the costs of validation and verification can be prohibitive. At the start of a project, there is often limited funding and it can be difficult to get many smallholders to commit to the project and collectively start project activities at the same time even if they are in agreement with the goals and activities of the project. Smallholder projects are better suited for starting small and growing over time by adding land and smallholders as the project’s model proves successful. The CCB Standards does not currently have provisions for such a model, as the project’s total area and number of participants, or carbon rights holders, must be defined at the project’s validation stage before project activities are implemented. This challenge might be addressed through a ‘programmatic approach’ which other standards such as VCS, CDM, Gold Standard, FSC and SAN have put in place (see sections on these standards below).

Some project developers may see achieving VCS or CDM validation/verification, in addition to earning validation/verification to the CCB Standards, as being necessary since the former allow issuance of emission reductions. Conversely, the market is increasingly ‘requiring’ projects to also achieve validation and verification to the CCB Standards in addition to VCS or CDM to ensure that social and environmental concerns are taken into account when implementing carbon projects. Combining the audit process for multiple standards reduces the cost of auditing the project to each standard separately, but it still increases the cost beyond that which it would be for one standard alone.

1.2 COMPLEXITIES OF SMALLHOLDER PROJECTS

Community- and smallholder-led projects generally deal with a large number of discrete land parcels and/or ownerships. This reality makes community- and smallholder-led projects more burdensome in terms of time and administrative complexities when compared to larger projects, which generally deal with a smaller number of land parcels and owners. Many of these criteria could be interpreted in a way that takes into account the unique facets of smallholder projects, however, at present auditors report that they are challenged by a lack of interpretation guidance.

In the case of smallholder projects under the CCB Standards it is currently necessary to delineate the project boundary of each land holding where the project activities will take place. This delineation has to take into account eligibility criteria, which often involves an assessment of past land use trends. Such analysis often necessitates sophisticated mapping, such as GIS or Remote Sensing, which requires bringing in an outside expert. In addition, smallholder projects need to develop a management structure and legal contracts with individual land owners regarding carbon rights, the commercialization of carbon credits and creation of benefit sharing mechanisms. Such requirements often make community- and smallholder-led projects the most costly to develop, in spite of generating relatively low volumes of carbon credits.

Within the CCB Standards, the following criteria can pose challenges for community- and smallholder-led projects:

- G1.4 – Assessing original carbon stocks in the Project Area. Specifically: the estimation of carbon stocks using Intergovernmental Panel on Climate Change (IPCC) Guidelines or a more robust and detailed methodology.
- G1.8 – Assessing the original biodiversity of the Project Area. Specifically: identifying HCVs, especially if they are unaware of existing guidance, such as that provided by Proforest.
- G2.1 – Baseline Projections. Specifically: describing the most likely baseline for land-use using IPCC 2006 GL for AFOLU or a more detailed methodology and estimating the carbon stock changes associated with

- G4.3 and G4.5 – Worker orientation and training and worker rights. Specifically: these requirements may be overly arduous in the case of a project that involves communities or smallholders, or is being led by one of these groups. Producers working on their own land may not have the resources or time to find guidance in order to improve orientation, training or enforcement of relevant laws and regulations that relate to the project’s activities.

- G4.4 – Equal Opportunities for Employment. Specifically: this requirement might impose practices which are not culturally suitable, for example, if a community has an existing hierarchy which makes it inappropriate or ill-suited for the project to comply with the equal opportunities requirement.

- G5.6 Legal Status and Property Rights – Specifically: it may be difficult to obtain documenting title to the carbon rights, or legal documentation that the project is undertaken on behalf of the carbon owners with their full consent.

- CL1.1, CL1.2, CL1.3 – Net Positive Climate Impacts. Specifically: the methods required for estimating net changes in carbon stocks and, if necessary, non CO2 GHG emissions.

- CL2.1 and CL2.4 – Offsite Climate Impacts (Leakage). Specifically: the methods required for estimating offsite climate impacts, especially where leakage would generate activities that are different than the project activities (i.e. transport).

- CL3 – Climate Impact Monitoring. Specifically: projects might lack technical expertise to develop a monitoring plan sufficient to address all of climate impacts generated by different land parcels or ownerships of the project.

- CM1 – Net Positive Community Impacts. Specifically: carrying out social impact assessment sufficient to capture all of the project’s impacts (an outside entity might be required to see all of the potential impacts objectively).

- CM3 – Community Impact Monitoring. Specifically: carrying out social impact monitoring to objectively document the impacts generated on different land parcels or ownerships of the project.

- B1.1 – Net Positive Biodiversity Impacts. Specifically: carrying out biodiversity impact assessment to assess net Positive Biodiversity Impacts, especially when traditional knowledge might be the only source of biodiversity knowledge.

- B3.1 – Biodiversity Impact Monitoring. Specifically: carrying out biodiversity impact monitoring to document the impacts generated on different land parcels or ownerships of the project.

Due to the diverse ways that communities and smallholders use their lands and the aggregation of parcels and ownerships that are typically involved in carbon projects they organize, community- and smallholder-led projects are often well suited for incorporating multiple GHG sequestration or emissions reduction activities, such as combining reforestation with improved forest management and agriculture. Projects that use the VCS or CDM methodologies in order to meet the CCB Standards (as many do) must use a separate baseline for each activity, which is especially challenging for community- and smallholder-led projects where individual activities are small in terms of in land use and/or emissions reductions. This can often mean that smallholder projects might be validated/verified to the Standards and earn carbon credits for only one of their project activities, even though they might in reality be better suited to ‘multi activity’ projects. See section 3.2 B1 for further discussion of this issue.
1.3 GOVERNANCE, CAPACITY AND MARKET ACCESS

In order to achieve validation and verification under the CCB Standards, projects often need a coordinating entity distinct from the smallholders themselves. This is normally a small to medium sized organization that assists with coordinating the project’s design, implementation of project activities, budgetary management, negotiations with carbon buyers and distribution of carbon benefits to the smallholders over the lifetime of the project. Smallholder projects in this sense are reliant on the coordinating organization, and their knowledge and access to carbon markets may be entirely linked to being in contact with such an entity operating within their region. Given the credibility requirements of the voluntary carbon market, it is not feasible for an individual smallholder to develop a project alone. Aggregation is needed with other smallholders to reach a minimum size threshold in order to make the costs of pursuing the CCB Standards validation and verification processes worthwhile. Whilst communities or smallholders could coordinate this aggregation themselves, it seems more common, because of capacity issues, for them to work with an intermediary organization. The efficiency of the project and the way it is managed in the future is very dependent on the intermediary coordinating entity. The level of participation, control, and management by a community or smallholders in the project can vary largely, and is currently unregulated by the CCB Standards. If the Standards are adapted to target the participation of communities and smallholders or to increase the benefits those groups earn through involvement in projects that meet the Standards, the level and means of participation of communities and smallholders should be clearly defined.

Smallholder projects may also have problems accessing the market. Whilst the prospect of generating carbon offsets might be very appealing and appropriate in a given area, the reality of accessing the information necessary to develop the project to the level needed for validation and verification and then to market the credits is challenging. For new actors in the forest carbon market, such as intermediary NGOs coordinating a potential smallholder carbon project, it can be very difficult to know which carbon accounting standard to choose as there are a range of different standards which all offer benefits and drawbacks. With the carbon market still in its infancy, especially for AFOLU credits, there is considerable market uncertainty and lack of market knowledge. Price variability is high, especially for small scale projects. While community- and smallholder-led projects have the advantage of selling “charismatic carbon” – credits that have strong social and environmental stories attached to their production and potential impact, marketing a smallholder project and finding suitable buyers can be extremely challenging. Regardless of their proponents, carbon projects need investments at many different points in their development and much support is needed prior to the point at which credits are fully verified and registered (if a registration system is used), so often projects must solicit commitments from credit buyers before their product, the carbon credit, has earned its best price. It can be difficult for projects to connect with investors who are interested in their activities and/or credits when they need funding the most, regardless of when that time comes for their particular project.

1.4 RISK

Smallholder projects may be perceived by some buyers and investors as being “higher risk”. This may or may not be the case, but certainly aggregating a large number of individuals (smallholders) into one project increases the complexity of ensuring carbon rights and permanence. It is possible that a participatory project development approach with the smallholder farmers could reduce project risk.
2. STANDARDS ORGANIZATIONS AND EXISTING PROCESSES FOR SMALLHOLDERS AND COMMUNITIES

The Climate, Community and Biodiversity Standard shares principles and values with standards that have already developed frameworks to address the needs of community- and smallholder-led projects. These standards are assessed in greater detail in the following section. A full list of relevant standard and policy documents are referenced in Annex 1.

2.1 CLEAN DEVELOPMENT MECHANISM

The Clean Development Mechanism (CDM) is one of the three flexible mechanisms for carbon project development and crediting under the Kyoto Protocol. It allows entities from Annex I (developed) countries to develop emission-reducing projects in non-Annex I (developing) countries, and generate tradable credits corresponding to the volume of emission reductions achieved by that project. The CDM is regulated under the Kyoto Protocol, which sets binding emissions targets for developed signatory countries. The CDM has the dual aim of reducing emissions and contributing to sustainable development in developing countries.

2.1A DEVELOPMENT PROCESS

The CDM sets out its own standard procedures for assuring the quality of projects and clearly defines the main elements of the seven-stage project cycle from concept to implementation phase. CDM standard procedures include requirements for key documents (such as a letter of approval from the host country government for the project to go ahead) and standard processes used in the establishment of projects (such as third party verifiers accredited by the CDM Executive Board and a formal process of approval for project methodologies). The Project Design Document (PDD) requires that environmental and social impacts of projects are assessed and that any remedial measures are described. The decision as to whether a project activity contributes to sustainable development is left to the host country in the interests of maintaining sovereignty.

Currently, under the Kyoto Protocol, project activities in forestry are only partially included in the CDM under the current rules allowing only reforestation/afforestation (A/R) projects to generate certified emission reductions (CERs). Carbon credits generated from reduced emissions from avoided deforestation and degradation (REDD) are currently excluded from the CDM.

2.1B FRAMEWORK ELEMENTS

SMALL SCALE MODALITIES

Projects registered as small-scale CDM projects are entitled to use the simplified modalities and procedures for small-scale CDM project activities set out in the Annex to 6/CMP.1 (FCCC/KP/CMP/2005/8/Add.1). Small-scale modalities have potential benefits for smallholder and community-led projects because they allow for the use of simplified methods that include bundling, reduced requirements for the project design document, simplification of baseline methodologies, simplification of monitoring plans, and allowing the same auditor to undertake validation.
as well as verification and certification (as detailed on p. 82 of FCCC/KP/CMP/2005/8/Add.1). In order to use these simplified modalities and procedures, a project activity must meet the following eligibility requirements:

"SMALL-SCALE AFFORESTATION AND REFORESTATION PROJECT ACTIVITIES UNDER THE CDM" are those that are expected to result in net anthropogenic greenhouse gas removals by sinks of less than 16 kilotonnes of CO₂ per year and are developed or implemented by low-income communities and individuals as determined by the host Party (9/CMP.3).

Simplified Methods and Procedures for Small-Scale CDM:

In order to reduce transaction costs modalities and procedures are simplified for small-scale CDM project activities, as follows:

- Project activities may be bundled or portfolio bundled at the following stages in the project cycle: the project design document, validation, registration, monitoring, verification and certification. The size of the total bundle should not exceed the limits stipulated in paragraph 6 (c) of decision 17/CP.7;

- The requirements for the project design document are reduced;

- Baseline methodologies by project category are simplified to reduce the cost of developing a project baseline;

- Monitoring plans are simplified, including simplified monitoring requirements, to reduce monitoring costs;

- The same operational entity may undertake validation, and verification and certification (4/CMP.1, Annex II, paragraph 9).

BUNDLING

The advantage of bundling is that bundled projects can obtain a single validation report and a single certification report for the entire bundle, which streamlines these processes for project participants.

Several small-scale afforestation or reforestation project activities under the CDM may be bundled for the purpose of validation. An overall monitoring plan that monitors performance of the constituent project activities on a sample basis may be proposed for bundled project activities. If bundled project activities are registered with an overall monitoring plan, this monitoring plan shall be implemented and each verification/certification of the net anthropogenic removals by sinks achieved shall cover all of the bundled project activities (6/CMP.1, Annex, paragraph 11).

PROGRAMME OF ACTIVITIES

In an effort to reduce transaction costs in the CDM and expand the mechanism’s applicability to small project activities, the CDM Executive Board launched the Programme of Activities (PoA) modality. The development of a PoA is specifically orientated to replicability and scaleability. It is seen by some as the first step in moving towards a sectoral approach for reducing greenhouse gas (GHG) emissions and is also considered the CDM tool for
implementing government policies. Unlike stand-alone CDM projects, once the PoA has been set up and granted approval, it does not need to define the scale and location of each project activity “ex-ante”, or before certification. As opposed to a bundle of projects, a PoA can continuously add an unlimited and unspecified number of individual projects without recourse to the CDM Executive Board. New project activities do not need to pay registration fees or be validated as they join the programme. As a result, new projects using the PoA should take less time to get carbon credits to market with reduced risk, lower transaction costs and full scalability. Certification occurs every five years after verification and all project activities are eligible to issue credits dating from the certified project activity (CPA)’s inclusion in the programme.

STANDARDIZED BASELINE

The "STANDARDIZED BASELINE" FOR A CDM PROJECT ACTIVITY is defined in -/CMP.6, paragraph 44 as:

A baseline established for a Party or a group of Parties to facilitate the calculation of emission reduction and removals and/or the determination of additionality for clean development mechanism project activities, while providing assistance for ensuring environmental integrity (-/CMP.6, paragraph 44).

A standardized baseline is not calculated on a project-by-project basis, but is a single, standard estimation of the greenhouse gases that would have been emitted if certain types of CDM projects were not implemented. To establish a standardized baseline applicable to a new or existing methodology, countries, project participants, international industry organizations and admitted United Nations observer organizations submit proposals for consideration by the CDM.

The aim of standardizing baselines is to reduce the time and costs associated with designing CDM projects and preparing the PDD. Currently there are no standardized baselines for the CDM in the A/R category. However, this could be a very useful mechanism to help reduce project development costs for smallholder farmers.

2.1C OUTSTANDING CHALLENGES

The CDM process remains fairly complex, despite its small scale provisions. Demanding ‘standards’ in relation to carbon accounting) may be desirable, and could potentially include adding the requirements of field work to check validity of default biomass data, delineation of project boundaries, and documented proof of ‘rights’ to the carbon. However, due to the fact that these activities lead to higher costs, this often excludes small-scale producers from the marketplace. The cost of developing small-scale CDM projects (including project design, impact assessment and registration), for example, is estimated by the United Nations Development Programme (UNDP) to be between US$40,000 to US$90,000.

Currently for AFOLU the CDM is limited to A/R project activities. Whilst A/R is certainly a relevant project activity for smallholders, often ‘multiactivity’ projects would be more appropriate; however CERs can only be gained for the reforestation activities within relatively narrow eligibility criteria.

Whilst the PoA is a useful mechanism for smallholder farmers, the CDM process still requires a separate PoA design document (DD) and CPA design document (CPA-DD) at validation. Each CPA inclusion requires a new CPA-DD and the production of such documents is time-consuming and costly. The PoA mechanism also has some issues
related to scalability currently under the A/R rules. Small scale projects are subject to debundling rules under CDM which limit other small scale projects from being within 1km. This could limit the locations for PoA activities where small-scale modalities are used.

The future of the CDM and demand for CERs remains uncertain. The only buyers of AFOLU credits are the BioCarbon Fund and some European Union governments, such as Norway and Sweden, however most often governments support flexible mechanisms rather than purchasing credits for compliance purposes. Without post-2012 targets, there is no way of gauging what demand there might be for tCERs, the temporary CERs issued from A/R projects, all of which expire at the end of the commitment period in which they are issued.

2.2 FOREST STEWARDSHIP COUNCIL

Founded in 1993, the Forest Stewardship Council (FSC) facilitates the development of standards, ensures monitoring of certified operations and protects the FSC trademark so consumers can choose products that come from well managed forests that provide environmental, social and economic benefits. The standard is based on 10 principles and corresponding criteria that are adapted to the specific conditions and contexts of each country or region through the development of regional and national standards. Each national standard is managed by a FSC-accredited national initiative – that country’s “chapter” of the FSC. There are two types of certification: forest management and chain of custody.

2.2A DEVELOPMENT PROCESS

The FSC is a non-profit organization governed by representatives from environmental and social organizations as well as businesses. Standards and policy decisions originate from membership motions passed at the organization’s General Assembly or through the Board of Directors. They are then developed by a specialized unit of FSC International, in collaboration with a working group that is created specifically for that standard/policy development process. These working groups are often composed of a balanced arrangement of representatives of the FSC’s environmental, social and economic chambers. Public stakeholder consultation is carried out on the first public draft and as needed on following versions before the working group is ready to recommend a final draft and seek approval from the Board of Directors. FSC follows the ISEAL Alliance Code of Good Practice for Setting Social and Environmental Standards.

The FSC has been working to address social issues since it was founded and understands the challenges that smallholders and communities face. Certifiers, stakeholders, and clients have raised concerns about how to increase access of small and non-industrialized landowners, especially ‘family owned’ forests in the North and community and smallholder forests of the South, since the organization was founded. FSC strategic plans have put focus on social equity and access for over a decade, and it has utilized working groups on smallholders for nearly as long. In the past year, FSC International has further dedicated its business development staff, who complement the work of FSC’s policy staff, to working exclusively on smallholder issues. As a result, FSC has been able to take action on the mandate given to them by members’ and stakeholders’ to highlight the benefits of certification to smallholders and communities and to increase the benefits to those groups of certification.

Development of new standards elements – including country-specific standards – is often driven (and supported by funds raised) by NGOs. The different standards and certification approaches that make FSC certification more
accessible to smallholders evolved over time through different mechanisms. It is interesting to note that FSC is now working more with uncertified forest managers than ever before (through step-wise approaches to certification and a smallholder fund – see “framework elements,” below).

### 2.2B FRAMEWORK ELEMENTS

#### CERTIFICATION OPTIONS

The FSC identifies several options for certification for smallholders: Small and Low-Intensity Managed Forests (SLIMF) certification, group certification and a Modular Approach Program.

**Small and Low-Intensity Managed Forests (SLIMF) certification**

Entities that qualify as SLIMFs are eligible for reduced sampling based on an assumption that they are lower risk than larger operations.

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**FSC DEFINITION OF SMALL FOREST MANAGEMENT UNIT (FSC-STD-01-003, v.1)**

Forest management units may be classed as SLIMF units when they are 100 ha. or smaller in area or when they meet the requirements specified...below.

Forest Management Units of up to 1000 ha. in area may be classed as SLIMF units when this is formally proposed by the FSC-accredited national initiative for the country concerned, or in countries in which there is no FSC-accredited national initiative when this has the demonstrated broad support of national stakeholders in the country concerned. Classifications proposed by certification bodies shall be superseded by any subsequent classification approved by the FSC-accredited national initiative for the country concerned.

FSC-STD-01-003 SLIMF Eligibility Criteria - addendum provides the definitive list of countries for which the definition of ‘small’ is larger than 100 ha.

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**FSC DEFINITION OF LOW-INTENSITY FOREST MANAGEMENT UNIT (FSC-STD-01-003, v.1)**

Forest management units (FMUs) may be classed as SLIMF units when:

a) The rate of harvesting is less than 20% of the mean annual increment within the total production forest area of the unit, AND

b) EITHER the annual harvest from the total production forest area is less than 5000 cubic meters,

c) OR the average annual harvest from the total production forest is less than 5000 m³/year during the period of validity of the certificate as verified by harvest reports and surveillance audits.
Forest management units from which non-timber forest products (NTFPs) are collected or harvested shall be evaluated as 'low intensity' on the basis of the timber harvest rate. A forest management unit consisting of natural forest in which only NTFPs are harvested would, therefore, qualify as a 'low intensity' FMU. Plantations of non-timber forest products (e.g. oil palm plantations, cocoa plantations) shall not be considered low intensity forest management units within the meaning of this standard.

FSC-accredited national initiatives may develop additional criteria, and/or specify a lower threshold to define 'low intensity' more appropriately for their region. *FSC-STD-01-003 SLIMF Eligibility Criteria - addendum* provides the definitive list of countries for which the definition of 'low intensity' differs from that defined above.

FSC policy is modified to accommodate SLIMFs in the following ways.

- Streamlined certification procedures: This entails a series of modifications to the way certification bodies carry out initial certification assessments and annual monitoring for SLIMF operations. Among other elements, SLIMF requirements differ in that they i) do not have a scoping requirement but maintain modified stakeholder consultation requirements, ii) maintain modified requirements regarding the evaluation of groups, iii) allow a shorter list of required information and a “checklist” submission format for the certification report, and iv) allow some surveillance audits to be desk based.

- Guidance for FSC forest stewardship standards development: This guidance supports the development of forest certification standards that take into account the realities of small and low intensity forest use and management.

Brazil has a new, country-specific SLIMF standard that allows the certification of plantations under the SLIMF program. The FSC predicts that more country-specific SLIMF standards will emerge in the near future.

**GROUP CERTIFICATION**

The FSC group certification provision allows a group of forest owners to join together under a single FSC certificate. This has potential benefits for smallholder and community groups because it allows them to share and distribute the costs of certification amongst the entire group, which can dramatically reduce the cost for each forest owner. FSC does not limit the number of group members, but the group has to be managed effectively and function according to FSC rules. A designated group manager must be in place to support the group’s members, supervise planning, and monitor management practices of the members. The FSC certification body audits the group manager and a sample of group members at each visit. A summary is provided in PROFOREST and WWF’s Group Certification Briefing Note 1. An example of the scaling power of a group certificate is that which was awarded to over 41,000 parcels enrolled in the US state of Wisconsin’s Managed Forest Law Program in 2008. The certificate covered nearly 810,000 hectares of non-industrial private (family) forests.

**MODULAR APPROACH PROGRAM (MAP)**

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The FSC MAP approach provides recognition for achieving steps needed prior to obtaining FSC certification, allowing forest managers to demonstrate their progress towards improved forest management and full certification. Such an approach may be beneficial to smallholders and communities because it allows them to progress slowly and effectively over time. Modular certification also creates an effective link between demonstrating legal compliance, controlled wood and compliance with the full FSC Principles and Criteria. FSC International’s MAP standard is now being finalized. It is described in its draft form in the document FSC Standard for forest management enterprises participating in the FSC Modular Approach Program (MAP). From this document, it is evident that a major focus of the MAP is increasing entrepreneurial capacity. Forest managers in particular are encouraged to identify the key market opportunities for all products and services that their forest unit can sustainably produce at each stage of improvement toward and beyond certification. The steps in the MAP are as follows:

1. Compliance with FSC Principle 1 (Legality)
2. Compliance with FSC Controlled Wood requirement
3. Compliance with the FSC Forest Stewardship standards

Until successful completion of Step 3 (full FSC certification) the forest management enterprise cannot make any public claims associated with FSC (use of trademarks), though it may use claims as outlined in the draft standard that acknowledge which “step” they are at.

NATIONAL STANDARDS

National standards have been part of the FSC’s structure since it began as a way to localize the principles and criteria. As a result, some countries have specific ways of making things easier for smallholders and communities that are based in local legislation.

U.S. EXAMPLE: FAMILY FOREST INDICATORS

In order to increase certification of family forest ownerships less than 2,500 acres (6177.63 ha) in size, FSC-US developed a set of family forest indicators for its July 2010 standard. The number of indicators that auditors need to look at on family forest lands is reduced about 20 percent because the risk of negative social or environmental impact is generally considered low. Additionally, group managers can address many of the requirements at the group level, including resource assessments and monitoring. According to the FSC, the net effect is a significantly reduced cost of certification for small landowners, especially when enrolled in group programs. Following the release of these new indicators, auditors at the Rainforest Alliance have seen a major increase in certifications of these family forests. This increase was also influenced by increasing market demand for certified product.

The family forest indicators have been successful in part due to the consolidation of tens of management criteria into a single criterion that relies on US state government regulation. Country-specific rules might not provide significant lessons learned for the CCB Standards on a global level, but they should be considered if the CCBA decides to develop any kind of regional or local indicators.

INSTITUTIONAL SUPPORT FOR SMALLHOLDER ISSUES

In addition to specialized certification options, the FSC has dedicated staff at its international headquarters to managing marketing and other support for increasing the impact of certification for smallholders, including
supporting the FSC’s policy staff. FCS also provides support and opportunities for smallholders and communities through its emerging smallholder fund, labeling options, and the FSC marketplace.

**Smallholder Fund**

As of 2012, the FSC is in the process of developing a “Smallholder Fund”, which will support the efforts of SLIMF, or community certificate aspirants or holders, to become FSC certified, maintain certification, and access benefits that accompany certification. The fund will be managed by a chamber-balanced advisory board and one staff person. It is funded by a dedicated percentage of administrative certification fees (i.e. the licensing fee) and average grants are estimated at ~US$30k.

The FSC has also formed partnerships with financing organizations, including the Financial Alliance for Sustainable Trade (FAST), the Borneo Initiative and the Amazon Alternative, to increase funding opportunities for small- and medium-sized enterprises (SMEs) that want to get certified.

**Smallholders and Community Label Option**

The FSC’s principles and criteria have a strong social focus in addition to their environmental and management elements. However, in comparison to the environmental benefits, the social components of certification have not received much attention. The FSC sees its new smallholder and community label as one way to change this trend and highlight the positive social impacts of certification. In addition, the FSC has found that consumers really want to hear the story of the product person-to-person.

FSC originally decided that forest products qualifying for the smallholder and community labeling scheme should be limited to those from communities in the global south, but after much discussion – and realization of the need to have a sufficient volume to earn market recognition for the label – the geographic restriction was lifted. Alternatively, the definition of community was limited to traditional or indigenous peoples and SLIMFs were included. The current advice note suggests that all products that are 100% from forest management certificate holders that meet SLIMF criteria, or those that originate from indigenous or traditional community producers may use the new label, as well as participate in a marketing campaign and earn FSC marketing support such as assistance creating supply chain linkages.

The advice note Labeling Products from Small and Community Producers introduced this option for use in January 2012; the FSC’s Policy Coordinator will monitor experiences with the use of the new label text with producers and retailers over the following year, and decide if revisions to the policy are necessary. As it is new, the FSC does not yet know the market response to the label.

**FSC Marketplace**

The FSC Marketplace is an online platform designed to bring buyers and sellers of FSC certified products in the FSC supply chain together. It is open to all buyers and sellers of FSC-certified products, and provides a specific opportunity for certified entities to share information about their available products. The connections it provides may be particularly beneficial to smallholders that would not otherwise have significant marketing opportunities.

**2.2C Outstanding Challenges**
The FSC maintains that it is important to recognize when land-use or resource conservation/management issues are beyond the scope of ability for standards organizations to address and in these instances, it is beneficial to enlist or rely on partners or other mechanisms to address challenges. FSC calls these “external drivers”. An example of such a driver is illegal logging, in which case FSC relies on processes like the European Union’s Forest Law Enforcement, Governance and Trade (FLEGT) Action Plan and the United States’ Lacey Act to help change governance practices and encourage legal activities, which are the foundation of certification.

Domestic and international markets pose another major challenge for increasing certification of smallholders since they often contain an abundant supply of inexpensive and uncertified timber, and there is no price premium for certified product. FSC has partnered with Fair Trade to work on increasing price premiums for certification in these markets.

Through surveys of communities and smallholders, FSC found that the biggest challenges of certification for them are the cost of coming into compliance, the cost of the audit, and accessing the standard in a local language. The FSC has found that when translated into local languages and, most importantly, into a language that is sympathetic to the forest managers, concepts such as high conservation values are easier for smallholders and communities to understand and engage with. However, maintaining the standards in a variety of languages remains a challenging task for the FSC.

### 2.3 GOLD STANDARD

The Gold Standard is a certification that is used in both the voluntary and compliance carbon markets. To meet the Gold Standard, projects must adhere to strict standards on additionality and demonstrate positive impacts on the economy, health, welfare and environment of the local community hosting the project. The certification process also requires the involvement of local stakeholders and NGOs.

All Gold Standard projects must use either methodologies approved by the CDM Executive Board that meet its scope and specific eligibility criteria or Gold Standard VER methodologies. The Gold Standard currently includes renewable energy supply, end-use energy efficiency improvement, and waste handling and disposal projects. In 2012 the Gold Standard Foundation announced that it plans to expand its scope with the aim of creating i) a ‘land-use and forestry Gold Standard’ that provides credible carbon accounting, ii) a holistic approach for providing safeguards and monitoring, reporting, and verification for co-benefits, iii) multiple combinations of activities, scale, longevity and recognition of the value of non-carbon attributes.

### 2.3A DEVELOPMENT PROCESS

The Gold Standard’s criteria are developed by the Secretariat, overseen by an independent Technical Advisory Committee and validated and verified by a United Nations-accredited Designated Operational Entity, Independent Accredited Entity or, in micro-scale projects, an internal evaluation by the Gold Standard. Its large and small-scale activity classifications and use of the program of activity framework is based on its reliance on CDM methodologies. In 2003, application of the Gold Standard was extended to voluntary market projects. At that time, in recognition of the high transaction costs faced by very small projects under the CDM, the micro-scale scheme was launched. The micro-programme scheme was developed only recently by combining the micro-scale activity rules with those of a programme of activities.
In order to ensure that new mechanisms will be successful, the GS Foundation conducts preliminary assessments to determine risks. The Foundation then drafts the standards, which are reviewed by a technical advisory committee, as well as during workshops with stakeholders and via an online comment period before being finalized.

Establishing different additionality for micro-scale projects was a much-discussed topic in the development of rules for those projects. Similarly, the definition of which projects qualified under the micro scheme was debated; it was originally set at 5,000 tCO₂ equivalent per crediting period year but was revised to 10,000 based on feedback from project proponents in the 5,001-10,000 range who felt they faced the same challenges as those under the original limit.

2.3B FRAMEWORK ELEMENTS

The Gold Standard has no accommodations specifically for community- or smallholder-led projects. Its consultation process is very prescriptive and ensures that each project includes a two-part “Local Stakeholder Consultation” to ensure there are no negative impacts generated from the project and, that where possible the project results in positive impacts for local communities. Some challenges of this approach are that extensive consultation results in increased cost of compliance for the project proponent, and there is no clear definition of what constitutes a “community” within the GS system.

In its efforts to improve access to the CCB Standards, the CCBA can learn most from the GS’ efforts to enable certification of “micro” scale projects, including those grouped together in a program. Micro-scale projects and programmes are limited to voluntary emissions reductions efforts.

GOLD STANDARD DEFINITION OF MICRO-SCALE PROJECT ACTIVITIES (GS v.2.2 Annex T)

Projects are eligible under the micro-scale scheme if the annual emission reductions achieved are limited to a maximum of 10,000 tCO₂e in each and every year of the crediting period.

Micro-scale activities may be grouped into programmes, as long as the entire annual emissions is less than or equal to 10,000 tCO₂e. Micro-scale projects and programmes experience streamlined procedures and requirements for the project passport, additionality and validation and verification.

The introduction of micro-scale projects led to strong participation in the GS system by qualifying projects. Many micro-scale projects go through the project registration and validation and verification processes more quickly than projects that do not use the micro-scale rules. It remains to be seen how successful the micro programme activities will be, but initial interest is high.

SIMPLIFIED PROJECT PASSPORT

The project passport provides all information that the GS requires that is additional to the project’s design document. Micro projects and programmes use the simplified project passport, a streamlined passport template that walks them through the micro project/programme requirements as the normal passport template does for all other projects.
**ADDITIONALITY**

Additionality requirements are different for micro-scale and micro programme projects than for others under the Gold Standard: at the micro scale, any project located in least developed countries (LDCs), land-locked developing countries (LLDCs) and small island developing states (SIDS) are by default considered additional. Similarly, any project that will benefit poor communities is deemed additional, however there is no clear definition on what constitutes a poor community. While these definitions do not directly refer to community- and smallholder-led projects, many community- and smallholder-led projects would likely qualify under these definitions of additionality.

**INTERNAL VALIDATION AND VERIFICATION**

Micro projects and programmes may choose to pay a set fee to the Gold Standard Foundation instead of hiring their own auditor\(^3\). The Gold Standard Foundation receives the project manager’s self-appraisal reports and may appoint a designated operational entity or objective observer (an impartial local or regional expert) to conduct site visits to complement the Foundation’s desk review. According to the Gold Standard, the Internal Validation and Verification process has been highly successful in reducing audit cost and providing cost certainty to projects while at the same time covering the Foundation’s costs in managing the audit process.

**CARBON ACCOUNTING METHODOLOGIES**

Micro projects and programmes are encouraged to submit streamlined, conservative methodologies for carbon accounting in their projects. The GS Foundation retains the right to require external assessment of the project/programme’s methodology; when external assessment occurs the project/programme bears the cost.

When the GS Foundation becomes aware of a market-wide methodology need, the Foundation looks for funding and develops a new methodology themselves.

**CAPACITY BUILDING**

The Gold Standard Foundation invests heavily in capacity building. It hosts regional workshops that are not specifically directed at micro-scale projects, but have lately been highlighting micro programmes because they’re new. These workshops serve to help project proponents find their way through GS materials, criteria and overall process and are largely funded by the German Ministry of the Environment through a grant to increase participation of projects in underrepresented regions of the carbon market.

**2.3C OUTSTANDING CHALLENGES**

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\(^3\) As per the Gold Standard’s Standalone Micro-Scheme Rules, for validation the fee is USD 5,000 for activities with emission reductions capped at 5,000 tCo2 per year and USD10,000 otherwise. Internal verification is initiated when a fee of USD2,500 per year is paid to the Gold Standard Verification Fund.
Guidance Development is an ongoing goal of the GS Foundation with respect to improving use of the Standard by micro projects and programmes. They are currently developing guidance on how to assess and monitor sustainable development indicators while leaving enough room for projects to implement bottom-up procedures.

In the same vein, the GS Foundation wants to build a tool that “delivers” the methodology to the project proponent so that all they only need to input information and the tool outputs the appropriate description.

The GS Foundation is developing simplified methods for calculating project baselines and the development of streamlined methodologies is ongoing, dependent on funding resources.

As the GS Foundation expands its scope into land use, it also plans to explore implementing group certification.

The Gold Standard does not define what a project developer’s business model should be, and as a result many stakeholders are concerned that it is not prescriptive enough on how carbon revenues are distributed. The GS Foundation’s position is that their Local Stakeholder Consultation process ensures fair delivery of benefits regardless of which stakeholders do or do not have stakes in the project.

### 2.4 PLAN VIVO

The Plan Vivo Standards are part of a broader Plan Vivo System, which is a framework for community-based, land-use projects that implement activities to help fight and adapt to climate change, provide economic support to locals, and conserve and restore local ecosystems. Project participants are smallholders and communities in developing countries, whose activities are aggregated by a local coordinating organization. They create sustainable land-management plans, called “Plan Vivos”, by combining existing land-uses with additional project activities to generate quantifiable ecosystem services. The standard’s aims are to sustainably and economically sequester carbon in a socially and environmentally friendly manner. Additional objectives include: i) assisting farmers, ii) maintaining projects, and iii) promoting sustainable small-scale management systems in developing countries.

There are currently five fully operational Plan Vivo projects in Mexico, Uganda, Mozambique, Tanzania and Nicaragua and several upcoming projects in developing countries, such as Malawi, Cameroon, Ethiopia, and Nepal. Plan Vivo maintains a listing of projects on its website and lists credits (a.k.a. Plan Vivo Certificates) on the Markit Environmental Registry.

### 2.4A DEVELOPMENT PROCESS

The Plan Vivo System was first conceived and developed in 1994, as part of a UK Department for International Development (DFID)-funded research project in the Chiapas region of Southern Mexico. The development of the project was led by the Edinburgh Centre for Carbon Management (ECCM), in partnership with El Colegio de la Frontera Sur (ECOSUR), the University of Edinburgh and other local organizations. The initial project, Scolel Te, is the longest standing Plan Vivo project, and continues to the current day. In 2002, development and governance of Plan Vivo was transferred from ECCM to an independent not-for-profit organization called BioClimate Research and Development (BR&D), which was dissolved in 2008 when its activities and remit were wholly transferred to the Plan Vivo Foundation, a registered charity in Scotland. The Plan Vivo will soon release the 3rd version of the Standard, which will go through a public comment period before being finalized.
In contrast to the other standards reviewed in this document, the Plan Vivo Standard is specifically focused on smallholders, and has been developed with them in mind as the target user. The definition of "small-holding" and "producer" used by the Standard are described below and are based off the definitions used in the Fair Trade Standard.

**PLAN VIVO DEFINITION OF 'SMALL-HOLDING'**

Land where owner or tenant manages the area largely using his or her own labour or that of their family i.e. there is no structural dependence on permanent hired labour.

**PLAN VIVO DEFINITION OF 'PRODUCER'**

Small-scale farmers, forest dwellers and land-users in developing countries with recognized land tenure or user rights who are part of or have formed organisations and groups such as cooperatives, associations, community-based organisations or other organisational forms. Producers must have a registered Plan Vivo for their own piece of land or be part of a group with a Plan Vivo for a piece of community-owned or managed land. Producers should not be structurally dependent on permanent hired labour, and should manage their land mainly with their own and their family’s labour force.

### 2.4B FRAMEWORK ELEMENTS

**‘PLAN VIVOS’: LONG-TERM PLANS FOR LAND MANAGEMENT**

A key part of the Plan Vivo standard is that each producer has to draw up their own ‘Plan Vivo’ which is essentially a hand written land management plan, which producers themselves have to create to plan how their land will be used as part of the project. This has to be drawn up in the project region’s local language or pictorially. As part of this process, each individual smallholder gains a clear understanding of what targets they must meet each year..

The Plan Vivos also incorporate carbon sequestration or emission reduction activities which are funded by selling VERs in the form of Plan Vivo Certificates and in filling out their management plans, smallholders also get a sense of the payments and benefits they will receive as a result of participating in the project. This level of direct planning involvement with the producers ensures that they engage in project design in a participatory manner. This sets the stage for community-led engagement and participatory project development.

### LOWER COST

**Certification Process**

Plan Vivo describes their certification process as being able to take place under ‘one banner’, where the Plan Vivo Foundation is closely involved in all steps. The certification process is managed by the Plan Vivo Foundation from start to finish, and the process involves not only the certification element, but also assistance and advice on the Standard. The Plan Vivo Foundation themselves manage the process from approval of the Project Idea Note (PIN), to approval of a technical specification (i.e. a project specific method), to validation and ultimately registration. Expert reviewers and third party validators are used, but these are often coordinators from other Plan Vivo Foundation.
projects or members of the technical advisory board, and are appointed in consultation with the Plan Vivo Foundation. The Plan Vivo Foundation themselves issues Plan Vivo Certificates. Plan Vivo is able to keep costs down in comparison to other standards because they draw heavily on assistance and review from their own staff, as well as from the Technical Advisory Committee who largely provide review pro-bono, or at a minimal cost. Keeping costs low means that small projects (e.g. just 20 hectares) are able to go through the certification process and then scale up with time. It is questionable how scalable this model is however, especially given that reviewers and third-party validators often receive wages that are below market rate.

**STANDARD CRITERIA AND REQUIREMENTS**

The Plan Vivo standard is not as rigorous as the CCB Standards in relation to some of the criteria, for example in relation to developing the baseline, the carbon model and monitoring. The technical requirements of Plan Vivo are generally easy to follow and written in simplified language. This may reduce the need to bring in specialist consultants or partner organizations, and means the Standard can be more easily applied by the project coordinators themselves in developing countries. An example would be land tenure documentation, as Plan Vivo doesn’t require a title document from central government and is better at recognizing customary rights. The carbon quantification and monitoring requirements are considerably less onerous than other carbon standards on many levels (from boundaries, to mapping and use of default values) which reduce the workload and the rigor of the standard. This may make Plan Vivo projects less costly to develop, and more accessible to smallholders.

**PROJECT EXPANSION FOLLOWING VALIDATION**

The Plan Vivo Standard allows for additional producers and land to be added and included in the project even after it has been validated, and projects do not need to go through a new validation process following these changes. In the ‘Technical Specification’ component, each project lays out its ‘eligibility parameters’ and so long as the project meets these criteria, it can expand its activities to new land with new producers. A verification and site visit takes place every 5 years that takes into account any new additions to the project.

**PROJECT COORDINATION**

Plan Vivo projects must be coordinated by a non-governmental entity, which is referred to as the ‘project coordinator’ within the Standard. This entity helps ensure that smallholders’ interests are represented and that any generated revenue or funds are distributed to the farmers fairly and through-out the course of the project’s lifetime. The eligibility criteria for the ‘project coordinator’ are as follows:

- Existing local or national environmental non-governmental organizations (NGOs);
- Independent trust funds or not-for-profit companies (NFPCs) established specifically to deliver a Plan Vivo project.

**FLEXIBILITY AND SUPPORT**

Plan Vivo is better placed to deal with project issues on a case-by-case basis because it is a small standard and the certification process is managed by the Plan Vivo Foundation itself, rather than through separate, third party auditing bodies. This is helpful for dealing with smallholder projects, as it allows for greater flexibility. The Foundation interacts regularly with developing country organizations, and there is also a network of Plan Vivo coordinators that serves as a valuable resource for organizations or companies serving as coordinators for the first time. Coordinators also occasionally provide training to new Plan Vivo projects.
2.4C OUTSTANDING CHALLENGES

Plan Vivo feels that project marketing remains a challenge, especially at the individual project level. It is often difficult for individual projects to market themselves, and Plan Vivo would like to develop new mechanisms to assist these projects in this regard. Plan Vivo has traded relatively limited volumes of carbon credits compared to other standards, albeit at times with a price premium compared to other standards. Whilst Plan Vivo themselves are positive about the direction of the standard, and the fact that uptake and growth continues, it is noteworthy that objectively they have traded a limited volume of credits. For projects moving volumes at very large scales (i.e., hundreds of thousands of tonnes per year), the Plan Vivo Standard has found limited application to date. This does therefore call into question the scalability of projects, and the Plan Vivo model. In addition, Plan Vivo’s ex-ante crediting, and the perceived lack of robustness on the carbon accounting is off-putting for the market. However, there is certainly a ‘boutique’ demand for credits, linked to this kind of smallholder focused approach.

2.5 SUSTAINABLE AGRICULTURE NETWORK

The Sustainable Agriculture Network (SAN) is a coalition of non-profit conservation organizations that promote the social and environmental sustainability of agricultural activities by developing standards. An International Organic Accreditation Service-accredited certification body certifies farms or group administrators that comply with SAN’s standards and policies. Certified farms or group administrators can also apply for use of the Rainforest Alliance Certified™ trademark for products grown on certified farms.

The SAN is developing a results statement in accordance with the ISEAL Impacts Code. This results statement clarifies that in recent years the SAN has recognized that the standard’s most important impacts are in the social sphere, especially concerning increasing profitability to producer groups. In the 1990s and early 2000s, certification was focused on estates and large farms, mainly in Latin America. This scenario has changed completely during the last years; at present 99.8% of its certified farms are organized in producer groups and certified farm size averages 4ha. In Africa alone, nearly 2 million farmers are certified. The SAN Group Certification Standard is the mechanism that enables certification of small farmers in often challenging socio-economic condition. The Group Certification standard encourages group administrators to create and maintain a management system that proves to SAN-authorized auditors that all group members and their member farms comply with the environmental, social, labor and agronomic contents of the SAN Sustainable Agriculture Standard through a documentation system, trained personnel and group members.

2.5A DEVELOPMENT PROCESS

Standard and policy development and review are coordinated by the SAN Secretariat based in San José, Costa Rica. The SAN is a full ISEAL member, as such ensuring that it meets requirements of ISEAL’s Codes of Good Practice in its standards and accreditation practices.

SAN STANDARD

The (2010) SAN Standard does not currently include provisions for community- or smallholder-led projects. However, the Sustainable Agriculture Network’s standard is starting a two-year standard revision process that will include preliminary discussion with the SAN’s International Standards Committee, as well as a one-year
stakeholder consultation process and final revisions before publication. The new standard will be impact focused, eliminating some of the bulk of the current standard with respect to documentation requirements.

The International Standards Committee has already determined that the next version of the SAN standards will have different criteria for smallholders than for plantations.

**SAN DEFINITION OF SMALLHOLDER (under development)**

The SAN is currently defining the term smallholder in preparation for their upcoming standards revision. It has been determined that the definition will involve a combination of parameters, including farm size and exclusion of permanent contracted labor as well as other issues.

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**GROUP CERTIFICATION STANDARD**

The Group Certification standard has had two iterations, version 1 published in 2004 and version 2 in 2011. The 2004 Group standard introduced the following three principles: Establishment of a Group, Internal Control System, and Chain of Custody, which were elaborated within 23 criteria. A representative square root sample of member farms was audited. If one single farm of the audit sample did not comply with the scoring system for the Sustainable Agriculture Standard, the certification of the group administrator was cancelled or not granted.

Version 2 was initiated when it became apparent that the “one farm fails, the whole group fails” rule did not provide a long-term framework for group administrator systems that manage big groups of smallholders. The 2011 Group standard complies with the ISEAL Alliance Common Requirements for the Certification of Producer Groups.

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**2.5B FRAMEWORK ELEMENTS**

**GROUP CERTIFICATION**

Group certification audits measure the group administrator’s capacity to assure member farms’ compliance with SAN standards’ certification requirements and develop annual inspections of all group members with trained internal inspectors. The SAN secretariat suggested as advice to the CCBA that the most important thing to certifying smallholders is establishing a system that ensures strong group organization, especially with respect to management and training. The SAN has found that individual producers benefit from marketing and training only when the group itself is actively well-managed.

All standard policy documents (i.e. the SAN Sustainable Agriculture Standard, SAN Farm Certification Policy, SAN Prohibited Pesticide List and, if appropriate, the SAN Standard for Sustainable Cattle Production Systems) apply to farms certified under the group scheme. In addition, farms certified in a group scheme must comply with the SAN Group Certification Standard and SAN Group Certification Policy. Group certifications are not restricted by crop or any other criteria.

Group certification audits have two main components. Firstly, SAN-authorized auditors visit a representative sample of member farms (the square root of the number of farms in the group) to check if the group administrator’s training system, internal inspections and risk assessment lead to a sufficient level of member
farms’ compliance with the standard. The auditors then also conduct SAN shadow audits to verify the knowledge of internal inspectors on the group administrator’s management system.

The minimum number of farms that may participate in the group scheme is 3. Groups with more than 17 members are eligible for special scoring rules that lessen the overall impact that one farm’s non-compliance could have on the entire group. In replacing the “one farm fails, the whole group fails” rule, the new compliance requirement for groups of 17 or more members is that up to 20% of the sampled farms may score equal to or higher than 70% (instead of 80%) of the Sustainable Agriculture Standard criteria, if they show full compliance with all critical criteria. The certification scoring system pushes continual improvement of groups over time by progressively increasing the minimum required percentage score. Group leaders need to plan well in order to scale-up participation by existing or group members.

LOCAL INTERPRETATION GUIDANCE AND TECHNICAL TRAINING SUMMITS

The SAN develops local interpretation guidance (crop- and country-specific, as necessary) and holds annual technical training summits for auditors and SAN technical staff. To date the SAN has hosted one technical training summit each year in each region where certification is active (Latin America, Africa and Asia), but to meet the training and capacity building needs of increasingly growing teams, SAN plans to split the summits into sub-regions starting in 2013. These two mechanisms have enabled the SAN to collaboratively work out a lot of the details about how to work with smallholders under the current standard, the results of which will form the basis of the standard revision. The SAN secretariat suggests that the in the future, local interpretation guidance may have two parts: one binding (to ensure good participation by stakeholders), and one informative. To date, the best strategy for successful local interpretation guidance processes has been to start with a succinct document that people actually want to read and use. Local interpretation guidance addresses local legislation, crop-specific issues, and general management elements of the standard.

The local interpretation guidance is the “glue” that ensures participation in the standard, and creating such region- and country-specific material is considered by the standards and policy secretariat to be significantly valuable, rather than burdensome.

Helping auditors keep an open mind and think about how smallholders can meet the same standards as large plantations in terms of things like waste management and infrastructure is also very important to the SAN’s success in certifying smallholders.

MARKETING: CREATING DEMAND AND EARNING COMPANIES’ SUPPORT FOR SMALLHOLDERS

A major factor in increasing the SAN’s certification of small farmers in Africa in recent years has been the Rainforest Alliance and others’ efforts to involve large multi-lateral donors and companies in commitments to increase the supply and sales of Rainforest Alliance Certified™ products. Regarding cocoa and tea in particular, the supply comes largely from smallholders who operate in a context that is far different from that which the SAN is typically used to. Companies provide demand and capacity-building and training resources (delivered directly by the companies’ in-country technical agents and through SAN members) that have enabled the SAN to ramp up its services for smallholders.

WORKING WITH GOVERNMENT
The SAN and its members have engaged government agencies to support the certification of smallholders. The secretariat reports that this can be a slow process.

### 2.5C OUTSTANDING CHALLENGES

#### STANDARD REVISION

As the new SAN standard is developed in 2012-14, challenges related to smallholders include the following:

- **How to define “living income” and basic needs**: Ensuring that workers earn a living income and that workers basic needs are met is a requirement of the SAN standard, but defining the issue is difficult. The SAN is pushing ISEAL to bring different standards organizations together on a common definition and auditor guidance.

- **ILO conventions**: Improving the SAN standard so that even small farms that hire temporary laborers, and some immigrants, obey the conventions.

- **Productivity and quality criteria**: With West African cocoa producers in mind, SAN is developing criteria around producer’s access to the value chain and premiums for their products in order to ensure that farms earn enough profit from selling certified product to justify training and infrastructure investments needed to increase quality to meet and exceed buyers’ criteria. This is the opposite approach to the Gold Standard’s practice of leaving business processes to the projects and evaluating them based only on the feedback they generate from the community.

#### FARMER FINANCING

The SAN has recently started a farmer finance fund to help farmers address the various issues they face in getting certified. Fund management and activities are still to be determined.

### 2.6 VERIFIED CARBON STANDARD

The Verified Carbon Standard (VCS) was founded in 2005 for the validation and verification of voluntary GHG emission reduction projects in a range of sectors. The VCS was established by The Climate Group, the International Emissions Trading Association, the World Business Council for Sustainable Development and a range of other business, governmental and non-governmental organizations.

The VCS Association (VCSA) manages the VCS Program, which in turn sets the standard for GHG emission reduction or removal projects under the VCS. The VCS Program undertakes a variety of activities, including, but not limited to, the accreditation rules for Validators and Verifiers operating under the VCS, the approval process for recognition of other GHG Programs, supervision of the VCS Project Database, and the conditions for approval of VCS Registries.

#### 2.6A DEVELOPMENT PROCESS
Work to develop the Voluntary Carbon Standard (now renamed the ‘Verified Carbon Standard’) was initiated by The Climate Group, the International Emissions Trading Association and the World Economic Forum in late 2005. Version 1 of the VCS was released on 28 March 2006 as both a consultation document and a pilot standard for use in the market. VCS version 2 was released in October 2006 as a consultation document and did not replace Version 1 as the market standard. 150 written submissions were received from carbon market stakeholders on VCS versions 1 and 2. After two years of work, VCS 2007 was released on 19 November 2007.

The VCS relies on expert committees to ensure existing and new requirements reflect state-of-the-art knowledge and global good practice, which makes it a rigorous, credible and conservative carbon accounting standard. On March 8th 2011 the standard was renamed the Verified Carbon Standard (VCS) and Version 3 of the standard was released. VCS now has a process of updates to Version 3 in place. Updates are released approximately quarterly.

### 2.6B FRAMEWORK ELEMENTS

#### DEFINITION OF SMALLHOLDERS

The Verified Carbon Standard does not have a specific definition for smallholders, nor does it have a specific ‘small scale’ project category.

#### SMALL SCALE PROJECT MODALITIES

In the Afforestation, Reforestation and Revegetation (ARR) category of the VCS, approved CDM A/R methodologies are permitted. As a result, projects that follow CDM ‘small-scale category’ methodologies and modalities (see CDM section for more details) can be included directly in the VCS system. The VCSA doesn’t develop methodologies itself. Currently there are no small scale methodologies for project categories other than A/R, however, it would be possible to develop methodologies that aim to earn approval by the VCSA which have special procedures for small-scale projects.

#### GROUPED PROJECTS

VCS allows for Grouped Projects, which are similar to the CDM’s Programme of Activities (see CDM section). Grouped projects bring together several instances of the same activity into one Project Description, and allow new “instances” to be introduced as the project proceeds. This allows projects to start before every instance is identified and to bring more instances into the project on a continuous basis. For example, a project carrying out reforestation does not need to identify the exact location of each area where tree planting will take place, or the details of the owner of the land, in the Project Description before starting the project. Rather, new land can be added as the project proceeds so long as the new instances meet eligibility criteria set out in the grouped project PD. Project monitoring is done through one central information system, and the Project Crediting Period starts on the date the first (installed) system begins reducing GHG emissions. Systems installed later only earn credits for the remainder of the Project Crediting Period.

Although this mechanism has not been designed specifically for smallholders, it is useful for them, and helps address barriers to entry. This mechanism means projects can begin with a small set of activities or farmer participants and add more farmers in with time. This proves useful to smallholders because they are allowed to expand as confidence builds and perhaps more funds are raised to enhance the project, or if farmers are able to
resolve issues which prevent their initial participation (e.g. lack of formal land title), they can join the project later on.

### TAGGING OF VCU WITH CCB VALIDATION, AND COMBINING VCS AND CCB VALIDATIONS

The VCS issues carbon credits and has a registry system overseen by the VCSA but operated by three private entities. The CCBA does not issue carbon credits, so often verification to the CCB Standards is dovetailed with the VCS (or CDM). In that case, the VCS (or CDM) provides the methodology for the carbon component of the certification process, as well as the issuance of the carbon credit. Often if a project is seeking validation or verification to the VCS and CCB Standards, the audit process occurs for both standards at the same time, by the same auditor. This reduces audit costs, especially if the field visit for both certifications can be carried out at the same time. The VCS already has in place a system for tagging VCUs to show when they are from projects that have also been verified to the CCB Standards. This “tagging” of credits gives offset buyers the assurance that credits are from projects that meet the CCB Standards and helps projects in marketing credits.

#### 2.6C OUTSTANDING CHALLENGES

Although the VCS is a robust carbon standard, it still maintains complex requirements for smallholders, such as the high fixed costs of validation. This poses a problem for smallholder projects which want (or need) to start small, and scale up as they still have to pay high costs for project development, enlisting specialist technical assistance, and project validation.

Currently the VCS standards are not geared to smallholders, and don’t have specific provisions for them. The grouped project mechanism is a useful for smallholder projects, however, given the novelty of this mechanism, and small uptake for AFOLU projects so far (only one AFOLU grouped project is registered globally to date), it is unclear what the impact of this mechanism will be on smallholders. Certainly the requirements are complex, which means specialist technical assistance is needed by a project developer to implement this mechanism. VCS projects have to be implemented in accordance with approved project methodologies and methodology development is a timely and costly process. Methodologies are currently developed to fit into a specific AFOLU project category. This means that multi-project activities (e.g. reforestation, avoided deforestation and clean cookstoves) cannot be easily combined, but rather have to be developed as individual project activities. For smallholders, multi-project activities would in many cases be quite suitable. Currently the VCS does not have such provisions.

The VCS is unclear on how much demand there is from smallholder projects for the use of their standard. If there was evidence that smallholders are interested in using the VCS, but currently face barriers to its use, then they might be more encouraged to develop mechanisms for smallholder engagement.

### 3. RECOMMENDATIONS

The standards reviewed in this study present a wide range of ways to address the constraints that are limiting the uptake of the CCB Standards by community- and smallholder-led projects. The following section synthesizes these solutions and presents key enhancements to be considered as the CCBA undertakes measures to revise the CCB Standards and explores the processes and methods through which these changes may be carried out.
3.1 THE PROCESS OF DEVELOPING COMMUNITY- AND SMALLHOLDER-ORIENTED FRAMEWORKS FOR THE CCB STANDARDS

In revising the CCB Standards to enhance the ability of community- and smallholder-led projects to earn certification or highlight their accomplishments, the CCBA will follow its own institutional process, adhering as much as possible to the ISEAL Standard-Setting Code. In accordance with this process, it is recommended that the general progression for standards modifications in relation to smallholders is as follows:

1. **Impact assessments**: Execution of assessments which identify where thresholds should be set for qualification of community- and smallholder-led projects; review impacts of potential group certification schemes; and explore opportunities for alignment with other standards.
2. **Draft**: First draft is created for new framework elements.
3. **Stakeholder consultation and revisions**: A standards committee, presumably, with technical experts and representatives of groups potentially impacted by changes, is convened to review the drafted revisions.
4. **Pilot phase**: Piloting was a part of the initial development of the CCB Standards but has not been a part of the CCB Standards revision process. However, a pilot phase is suggested as an option if the CCBA wishes to understand how a potential change to the Standards or a new piece of guidance could impact projects in practice.
5. **Full launch**: Stakeholder analysis and input is reviewed and incorporated into finalized new CCB Standards with established eligibility period for the older version.

Launching a new version of the CCB Standards is seen as a necessity in order to introduce any changes and at the same time, any additional revisions, unrelated to smallholders could also be incorporated in the new version. A new version of the Standards might not be necessary if changes can be introduced exclusively as interpretation guidance or other policy external to the Standards principles and criteria. Regardless of format, best practices suggest that the most appropriate process is to conduct research, draft revisions, incorporate stakeholder consultations, and pilot activities prior to formally introducing the new framework elements.

The standards included in this review utilize a similar process, varying only with respect to the formality of the organization of the standards body and its independence from technical committees and other advisory bodies.

3.2 FRAMEWORK ELEMENTS TO INCREASE UPTAKE OF THE CCB STANDARDS AND BENEFITS EARNED BY SMALLHOLDERS AND COMMUNITIES

It is a challenge for the CCBA to strike the right balance between maintaining the rigor of the standard whilst also making the CCB Standards more usable for communities and smallholders so that these populations may obtain benefits as a result of increased use of the standard. The format in which these issues are addressed – through existing, modified or new standards, policies, guidance or other support structures – is very important to increasing uptake among communities and smallholders. The analysis and research conducted to produce this report and presented herein highlight several significant issues that should be considered by the CCBA and stakeholders: i) identify the target group and its benefits, reviewing the Standards themselves, assessing other framework elements in the Standards system, and supporting the Standards and their use.
The CCBA’s timeline and priorities for this project will be determined by the stakeholder group and CCBA members together with the secretariat based on a variety of constraints and opportunities including funding and the limitations of the standards revision process. If an issue presented below deserves immediate consideration in order to order to set the stage for future work, it has been noted.

A. IDENTIFYING THE TARGET GROUP AND HOW IT SHOULD BENEFIT

One issue crucial to the development of framework elements for the CCB Standards that benefit smallholders and communities is to determine who should benefit and what those benefits should be, using clear concise definitions. If the CCBA makes “accommodations” for a target group in order to enable it to achieve certain benefits, it must precisely define who that target group is. CCBA members and stakeholders should establish a detailed working definition of the target group and what it means for that group to obtain “benefits” before proceeding to evaluate issues related to the Standards, their infrastructure and their support system.

The following three questions were raised in the examination of the ways that other standards systems make accommodations for community- and smallholder-led projects.

1. Does the CCBA aim to address uptake by projects based on size or who is involved?

If the target projects are those within a certain size range,

- How is size determined: total hectares, total annual expected emissions, or hectares or annual emissions of component parts?
- What size project – or group of projects – qualifies?

If the target projects are those with a specific population involved,

- How is the target population defined?
- How is the target population involved in the project?

The Gold Standard and the CDM address provisions of their standards at small-scale projects (and micro-scale projects, in the case of the Gold Standard). The CCBA could choose to set eligibility requirements for small-sized projects that are defined by an annual cap on emissions (as per the Gold Standard), land management unit size, or both. Such eligibility requirements are relatively straightforward and may address the target populations.

Alternatively, the CCBA could decide that only projects that have significant community or smallholder involvement are eligible for special provisions. Or the CCBA could decide that only projects that fall below a certain size threshold or definition of smallholders and that have significant community or smallholder involvement are eligible for special provisions or would be allowed to follow specific smallholder criteria. Targeting specific populations directly ensures that they will receive benefits, but requires definition of the terms “community” and “smallholder” or any other terms chosen to represent the target population. For reference, the CCBA could review the FSC’s definitions of terms including small forest management unit, low-intensity forest management unit, Indigenous Peoples, Traditional Peoples and community producers or the SAN’s definition of smallholder (currently under development).

If the CCBA decides that a target population should benefit from specific modifications to the Standards, it must provide a clear definition of how that population should be involved in the project for project proponents and auditors. The following list describes some ways that the “target population” might be involved in the project.
• Project originator, the group that comes up with the idea of the project;
• Project owner, assuming all legal responsibility and risk for the project;
• Project manager, responsible for day-to-day management of project activities;
• Implementation agent, responsible for carrying out project activities;
• Financial stakeholder, eligible for direct payments as the project generates profits; or,
• General beneficiary, receiving the medical, organizational, social, safety or other benefits provided by the project.

This list is not exhaustive and the CCBA will need to define “involvement” of the target group as it sees it benefiting most. Some of these roles are more probable than others - for example, communities and smallholders are unlikely to be the project originators but may more frequently benefit directly or indirectly from a project originated and owned by an external group. Some of the roles noted relate to benefit sharing, which is also addressed in section B3, below.

It is important for the CCBA to consider how it will use its target group definition. Would defining the target group be used simply in order to determine where marketing assistance might be directed, or would that group be eligible to meet different criteria than other users of the Standards? If the latter, the CCBA would need to identify criteria that community- and smallholder-led projects don’t have to meet, or create two options for certain criteria – one for projects that meet community- and smallholder-led eligibility requirements and another for projects that do not. The risk of modifying the standard in this way is the potential of generating a public perception that certain projects create carbon credits that are different from others, when the goal is to create emissions reductions that are identical, regardless of how they are created.

B. STANDARDS ELEMENTS

Standards should not be considered in isolation, without the context provided by the other framework elements that support them. However, if the Standards are to be revised, the decision to make a revision must come early in this initiative in order to allow full time for the cycle of drafting, consultations and public comments, revisions, and, if desired, piloting before other elements (validation and verification systems, guidance documents) can be designed as support.

B1. MULTIACTIVITY PROJECTS AND LANDSCAPE APPROACHES

In the context of smallholder projects, small scale activities and the nature of rural land use, the ‘multiactivity projects’ approach is often considered to be the most effective for directly involving smallholders. The current structure of CDM and VCS validation, however, precludes multiactivity project schemes and since many projects using the CCB Standards also use either the VCS or CDM those proponents cannot carry out multiactivity projects. Despite this fact, it may be worth considering whether the CCBA, moving forward, could find a way to incorporate multiactivity projects either for proponents that want to use only the CCB Standards or by dovetailing with a carbon accounting system that allows for such an approach, if one is developed. A ‘multiactivity project’ could for example include A/R, improved forest management (IFM), forest conservation and clean cook stoves all in one project, possibly with all activities occurring on a given small-holding.

During interviews for this report, the World Bank expressed interest in ‘landscape approaches’, so it might be worthwhile for the CCBA to initiate discussions with them to explore collaborations. Similarly, there is growing momentum for ‘jurisdictional’ approaches to REDD+, and within this there is scope for combining multi-project
activities. It could be useful for the CCBA to engage with these discussions, and encourage some linkage with emerging programmes, pushing for approaches which are viable and inclusive of smallholders. What is clear is that if the CDM and VCS do not move towards ‘landscape approaches’ and the CCBA does not find a way to do so without them, then the CCBA is missing out on an important area of work that is especially relevant to smallholders. The CCB should try not to be limited by the scope of CDM and VCS.

B2. PROGRAMMATIC APPROACHES

It is essential that the CCBA develop a mechanism for linking with Programmes of Activities (CDM and Gold Standard) and Grouped Projects (VCS⁴). These are mechanisms which have recently emerged and hold promise for smallholders. Given the newness of the mechanisms, there are limited AFOLU examples in practice so far, however, an increasing number of projects are under development. Since the CCB Standards do not have a specific mechanism for incorporating new project activities after a PDD has been created, it is not well-suited to support Grouped Projects or Programmes of Activities. Currently, a program of activities that wanted to use the CCB Standards could only earn validation for the first ‘CPA’, for CDM and Gold Standard, or ‘instance’, for VCS. In its next version, the CCB Standards must be flexible enough to keep pace with programmatic developments in the CDM and VCS in particular (and other credit-issuing mechanisms that it finds useful).

Programmes of Activities are particularly useful however for smallholder projects because they remove key barriers to entry. As described previously, PoAs and Grouped Projects lay out a list of eligibility criteria which permit the inclusion of new project lands following validation, as long as they fit in with the criteria, within a pre-specified ‘Physical/Geographical’ location. Ideally, the CCBA could permit such a mechanism as long as it covered the breadth of the CCB Standards’ wide social and environmental scope. Detailed thinking will be needed from the CCBA on how to achieve this. Ideas for how to proceed include:

- Developing a CCB Standards Programmatic framework that follows a similar framework to either the CDM or VCS provisions for PoAs or Grouped Projects, which require a list of eligibility criteria in the PDD relating to specific community and biodiversity eligibility requirements and monitoring criteria for any potential project activity within the programme’s ‘Physical/Geographical’ boundaries.
- The CCBA could take a slightly different approach and request a more general, regional-level community and biodiversity assessment at the initial validation that would address issues within the ‘Physical/Geographical’ location where the PoA or Grouped Project could take place. It could then request more detailed assessment as new CPAs or instances are added in following the criteria approach described above.

An important consideration for the CCBA will be whether ‘scaling up’ of activities beyond the initial CPA or ‘instance’ could actually alter the biodiversity or community impact. For example, reforesting on 1,000 hectares might not impact stream flow or wildlife corridors, but scaling up to 10,000 hectares could cause a different impact altogether on hydrology and wildlife movement. The CCBA should also bear in mind ‘reputational’ risk of including

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⁴ The FSC and SAN also have group certification schemes that share many of the characteristics of group certification under the VCS and also PoAs under the CDM and Gold Standard. We focus on the programmatic approaches to carbon projects in this section and address the distinguishing characteristics of SAN and FSC groups in the next section.
new project activities within a CCBA project prior to third party validation. If the activities are not implemented properly, this could lead to negative social or environmental impacts during the interim years between adding a CPA/instance and verification. In the current set up with the CDM or VCS, if new lands are added which end up not meeting eligibility criteria when assessed by a third party at verification, this results in those specific project activities not earning CERs/VCUs. In the CCBA context, however, this could mean irrevocable damage has already occurred to the overall community or to biodiversity.

**UNIQUE CHARACTERISTICS OF FSC AND SAN GROUP CERTIFICATION**

In order to add new members, group certification systems in the FSC and SAN styles take approaches that are similar in some ways to those of CDM and VCS. They differ in that in FSC and SAN (and under the ISEAL Alliance’s Common Requirements for the Certification of Producer Groups), the group certification system shifts the audit responsibility from external to internal audits. In these group certification schemes, the ISEAL Alliance maintains, “the management system plays a vital role in supporting a learning organization whose members seek to improve their practices over time.” The main emphasis is on management of the group and the group’s infrastructure as a learning mechanism. The group manager is responsible for bringing new activities into compliance with the standard and preparing them for audit, as they are in CDM, Gold Standard and VCS programmatic schemes, but carries the additional responsibility of demonstrating to auditors that it has carried out internal auditing. SAN and FSC group certifications rely on strong internal management systems to enable their auditors to check only a sample of the activities to be certified with relatively low risk that the un-sampled activities will not be in compliance.

If the CCBA pursues a group certification scheme, it might aim for that scheme to comply with the ISEAL Alliance’s Common Requirements for the Certification of Producer Groups. However, the CCBA should consider that it may be more challenging to maintain consistency in carbon accounting in a programme where activities may join at any time than it would be to maintain consistently high social and biodiversity standards. In the carbon project context, the amount of reliance on the internal management system that is given to group managers in the FSC and SAN systems could increase project risk significantly when that group manager is charged with ensuring the integrity of the group’s total carbon production.

**B3. RECOGNIZING EQUITABLE BENEFIT SHARING**

The CCBA perceives market demand for credits and investment opportunities in projects that can demonstrate equitable benefit sharing schemes. To enable projects to demonstrate such schemes, the CCBA could develop a new principle related to equitable benefit sharing and attach it to the Standards as an optional “module”, similar to how the Gold climate, community and biodiversity “modules” are currently incorporated. The CCBA may wish to permit any project to attempt to meet criteria under the benefit sharing principle (a straightforward option), or it may wish to limit projects that can meet the criteria to those that engage the target group, i.e. smallholders and communities, in a specific way (an option that requires clear definition of the target group but offers them a unique opportunity to distinguish their projects).

**B4. COMPATIBILITY AND SYNERGIES WITH OTHER STANDARDS**

Market surveys show that it is very common for projects to earn validation and verification to the CCB Standards in combination with another standard, at least in part because the CCBA does not issue credits. Most often, the CCB
Standards are used in combination with the VCS. Recently, the CCBA has been working with the VCS to develop templates for project descriptions, validation reports and other documents that make it possible for VCS projects that are also validated and verified to the CCB Standards to be registered as such in the VCS registry.

The CCBA is beginning to work with the Gold Standard as it explores a scope expansion to land-use projects.

**More Smallholder Provisions in the CDM and VCS Standards**

If the CCB Standards continues in their current format then it is likely that many projects using the CCB Standards will continue to also use other carbon accounting standards, such as VCS and CDM. Currently the CCB dovetailing with the VCS is a major component of the market of projects using the CCB Standards. Under this setup, the CCBA has less control on what is required in the ‘climate’ and carbon accounting sections of validated and verified projects, as they follow the provisions and methodologies of other standards. In some cases this makes inclusion of smallholder projects quite challenging given the rigor and cost of meeting the CDM/VCS carbon accounting requirements. However, below are several options available to the CCBA in relation to its collaboration with CDM and VCS that can help address challenges faced by smallholders:

- Request that the CDM and VCS develop more tools which would make achieving their protocols more accessible. For example there could be ‘off the shelf’ tools for delineating project boundaries, assessing baselines, and monitoring
- Encourage the CDM A/R working group to develop standardized A/R baseline for project scenarios that would best benefit smallholder farmers
- Encourage the CDM to create some fund to help support validation costs for SSC projects
- Request the CDM to make tools or guidance documents which help reduce the project development costs for A/R projects such as analysis in relation to project boundaries, and to make other tools or provisions which make the process easier for smallholders
- Request that the CDM revisit the PoA provisions specifically in relation to A/R projects and SSC A/R provisions, and remove any limiting criteria
- Encourage the VCS to create a facility on their website which highlights smallholder projects
- Discuss with the VCSA the need for small scale modalities for methodologies for project categories other than A/R that would benefit smallholders – e.g. improved forest management, REDD+ – and whether there is any opportunity to tailor existing methods to smallholders through a simplification process

Given that the future of the CDM is unclear and it has a heavy bureaucracy, CCBA may wish to target any such “lobbying” activities at the VCSA.

**C. Standards System**

**C1. Validation and Verification**

Altering the audit process is a common way that standards organizations streamline the process for community- or smallholder-led projects. There are a variety of issues to consider with respect to validation and verification, many of which dovetail with the structure of other framework elements:

**How much guidance the criteria or interpretation documents provide auditors about how to make validation/verification decisions:**
The CCB Standards aim to have a global reach and relevancy for projects led by many different types of developers. Currently, however, auditors find the CCB Standards to be quite vague and, in that sense, challenging to interpret. In order to highlight communities’ and smallholders’ efforts in project development and make it easier for those groups to understand what is expected of them in the audit process, the CCBA might 1) set up more quantitative indicators; 2) develop more specific regional or national interpretation guidance; and 3) develop CDM/VCS-style tools for project developers that project proponents can use to create direct inputs for the audit process. Such new or streamlined structural elements would assist auditors in evaluating projects, and shorten the audit process, thereby reducing costs for the project proponent.

WHETHER OR NOT PROJECTS THAT QUALIFY AS “LOW-RISK” MIGHT BENEFIT FROM REDUCED OR DIFFERENT VALIDATION AND VERIFICATION REQUIREMENTS:
In this case, validation and verification guidance would be developed that clearly explains to project developers and auditors what to expect from a “low-risk” project and what to expect from a “high-risk” project in order to meet certain criteria. Those risk categories could be the same or different than the qualification required to define a target group, i.e. community- and smallholder-led projects. The challenge in establishing reduced or different audit requirements for different projects for most carbon standards is that the commodity validated or verified must be the same between projects: one ton of carbon. However, given the somewhat inherent incomparability of the social and environmental elements of projects that use the CCB Standard, perhaps the CCBA could take a different approach than other carbon standards that are not trying to capture these costs..

WHAT ENTITY CONDUCTS REVIEWS AND AUDITS:
Regarding auditors, the CCBA currently relies on entities accredited by the FSC, as designated operational entities under the CDM or to ISO 14065:2007 with the VCS Agriculture, Forestry or Other Land Use scope. Project proponents who aim for validation/verification to the CCB Standards plus another standard, such as the VCS, often choose an auditor who is qualified to perform a dual audit. However, whether or not they aim for validation or verification to another standard, projects may be interested in an audit of the CCB Standard that is conducted by the CCBA. In order to offer validation and verification itself, the CCBA would need to build the appropriate infrastructure and/or contacts. The Gold Standard has been able to ask a significantly lower fee for the internal validations and verifications it provides than the fee asked by independent auditors; the CCBA may be able to achieve this, as well. A potential downside of validations and verifications conducted by the CCBA would be the lack of independence in auditing, but here, too, the CCBA might be able to learn from the Gold Standard’s experience and reduce this weakness as much as possible.

WHETHER OR NOT PROJECTS MAY BE SCALLED UP IN SOME WAY SO THAT AN AUDIT COVERS MORE THAN ONE ACTIVITY:
If a scaling up mechanism is implemented, auditing time and resources might be streamlined in a corresponding way. See the programmatic approaches section.

C2. TOOLS AND GUIDANCE
The CCBA could create more guidance documents and tools to streamline the CCB Standards process and make it clearer to users. During interviews for this report, auditors stated that one of the best assets standards organizations can provide is interpretation guidance. In the case of the CCB standards, such guidance could be regionalized and set out CCBA’s expectations for what different project types must do to meet its criteria. Interpretation guidance has the advantage of not requiring alterations to the standard itself. Such guidance and tools that help project proponents create direct inputs to the audit process (referred to in C1) could benefit all
groups, but especially the target audience. The CCBA has plans to develop specific guidance. Based on the findings of this report, it would be worthwhile for the CCBA to consider the following ideas when undergoing the process for developing such guidance:

- Maximizing use of the CCBA’s current list of technical capacity providers: The CCBA could provide this list online and promote its distribution in hard copy through partners, such as validation/verification bodies and members
- Utilizing the knowledge of involved stakeholders to develop interpretation guidance: Aiming to develop guidance for the standards’ criteria through regional workshops for project proponents & auditors
- Creating a detailed project/methodology eligibility tool tailored to the target group: Devising specific, easy to use tools that allow smallholders and communities to determine their eligibility to use the specific CCB criteria
- Developing social and biodiversity impact assessment tools: Whilst the Social and Biodiversity Impact Assessment Manual produced by the CCBA is very detailed, it is also very long and complex. Some tools which draw on the recommendations of that document would help reduce the time needed for project development using the CCB Standards, and mean that not every project has to ‘re-create the wheel’.

Another way by which the CCBA could alleviate some of the challenges auditors and smallholder-led projects face is through the development of a toolkit to support the CCB Standards criteria. This could directly benefit community- and smallholder-led projects by making project development clearer and easier to understand and implement, and would further benefit auditors by providing assistance and decreasing the time it takes to conduct an audit. Tools that could potentially be included are:

- Off the shelf tools which can provide a framework for the community monitoring plan e.g choose 3 indicators to assess xx criteria;
- Off the shelf tools which can provide a framework for the biodiversity monitoring plan e.g choose 3 indicators to assess xx criteria;
- A tool that is developed in collaboration with the Integrated Biodiversity Assessment Tool (IBAT) project to allow project developers to upload their project boundary to check it against a REDD list species, or find out about national HCV areas
- A tool for the free, prior and informed consent (FPIC) process, which this could tie into the eligibility criteria for using the smallholder criteria. Ideally it would be some kind of tool that lays down specific guidance on how to assess smallholder engagement and consent

D. SUPPORT

D1. PROJECT MARKETING

For marketing purposes, the CCBA could assist community- and smallholder-led projects by helping promote them specifically, featuring more detailed, story-like descriptions of the qualified projects’ characteristics. This could be done in any publicity materials, but also through the CCBA website and social media. Furthermore, the CCBA could support events that showcase smallholder projects. Investments in marketing would require secretariat resources and because of the need for brand management it would be challenging to invite members to take on very much of the responsibility for promoting community and smallholder projects. If the Standards are to be revised, their
launched would provide a terrific opportunity to kick-off a marketing campaign around community-led and smallholder-led projects.

One relevant lesson learned from FSC’s development of a smallholder and community label is that such an initiative requires a critical mass of projects. Depending on the target group definition the CCBA uses, it may or may not have sufficient projects (and/or credits from those projects, assuming the credits themselves wear any distinct marketing) to create a unique identifier for community- and smallholder-led projects. This could be an issue for longer-term consideration.

D2. THE COST OF COMPLIANCE, AUDITS AND EARNING BENEFITS FROM THE STANDARDS

Standards organizations recognize that engaging with a standards process may cost relatively more to community- and smallholder-led land managers. One of the ways that the FSC and SAN are dealing with this issue is to address it directly by launching grant-making funds aimed at i) helping smallholders achieve compliance with the standard, and ii) covering the cost of auditing and/or maximizing the benefits they earn from certification (for example, through marketing). Plan Vivo keep costs low by managing a large part of the process ‘in-house’, including initial review of projects, and relying on the advisory board who offer services pro-bono or below market rate. However, the Plan Vivo model doesn’t seem to be especially viable for the CCBA as its independence and scalability is questionable.

Some standards organizations engage with bilateral, multilateral or private funding organizations to provide small- and medium-sized enterprise funding to entities involved in certification. This scale of funding might be particularly useful if the CCBA implements a programmatic approach; in that case a regional-scale capacity-building and/or marketing campaign could be very effective.

D3. CAPACITY BUILDING

Representatives of the standards reviewed consider their capacity building efforts to be linked with the development and dissemination of tools and guidance and are quite important for increasing use of their standards. However, experience shows that capacity building offered by standards organizations often has little effectiveness due to lack of resources and expertise when compared with existing demand. The CCBA’s secretariat would need substantially more resources if it is to take on capacity building activities. It could potentially call on members for support in this area.

All organizations involved in the process of developing projects with and for communities and smallholders, including those groups themselves, could benefit from workshops or in-person guidance on implementation and interpretation of the Standard. If the CCBA secretariat’s capacity were increased, or if CCBA members and partners could take on this responsibility, regional workshops for project proponents and auditors could be held. Such workshops would offer opportunities for interpretation of criteria at the regional level as well as an exchange of ideas regarding technical and marketing issues.

D4. GOVERNMENT ENGAGEMENT

Some organizations (FSC, SAN, ISEAL and the VCS, particularly) are developing strategies for working with governments to align their certifications with existing or developing legislation or are working actively with governments on incentives for maximizing sustainable production that promote use of their standards. The CCBA is
well-positioned to do this, given its involvement with the REDD+ social and environmental standards for
government-led REDD+ programs, but action in this area would not likely benefit community- or smallholder-led
projects specifically.
## ANNEX I. LINKS TO RELEVANT STANDARDS DOCUMENTS

### CLEAN DEVELOPMENT MECHANISM

<table>
<thead>
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<th>Document Title</th>
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<td>to facilitate their implementation</td>
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<td>CDM Forms, including small scale modality and PoA Forms</td>
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<td>Group Certification Briefing Note 1</td>
<td>October 2008</td>
<td><a href="http://www.fsc.org/group-certification.371.htm">http://www.fsc.org/group-certification.371.htm</a></td>
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<td>account of scale and intensity</td>
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<td><a href="http://www.cdmgoldstandard.org/project-certification/rules-and-toolkit">http://www.cdmgoldstandard.org/project-certification/rules-and-toolkit</a></td>
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- Annex AK Program of Activities Design Consultation Template
- Annex AL Program of Activities Design Consultation Template
- Annex AL Program of Activities Local Stakeholder Consultation Report Template
- Annex AM Program of Activities Passport Template
- Annex AN Micro Program of Activities Design Document Template
- Annex AO Micro-program Activity Design Document Template
- Annex AP Micro-scale Project Design Document Template
- Annex AQ Micro-scale Validation Report Template
- Annex AR Micro-scale Verification Report Template

### ISEAL ALLIANCE

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<td>Common Requirements for the Certification of Producer Groups</td>
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### PLAN VIVO

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