Compilation by principle of all comments on the Draft Third Edition of the CCB Standards of 22nd March 2013 received during the first 60-day public comment period 22nd March to 31st May 2013 26th July 2013				
Person/Organization making the comment	Comment number	Criterion/ Indicator	Comment	Response
Overall				
4	4.01		I think that much of the footnote could be included directly to the text. It is very distracting to keep going back and forth between the text and footnotes. I would suggest keep links to websites and references as footnotes, but put everything else in the text.	The footnotes have examples and definitions. They have been retained in the main text since the indicators would become too detailed if we included examples and definitions.
5	4.02		From the introduction: "The Gold level criteria have been made more stringent, thus setting a higher bar for projects to achieve the Gold level." Question: Will existing (verified) projects need to meet these new more stringent criteria upon their next verification period, and what is the process for doing so?	The process for existing projects to migrate to the new version is outlined in the draft revised Rules for Use of the CCB Standards.
6	4.03		It would be useful to have a list of referenced tools and resources, kind of like a glossary.Glossary: add validation, verification, project design documents... all defined in Rules document but referred to in Standards.	Tools are presented in Appendix A. Terms defined in Rules are added to Glossary in Appendix
7	4.04		Kindly involve climate related land based programs.	The Climate, Community & Biodiversity (CCB) Standards foster the development and marketing of projects in land use sector that deliver credible and significant climate, community and biodiversity benefits in an integrated, sustainable manner. CCB Standards can be used for any land-based programs that meet the criteria in the Standards.

| 9 | 4.05 | Community Section | After reviewing the draft, we would like to take this opportunity to offer a few broad comments on the revisions.   It appears the most extensive changes were made to criteria in the General Section related to stakeholder engagement and the definition of community groups (including sections G1 and G3) and to the entire Community section.   Overall, the revised standards seem much more heavily focused on the community aspects of projects.   For example, project proponents are now required to perform a "stakeholder mapping exercise" and engage in multiple levels of community participation – not just during project design but throughout the implementation and monitoring of the project – that was never required or contemplated in the previous editions.

We recognize and applaud the CCBA's efforts to protect the rights of defined community groups and stakeholders and ensure their participation in projects. However, this shift in focus represents a significant departure from the prior editions of the standard, which gave equal attention to the community, climate and biodiversity aspects of each project. If we were to evaluate the Third Edition now - without prior knowledge of the preceding editions - I think The Conservation Fund might conclude that these standards were not a good fit for our projects because many of these new criteria are not applicable to our projects. It would be difficult to migrate our completed projects from earlier editions to the new criteria of the Third Edition.

We commend the fact that the CCBA wants to encourage project development across the globe and in a wide array of countries, but hope that the CCBA recognizes that high quality projects are being implemented in the United States and the Standards must be flexible enough to accommodate projects of all kinds.   In addition, there are many cost barriers to implementing forest carbon | While the new version of the standards emphasizes stakeholder engagement and FPIC by developing a dedicated criterion with a list of indicators for Stakeholder engagement and a dedicated sub section under the Legal status and property rights criterion for rights and free and prior informed consent(FPIC) with a list of indicators, none of this is a change in focus of the Standards. This version just clarifies these indicators in an attempt to provide more guidance on what is expected (e.g.) stakeholder mapping was already outlined in the SBIA manual.

CCBA continues to want to encourage project development across the globe and in a wide array of countries and we suggest that project proponents approach the indicators in the new version in the same fashion as they did the previous version. |

			projects and we hope that the Alliance considers what costs the voluntary market will bear as the CCBA makes continual changes to the standards.	
6	4.06	Comment p17	Comment p17: Substitute "have long-term impact" for "last a long time", as I think that the impact of those conflicts is more a concern than their actual duration. Though perhaps it is both	The comments will not appear in the new version of the Standards.

General Section

1	0.01	Project Summary	Suggested changes: "Objectives," "Lead project entity," and "Location." Justification: This heading is misleading. The indicators are not about the summary of the project.	Heading changed to "Project Overview"
1	0.02	G 1.2	Suggested: Delete the word 'explicit,' or use a better wording. Justification: What is meant by 'explicit' is unclear. The criteria is easier to understand without it. Or, maybe, "major CL, CM, and B objectives directly sought to be achieved by the project interventions"?	"Major" and "Explicit" deleted. A footnote added "The project shall have distinct climate, community and biodiversity goals such that climate, community or biodiversity benefits are not just a result of positive externalities "
2	0.03	G 1.2	The theory of change approach could be cited as a way to help the project proponent to identify project goals and viability.	Goals are to be fixed and the theory of change explains how project activities contribute to these goals – not other way around.
6	0.04	G 1.2	Delete explicit (same as Tom Evans comment) - I don't think that the word "explicit" emphasizes all three areas of benefit more than leaving it out, and the phrase "major explicit" is awkward.	"Major" and "Explicit" deleted. A footnote added to explain "explicit": "The project shall have distinct climate, community and biodiversity goals such that climate, community or biodiversity benefits are not just a result of positive externalities "
6	0.05	G 1.3	Move "of the project" after "and basic physical and social parameters".	Suggestion accepted

1	0.06	G 1.4	Suggested change: Definition of Project Zone Justification: It is very difficult to define areas that project activities directly generate net biodiversity benefits. Project's direct interventions takes place in the Project Area, e.g., restored forest corridor. The Project Zone could then include forest patches that are connected by the reforestation activities in the corridor. The forest patches that are connected may have very large in size compared to the Project Area. It seems not logical to say the project is directly generating biodiversity benefit in all such areas Project Zone, but there is no logical way of dividing the forest patches either. The issue becomes more complicated when discussing off-site biodiversity impact. Either provide more guidance how to define Project Zone, or withdraw the idea of Project Zone and stick to Project Area only.	Project Zone definition changed to "The Project Zone is defined as the area encompassing the Project Area in which project activities that directly affect land and associated resources, including activities such as those related to provision of alternate livelihoods and community development,are implemented. " Guidance will be developed that provide examples of different types of projects and how project zone would be defined in each of those cases.
6	0.07	G 1.4	Strike "aim to be generated"	The Project Area is where the project aims to generate net climate benefits and not where net climate benefits are generated.
8	0.08	G 1.4	I am not sure why we define a supplementary spatial area for biodiversity activities, but not for community activities. Indeed, Indicator 6 requires that 'additional surrounding areas predicted to be impacted by project activities' be mapped, but this class of land is not explicitly named. I feel it may be clearer for auditing, and more consistent with the VCS approach, to require the spatial extent of all activities to be defined, as three shapefiles - climate activities define the Project Area (which I presume is the forest land on day 1, as it is under VCS), and we could then refer to a Community Activity Area (e.g. adjacent farmland) and a Biodiversity Activity Area (e.g. adjacent non-forest habitats), the sum of the three Areas together forming the Project Zone encompassing all activities. The Community	The supplementary spatial area is included to take into account supplementary activities (e.g. alternate livelihood activities) that may be undertaken outside the project area. This is called the Project Zone in the standards. Community activities have been delinked from the project zone since Communities may live far away - so it did not make sense to define communities spatially. We have now clarified in the second draft that "The Project Zone is defined as the area encompassing the Project Area in which project activities that directly affect land and associated resources, including activities such as those related to provision of alternate livelihoods and community development, are implemented. "

			Activity Area would presumably be very similar to the 'Leakage Management Area' in VCS terminology. In the case of expansion of grouped projects to villages that are not yet known, perhaps the proponent could be asked to define some criteria for the classes of land to be included in the expanded Community Activity Area, and map them at the next validation?	Thus it is the area used to demonstrate biodiversity net benefits by inference and not by definition. "Communities" may live outside the project zone and thus net benefits when demonstrated for communities means that project zone is no longer the appropriate reference.
1	0.09	G 1.5	Suggested change: Make the following an independent indicator and bring it before G1.5 (i.e., G1.4-bis): Explain the process of stakeholder identification and analysis used to identify Communities, Community Groups and Other Stakeholders Justification: It is very difficult to identify all stakeholders, but can be done properly and efficiently if based on a defined identification procedure. This also makes the assessment of the adequacy of stakeholder identification more systematic and objective Suggested change: ~~Identify and list~~ List all Communities, Community Groups and ~~who derive… within them. Identify and list all~~ Other stakeholders identified using the process described in G1.4-bis. ~~who can potentially affect or be affected by project activities~~.	Suggestion accepted.
3	0.10	G 1.6	We feel it is important to provide guidance that enables projects of all sizes to identify all appropriate communities and community groups and that encourages projects to be as inclusive as possible. For some projects, there may be a single, complex community with numerous groups that have different values that need to be identified. For other projects, there may be hundreds of very small, relatively homogeneous communities where the only community	We will develop guidance on identification of community/community groups with some concrete examples of some projects. Suggestion on expanding the definition of community to include the language "a self-recognized social unit with a governance structure" is not taken : Adding this to the main definition will make community identification more difficult and restrictive. Also, please

groups are gender divisions. And there will be many projects somewhere in between.

For the second example, it may become untenable to document all communities. They or their VVB may feel many additional subgroups are needed. The requirements in the community section for evaluation of project impacts and monitoring results will be overwhelming. The project may attempt to justify the exclusion of some communities to limit the number of communities and maintain a more manageable work load. This seems contrary to the intent of CCB and the Standard. In these instances, we suggest allowing the project to document the homogeneity, which will be evaluated by the VVB, and allowing the project to use a fair, representative sample of communities rather than a universal sampling would drive the intended behavior while maintaining the rigor desired.

We recommend amending the footnotes to read (italics indicate new or changed text):

'Communities' are defined as all groups of people—including Indigenous Peoples, mobile peoples and other local communities—who derive income, livelihood or cultural values and other contributions to well-being from the Project Area at the start of the project and/or under the with-project scenario. *In cases where numerous small communities can be shown to have homogeneous patterns of social organization, political structure and livelihoods, these communities may be identified as a group and the project may identify the most critical communities to be the initial ones directly involved in project design and implementation based on the threats to the project area,*

review definition of community characteristics in CM 1.1 (footnote 66).

The definitions of Community and Community groups have been changed based on suggestions 0.10 and 0.11 :

'Communities' are defined as all groups of people—including Indigenous Peoples, mobile peoples and other local communities—who derive income, livelihood or cultural values and other contributions to well-being from the Project Area at the start of the project and/or under the with-project scenario. In cases where numerous small Communities can be shown to have homogeneous patterns of social organization, political structure and livelihoods, these communities may be identified and listed as a Community. In identification of Communities, it is permitted to consider significance of user populations and of their level of use such that distant or intermittent user groups who have very limited dependence on the site need not be defined as Communities.

'Community Groups' or sub-groups are defined as groups whose members derive similar income, livelihood and/or cultural values from the Project Area and whose values may be different from those of other group; such as Indigenous Peoples, women, youth or other social, cultural and economic groups. The number of appropriate groups will depend on the size and complexity of the community. 'Indigenous Peoples' are defined as distinct social and cultural groups whose members identify themselves as belonging to an indigenous cultural group. (See Glossary

			involvement in project activities or other factors. 'Community Groups' *or sub-groups* are defined as *"minority"* groups whose members derive similar income, livelihood and/or cultural values from the Project Area and *whose* values *may be* different from those of *the dominant* group; such as Indigenous Peoples, women, youth or other social, cultural and economic groups. *The number of appropriate groups will depend on the size and complexity of the community.* 'Indigenous Peoples' are defined as distinct social and cultural groups whose members identify themselves as belonging to an indigenous cultural group. (See Glossary for more information.) We also suggest expanding the definition of a community to include language such as "a self-recognized social unit with a governance structure". This will both align the Standard's definition with commonly used definitions and help guide projects on properly identifying a community.	for more information.) The suggestion of Community groups as minority groups is not taken since there may be some groups such as women who are not minority and we would want to ensure benefits to these groups.
8	0.11	G 1.6	Footnote 15. The identification of communities should be permitted to consider the significance of user populations and of their level of use? (i.e. '...who derive <u>significant</u> income, livelihood....'). In any large site there will be some more distant or intermittent user groups who have very limited dependence on the site, inclusion of whom might greatly increase project running costs.	Suggestion accepted. The following sentence added to the Communities definition: . *"In identification of Communities it is permitted to consider significance of user populations and of their level of use such that distant or intermittent user groups who have very limited dependence on the site need not be defined as Communities."*
5	0.12	G 1.6	We would appreciate a clarification of the definition for 'Other Stakeholders' – see also comment on CM3 below.	Guidance on identification of Other Stakeholders with some concrete examples from some projects will need to be developed.

			Suggested change: …and additional ~~surrounding~~ areas that are predicted to be impacted by project activities <u>that may be identified in CL3</u> ~~(e.g., through leakage…impacts)~~.	Accepted suggestion on language and referencing.. Leakage applies to Climate, Community and Biodiversity impacts. G 1.7 changed to ".... identified in CL3, CM3 and B3"
1	0.13	G 1.7	Justification: Since leakage is dealt with in other criteria, make it concrete by referencing that part. Biodiversity leakage is hard to map. What can be mapped is mapped in CL3. Other Stakeholders, who may be located very far from the project area, even if they can have geographic attributes, may not be suitable for being mapped here.	
3	0.14	G 1.8	As stated in the referenced Social and Biodiversity Impact Assessment (SBIA) Manual for REDD+ Projects (Richards and Panfil, 2011), demonstrating causal attribution is difficult. The use of the term "causal" in this requirement may lead projects and VVBs to expect more singular, isolated cause and effect relationships between project activities and predicted impacts than can reasonably be demonstrated in complex systems. In addition, some activities are not short-term and some outcomes such as increased employment may be short term. We would recommend the following rewording based on the suggested approach in the cited text: *Describe each project activity and the expected outputs, outcomes, and impacts of the activities. Explain how the activities will achieve the project's predicted climate, community and biodiversity benefits.* We also recommend adding the concept of "appropriate imprecision" in a footnote of the Standard. It is important to highlight that more data can always be gathered, but at some point, it does not add appreciable value to the planning or monitoring process and the project must	Suggestion is accepted to remove short term, medium term and long term and also to change sentence structure for clarity but 'causal relationships' retained since the use of a model for theory of change is important for demonstrating attribution of benefits to the project activities, as required by CCB Standards. Indicator changed to: *"Describe each project activity and the expected outputs, outcomes, and impacts of the activities., identifying the causal relationships that explain how the activities will achieve the project's predicted climate, community and biodiversity benefits".* The concept of 'appropriate imprecision' has been added in the footnote.

			prioritize its resources and efforts. This is identified in the Richards and Panfil text but does not appear in the Standard. Its inclusion should assist validation and verification bodies feel more comfortable in exercising professional judgment as to the level of subdivision within communities and in reviewing biodiversity data.	
1	0.15	G 1.9	Footnote 22 for G1.8: From "assessed" to "monitored" This change might make the meaning clearer. Another alternative is "measured," but it seems less appropriate here since not all projects interested in using CCBS are carbon project (thus, they may not "measure" to monitor the carbon benefit).	Suggestion accepted
3	0.16	G 1.10	In reviewing the CCB commented revision version, we understand that the footnote language "related to community participation in the project" is intended to mean risks that the community decides to not support the project in the future. This is not clear as written as risks to community participation could be taken to mean external pressures rather than the community's decision. We would recommend revising the footnote language to ensure greater clarity.	Accepted – Footnote changed to include the language 'risks related to community willingness to participate in the project'. , Risks to the projects climate, community and biodiversity benefits resulting from likely climate change and climate variability impacts is added as a risk that needs to be mentioned and mitigated.
8	0.17	G 2	Here and elsewhere in the document I preferred the old terminology of ' baseline' rather than 'without project' and this is also the terminology used by VCS. Should we express a preference for use of recognised tools for demonstrating additionality (e.g. VCS VT0001)?	We have attempted to keep the language simple throughout the new version of the CCB standards by avoiding technical terms. This is the reason we have used "without project" instead of baseline Footnote added for "additional" in concept: The most recent version of the following Verified Carbon Standard tool may be used (http://v-c-s.org/methodologies/VT0001) considering the following options: Sub-step 2b. – Option I. Apply simple cost analysis; or Step 3. Barrier analysis.

| 4 | 0.18 | G 3 : Concept | It might be useful to clarify what is meant by ALL communities! A 100% of those communities that are in any way affected by the project activities

Suggested change : Prior to the start of the project activities Aall Communities and Other Stakeholders have adequate information for full and effective participation, that includes effective prior consultations with all relevant stakeholders and participation, as appropriate, of those that want and need to be involved and that might by affected by the project activities. Feedback and grievance redress mechanisms are established and functional. Best practices are adopted for worker relations and safety

Justification: In our project we are in the middle of the preparations for the consultations. We realized that this is a very time-consuming and important part of the project. In the description of that part in the CCBS guidelines we missed more detailed descriptions of the process and we fear that this might in some projects lead to unfair processes, e.g. we heard of projects that invited some representatives of some of the affected communities to an event with some information about the project – and that was claimed to be the consultation. That is from our point of view not enough to guaranty a fair participation and thereby a long-term success of the project. The description leaves open when the information and consultation process has to be conducted. That is why we suggest to insert a "prior" in the text.

On "Access to information"In this part it is missing to whom of the communities the information has to be made accessible. The description in the footnote about effective consultation might be appropriate for the information | **On what is meant by All Communities:**

"All" is deleted. Communities is capitalized and refers to the definition outlined in G1.6: . **On inserting "prior"** : Concept has been changed to include the term "timely"

Concept to read (Based on suggestions 0.18 and 0.19): "All Communities and Other Stakeholders have timely and adequate information for full and effective participation .The project conducts that includes effective and timely consultations with all relevant stakeholders and participation, as appropriate, of those that want and need to be involved. and Feedback and grievance redress mechanisms are established and functional. Best practices are adopted for worker relations and safety.

On "access to information": G3.1, 3.2 and 3.3 mention to whom information has to be provided. Communities and Other Stakeholders are capitalized and refer to the definitions outlined in G 1.6: |

			process, too.	
6	0.19	G3 Concept	First sentence is awkward. Perhaps rephrase into two, as follows. "All Communities and Other Stakeholders have adequate information for full and effective participation. The project conducts effective consultations with all relevant stakeholders and includes participation, as appropriate, of those that want to be involved."	Suggestion accepted Concept to read (Based on suggestions 0.18 and 0.19): "All Communities and Other Stakeholders have timely and adequate information for full and effective participation .The project conducts that includes effective and timely consultations with all relevant stakeholders and participation, as appropriate, of those that want and need to be involved. Feedback and grievance redress mechanisms are established and functional. Best practices are adopted for worker relations and safety.
4	0.20	G 3.1	Suggested change: Describe how full project documentation1 has been made accessible to those Communities and Other Stakeholders that might be affected by the project activities, how summary project documentation (including how to access full documentation) has been actively disseminated to these Communities in relevant local or regional languages, and how widely publicized information meetings have been held with these Communities and Other Stakeholders Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely..	Proposed change not needed since Communities and Other Stakeholders are capitalized and refer to the definitions outlined in G 1.6:
5	0.21	G 3.1	Obviously we would like to be as transparent as possible, but much of our project documentation will be proprietary, particularly within peat swamp sites. How much of this is	It has been clarified in the footnote that the documentation being referred to are: project design documentation, project implementation reports and monitoring reports. The indicator also mentions

			expected to be made available in the public domain?	summary of these documents to be made available (with details on how to access full documentation). All of these documents will be in the public domain since they will be submitted via auditor to CCBA and then made public on the CCB Standards website.
4	0.22	G 3.2	Suggested change: Explain how relevant and adequate information about potential costs, risks and benefits to those Communities that might be affected by the project activities has been provided to them in a form they understand and in a timely manner prior to any decision they may be asked to make with respect to participation in the project. Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely.	Proposed change not needed since Communities is capitalized and refers to the definition outlined in G 1.6:
3	0.23	G 3.3	The verb tense here indicates that a project will have completed this step prior to submitting the project documentation to the VVB. In reality, the project documentation will only be able to include a general plan and the details will need to be developed in conjunction with the selected auditor based on their interview preferences and sampling plan. We recommend changing the verb tense to the future tense and perhaps adding a footnote indicating that some specifics will need to be identified once the audit begins.	The Standards document is meant as a guide for auditors doing validation/verification and not for preparation of the PDD. Thus the steps outlined only need to be completed prior to the audit visit.
4	0.24	G 3.3	Suggested change: Describe what specific steps have been taken, and communications methods used, to explain to those Communities and Other Stakeholders that might be affected by the project activities the process for validation and/or verification against the CCB	Communities is capitalized refers to the definition outlined in G 1.6:

			Standards by an independent auditor,2 providing them with timely information about the auditor's site visit and facilitating direct and independent communication between them and the auditor..	
			Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely.	
6	0.25	G 3.3	Footnote 34: should allude here to the auditor having to be approved by CCBA. Perhaps a second sentence saying "The auditor must be approved by the CCBA as defined in the Rules; a list of approved auditors can be found at xx".	Accepted and added to footnote 34
1	0.26	G 3.4	"project design and implementation"

The standards have been revised to be more suitable for verification by including language for verification in the indicator. Project proponent in the validation stage will also see this and have to address this, and language like this ("and implementation", which is applicable only to verification) is very confusing. Please edit it so that distinctions between issues for validation and verification can be made easily and clearly. This comments applies to other parts with the same problem.

*During verification, the focus is whether the project has been implemented per validated plan; i.e., the PDDs. It seems it is not too important to change the texts to make them more amenable to verification. | Suggestion accepted and footnotes are added:
Footnote 35: "influenced" : Applies to projects undertaking validation
Footnote 36: "implemented" : Applies to projects undertaking verification |

4	0.27	G 3.4	Suggested change: Document and defend how those Communities and Other Stakeholders that might be affected have influenced project…… A plan must be developed and implemented to continue communication and consultation between the project proponents and these Communities and Other Stakeholders about Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely..	Communities and Other Stakeholders are capitalized and refer to the definitions outlined in G 1.6
8	0.28	G 3.4	Suggest delete ' ..and defend...'	Suggestion accepted
1	0.29	G 3.5	Entire paragraph This seems relevant to verification only. Indicate it is so to avoid confusion or edit it to make it more suitable for validation.	Indicator changed to "Describe the measures needed and taken to enable……" to be in line with other similar indicators and in order to make it applicable to validation and verification.
4	0.30	G 3.5	Suggested change: Describe the measures taken to enable effective participation, as appropriate, of all Communities that want and need to be involved or might be affected by the project activities in project design Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely..	'and need' included. 'might be affected' not included for reasons explained in 0.27 above
3	0.31	G 3.6	If the project works with legitimate representatives of a group or community, the expectation is that the representative disseminates information and solicits feedback from the group, in line with the approved	It is important for the representation structures to make sure that information flows are maintained. This is an essential attribute of representation being "legitimate" and the Project Proponent should take

			processes of the group or community. Assuming that legitimacy of the representative is confirmed, it does not seem appropriate or culturally sensitive for the project to question whether adequate information is being conveyed to and among members of the group. Also, it would be extremely challenging for a project to gather sufficient evidence for a VVB to support this requirement unless the project were to request copies of every communication the representative made with his or her group, which again will convey a sense of distrust and is likely to antagonize the relationship between project and stakeholders. It should be sufficient for the project to demonstrate that they have used good faith effort to be as consultative as possible, within the normative processes of the region. We recommend deleting the "ensuring adequate levels of information sharing with and between members of the groups"	responsibility to ensure that Communities and Other Stakeholders are informed about issues for consultation. . Information sharing 'between' members of the groups is removed as this goes beyond the responsibility of the Project Proponent. Indicator changed to "Demonstrate that all consultations and participatory processes have been undertaken directly with Communities and Other Stakeholders or through legitimate representatives selected by the relevant groups, ensuring adequate levels of information sharing with the members of the groups."
4	0.32	G 3.6	Suggested change: Demonstrate that all consultations and participatory processes have been undertaken directly with those Communities and Other Stakeholders that might be affected by the project activities or through legitimate Justification: Does not indicate which communities or what percentage of communities. The suggested formulation could also be different. We only suggest to be more precisely..	Not adopted for reasons given in 0.27 above.
3	0.33	G 3.7	As noted in the March 2013 Workshop held in Washington, DC, there is great confusion among both project developers and VVBs on whether feedback and grievance systems are the same or different. To ensure clarity, we recommend the following change to the requirement language: "Formalize a clear process for receiving feedback from	Suggestion accepted. G 3.7 has been changed to: "Formalize a clear process for receiving feedback from Communities and Other Stakeholders throughout the project lifetime and *a clear process* for handling unresolved conflicts and grievances that arise during project planning,

			Communities and Other Stakeholders throughout the project lifetime and *a clear process* for handling unresolved conflicts and grievances that arise during project planning, implementation and evaluation."	implementation and evaluation..."
4	0.34	G 3.7	Suggested change: The project proponent must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within an by the conflicting parties agreed time frame, referring any unresolved grievances to an effective resolution process managed by a third party. Justification: To be more precise on between whom the agreement has to be.	There should be one agreed time frame and not different ones for each grievance decided by conflicting parties on a case-by-case basis. Indicator changed to :"….. The project proponent must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within a time frame agreed between the project and Communities/Other stakeholders, referring any unresolved grievances to an effective resolution process managed by a third party.
6	0.35	G 3.7	Is there a reason that there is no specific timeframe? When is the timeframe agreed, and between whom (assume the project & stakeholders, but is CCBA or the auditor involved?)? Is the suitability of timeframe difficult to audit unless it is more explicit?	The timeframe is to be decided between the project proponent and the stakeholders. Indicator clarified : "….. The project proponent must attempt to resolve all reasonable grievances raised, and provide a written response to grievances within a time frame agreed between the project and Communities/Other stakeholders, referring any unresolved grievances to an effective resolution process managed by a third party."
3	0.36	G 3.11	It would be helpful to add language indicating that the risks and best practices should be analyzed in a culturally sensitive manner and in light of the local and practical customary practices. Best practices should not be interpreted to mean conformance with OSHA requirements or the best practices of the VVB's home country. We	Suggestion accepted to add "in line with the culture and customary practices of the communities" to the end of the last sentence.

1			recommend either adding a footnote to this requirement or adding "in line with the culture and customary practices of the communities" to the end of the last sentence.	
5	0.37	G 4.3	"Document the financial health of the implementing organization(s) to demonstrate that financial capacity is adequate to implement the project." Question: Is this part of the public documentation?	This is documentation that needs to be audited and shared with the auditors. Confidential information need not be made public but the PDD needs to include some non-confidential information and a statement from the project proponent that can be assessed by the Auditor.
1	0.38	G 5	Swap first and second paragraphs. Have to make sure that the project is compliant first	Suggestion accepted
8	0.39	G 5.1	I do not think the Project Zone is the correct spatial frame here. Its either the Project Area (where the credits are sold from) or it should be the total area for all activities (currently its just defined by the climate and biodiversity activities – but one can imagine issues arising about community activities on lands outside the forest and so these should also be included in the consent and consultation process). This is an example of how things would be neater if the Project Zone was defined to include all the Community Activity Areas. Regarding comment p11 on page 3 of the previous version, I share the concern that consent may need to be withdrawn by some communities either for foreseeable reasons (e.g. project proponent fails to comply with commitments made) but also unforseeable ones (changes in other aspects fo community livelihoods). This seems inescapable - whatever contract was signed decades earlier, no buyer will want to be associated with a project where community support has collapsed. It should probably be dealt with in a risk management framework	It has been clarified that The Project Zone is defined as the area encompassing the Project Area in which project activities that directly affect land and associated resources, including activities such as those related to provision of alternate livelihoods and community development, are implemented.. It would therefore be important to consider all rights in this spatial area. While there may be Communities that live outside the project zone, project activities are not carried out there and therefore the project cannot be held accountable for preservation of rights in those areas.

			rather than trying to find ways to make the initial consent irrevocable.	
1	0.40	G 5.2	The footnote for this requirement references several documents and gives extensive guidance on free, prior and informed consent. While the referenced documents do discuss respecting the rights of non-contacted peoples, it would be very beneficial specifically to address non-contacted people in the footnote. We recommend adding: *"If non-contacted indigenous people are located or believed to be located in the project area, their right to remain in isolation should be respected in accordance with local, national and international laws and recommendations. While their presence does not preclude a project from being conducted in the area, the project should demonstrate that its activities are designed to further the protection of their rights and respect for their well-being.*	Suggestion accepted with removal of indigenous in case these people are not self-identified as indigenous. To add: *"If non-contacted peoples are located or believed to be located in the project area, their right to remain in isolation should be respected in accordance with local, national and international laws and recommendations. While their presence does not preclude a project from being conducted in the area, the project should demonstrate that its activities are designed to further the protection of their rights and respect for their well-being."*
4	0.41	G 5.2	Demonstrate with documented consultations and agreements that the project will not encroach uninvited on private property, community property,7 or government property and has obtained the free, prior, and informed consent8 of those whose property and customary9 rights will be affected Justification: We suggest to add "customary rights" in order to ensure that also the rights of indigenous people and ther communities that falls under the "property right" definition will be involved.	The definition of "property rights "(Footnote 38) to be modified to " statutory and customary tenure/use/access/management rights to lands, territories and resources"
3	0.42	G 5.3	In reviewing this requirement, it appears that the involuntary relocation of non-local people working for corporations conducting illegal activities in the project area	Suggestion accepted

			that have been operating for an extended period of time may also require compensation. It is our understanding that this is not the intent of CCB. We recommend adding language to the footnote for this requirement so that it reads "Restricting the evaluation to activities that comply with statutory laws or conform with customary rights *of the communities or individuals*."	
1	0.43	G 5.5	Change "last twenty years" back to "last ten years" Records may not be adequate to go that far back, particularly the conflicts are now resolved and no longer active. Understood that resolving conflicts takes time, but I do not see the point of requiring to identify resolved cases that far back in time. Ten years was the right threshold.	Indicator has been changed to "… during the last twenty years where such records exist, or at least during the last ten years.
3	0.44	G 5.5	We feel it would be helpful to add a footnote specifying that no unresolved disputes over land in the project area should be ongoing at the time that the project starts. Disputes over land in the project zone or other areas relevant to the project may be ongoing during the project lifetime and these are the disputes that the project should not attempt to unduly influence with its activities.	Suggestion has not been taken because: 1. In many cases disputes are one of the reasons to undertake the project and if the requirement that no disputes should exist at the start of the project is included, the standard would not allow for certain type of projects (e.g.) where project validation would act as an incentive for government to clarify tenure. 2. Conflict can rarely be avoided completely and in some cases may be positively transformative 3. The CCB Standards already requires projects to have in place mechanisms to manage both existing disputes and those arising during project period whether as a result of project interventions or from other sources but affecting the project.
5	0.45	G 5.5	We felt that documenting resolved disputes over the last 20 years may be too long a timescale, particularly in areas	This requirement is retained since conflicts have long term impacts. Indicator has been changed to "… during the last

			which have seen much unrest	twenty years where such records exist, or at least during the last ten years. .
1	0.46	G 5.6	Deleted part remain deleted Agree to delete the requirement regarding international treaties and agreements. They bind countries that are Parties, and countries implement them through domestic measures. Although good to know, they are not relevant to projects.	No action required
3	0.47	G 5.6	We recommend rewording to say "Submit a list of all national and local laws and regulations in the host country relevant to the project activities." The project should not be held responsible for identifying all laws applicable to any activity conducted by any group in the project zone and identifying how compliance is achieved for the other groups. Based on input offered during the March 2013 Workshop, there has been much confusion on this point in the past and it would be helpful to ensure clarity.	Suggestion accepted
1	0.48	G 5.9	Delete 'community or biodiversity,' or revert to old text. How can biodiversity and community benefits be double counted if there is no system of counting them?	This indicator attempts to extend the double counting review to water credits, biodiversity offsets. In order to clarify further, the indicator has been modified as follows: "Identify the tradable climate, social and biodiversity benefits of the project such as emissions reductions, water credits, etc., and specify how double counting will be avoided, particularly for emissions reductions offsets sold on the voluntary market and generated in a country participating in a compliance mechanism with

				an emissions cap. ."
3	0.49	G 5.9	In the annotated revision, CCB comments that this indicator wishes to extend the double counting review to water credits or other attributes. We recommend changing the requirement to read: "Identify the tradable climate, social and biodiversity attributes of the project such as emissions reductions, water credits, etc, and specify how double counting will be avoided, particularly when attributes will be sold or fall under a regional or national compliance system." This will help projects and buyers understand for example, that it is not double counting for multiple credit purchasers to cite the conservation co-benefits associated with the project activities.	Suggestion accepted. Indicator has been modified as follows: "Identify the tradable climate, social and biodiversity benefits of the project such as emissions reductions, water credits, etc., and specify how double counting will be avoided, particularly for emissions reductions offsets sold on the voluntary market and generated in a country participating in a compliance mechanism with an emissions cap."
Climate Section				
1	1.01	Concept	This section is not required for projects that have met the requirements of a recognized GHG Program. Should have a criterion that make sure project proponents have met these requirements. Some project proponents are interested in CCBS to demonstrate multiple benefits, not necessarily interested in carbon offsets. Can this statement expanded to provide for simplified methodology to fulfill the CL section if the project proponents establish that they are not interested and will not engage in carbon trading/offsets?	The requirements for eligibility for waiver of the climate section of CCB Standards due to use of a recognized GHG program will be outlined in the Rules for the use of CCB Standards The new formulation that climate section in the Standards is only to be used to demonstrate a project's net positive climate benefits and not for claiming GHG emissions reductions and removals units that may be used as offsets is to support projects that are interested in CCB Standards to demonstrate multiple benefits, and not necessarily interested in carbon offsets. Allowing the use of "defensible" methodologies will enable demonstration of net benefits.

3	1.02	Concept	Is it possible to demonstrate conformance with the climate gold level indicators if a project does not use this section because it is using another approach? If projects are able to use another approach and still provide evidence that they meet the requirements for the Climate gold level, it is important to add a footnote stating this.	The Gold Level for climate change adaptation GL1 can be used if the project is eligible for a waiver of the Climate Section CM1-4 because it meets the requirements of a recognized GHG program and meets all the other required criteria and indicators in the standard.
6	1.03	CL 4.1	Should relevant carbon pools be defined, or is it left to the auditor's discretion to confirm that the project has used good judgement here?	It is left to the auditors discretion
1	1.04	CL 4.2	Delete "on the internet" Should not make it a requirement to put the monitoring plan and results on the internet. This will demand the project proponents to make a webpage for it, which is additional burden if the projects do not plan to create one for some other objectives. Community members may not have access to the internet anyway. Making hardcopies readily accessible may be more important than putting them on the internet. If putting on the internet is still deemed important, the CCBA website should provide such space, with standardized uploading protocol, and this indicator should read e.g., "publicly available on the CCBA website, or elsewhere on the internet that the project proponent provide"	Suggestion accepted. Suggestion also accepted that CL 4.32, CM 4.3 and B 4.3 should be symmetric (See comments for CM 4.3 and B 4.3). Indicator changed to: "disseminate the monitoring plan and any results of monitoring undertaken in accordance with the monitoring plan , ensuring that they are made publicly available through appropriate means and summaries are communicated to the Communities and Other Stakeholders Footnote 58 is deleted.
Community Section				
1	2.01	CM 1.2	Change the reference to "Project Zone" to some other term/s Project Zone is not defined for Community. Understand that some geographic space must be specified here, but Project Zone is not appropriate here; why community HCV	Project Zone is where project activities are undertaken. Even if there are some communities that live outside the project zone, the project should not have to be responsible for HCV's there since it is highly unlikely that the project impacts HCV's in areas far away from where the project activities are carried out.

			should be identified in the area relevant to Biodiversity? In case the Project Zone includes only part of community HCV, adequate management may not be done. There is question of whether active management can be done in Project Zone where active project interventions (and probably permit for project intervention) occur within the Project Area.	
4	2.02	CM 1.2	I think it is confusing to say "critical", so my suggestion is to take this word out.	The footnote clarifies what critical ecosystem services are. This is a term used in the HCV concept – see http://www.hcvnetwork.org/
1	2.03	CM 1.3	Delete 'including the impact of likely changes all ecosystem services important to communities'. Community impacted may not be spatially connected to the project area. The change in ecosystem services such distant communities enjoy may not be caused by the project at all. Discussing all ecosystem services could be overly burdensome. At least, limit the reference to ecosystem services here to what is identified in CM1.2.a.	Indicator modified to "including the impacts of likely changes in all ecosystem services in the Project Zone identified as important to the Communities."
4	2.04	CM 1.3	Even though well being is defined, I think examples of well-being indicators should be provided here (as the definition is a bit vague). So "original well being conditions" should be followed by "such as..." I think it would be good to do the same in other parts of the text that refer to well-being.	Indicator modified to " ….well-being conditions such as social, economic, psychological, spiritual or medical state and other characteristics of communities" We would not like to be prescriptive to the extent of requiring specific metrics for each of these aspects of well-being.
4	2.05	CM 2: Concept	Suggested change: The project generates net positive impacts on the well-being of Communities over the project lifetime. It ensures that an appropriate impact-sharing mechanism was agreed upon by all participating communities and relevant stakeholders, and is established.	In the new version, equitable sharing of costs and benefits among community members and constituent groups, including benefit sharing mechanisms is addressed in the Community Gold Level GL2.

			The project maintains or enhances the High Conservation Values in the project zone that are of importance to the well-being of Communities Justification: In the second edition of the CCBS it was required that the project has to ensure that costs and benefits are equitably shared among community members and constituent groups during the project lifetime. The benefit (and cost) sharing is thereby left out. That is why we suggest to add a part.	In order to account for benefits to individual community groups, the concept changed as follows: "The project generates net positive impacts on the well-being of Communities and of the Community Groups within them over the project lifetime…"
1	2.06	CM 2.1	Delete 'including predicted and actual benefits, costs and risks' Footnote 74 covers this aspect better.	We have left that in the indicator to emphasize the need to take into account different aspects of "impacts"
8	2.07	CM 2.3	– this requires' no negative impact' on HCV but I would prefer ' maintain and enhance', as used for CM1(Indicator 2) on prev page, and as I also propose for the biodiversity HCVs. Little practical difference (same bottom line) but a different intent.	Enhance indicates an improvement and would be different from requiring no harm.
5	2.08	CM 3 : Concept	Concept. "Project activities at least 'do no harm' to the well-being of Other Stakeholders" Comment: It is clear that we need to work with communities to provide alternative livelihoods but it may seem overly ambitious or stringent to require no one to become worse off. It is pretty much impossible to make everybody better off, especially in the case where we are trying to stop illegal activities (it is also a question of how well-being is perceived – I may perceive myself as being better off by engaging in illegal activities and it will be close to impossible for someone to provide me with 'adequate' compensation for the income from an illegal activities. Also, does the well-being of (local) society take precedence over the well-being of single individuals or sub-groups.	CM3.3 says 'Demonstrate that the project activities do not result in net negative impacts for other stakeholders." This means that positive and negative impacts can be assessed across Other Stakeholders as a group and this indicator can be met if there is no net negative impact across the group as a whole rather than for each individual. We think this is a reasonable approach.

			Another question is whether a commercial operator who's planned land-use might be avoided by the project would be regarded an 'other stakeholder'. Undoubtedly a company and potentially employees would be worse off (commercially) if we were to restrict their, say logging or conversion activities. It's a question of where to draw the line and some clarification on the subject would be appreciated.	
1	2.09	CM 4.1	2nd sentence: Monitoring variables must be directly linked to the project's objectives ~~for Community Groups…and impacts identified in~~ and sensitive to the changes expected in the project's causal model… and delete the 3rd sentence all together. Avoid being too prescriptive. With edits to the second sentence, points in the third can be absorbed. Requirement for an evaluation by the affected Community Group seems too much. (although I am suggesting to delete the entire sentence) The phrase "predicted and actual benefits" could cause confusion. I think the former is for validation and the latter for verification, but putting them in one sentence can causes the documentation to be overly burdensome.	The indicator has been retained since it clarifies the role of monitoring in providing the linkages in the causal model. It is important for monitoring to also include feedback from the Community groups. A footnote clarifying expectations has been added : " For example, documented opportunity for feedback from communities and their community groups as part of a participatory rural appraisal, community meetings or some other process"
3	2.10	CM 4.1	These requirements may be interpreted by projects and VVBs to mean that a formal documented evaluation of each individual project impact from each community subgroup must be presented as evidence of conformance. Is this the intent of CCB? That seems untenable for projects with large numbers of communities or subgroups. Would communication of the project's projected impacts and monitoring results through posters, presentations or	Suggestion accepted and footnote added " For example, documented opportunity for feedback from communities and their community groups as part of a participatory rural appraisal, community meetings or some other process"

			other means, along with a documented opportunity for feedback from communities and their community groups as part of a participatory rural appraisal, community meetings or some other process be accepted as well? A footnote clarifying the expectations will ensure that the appropriate actions are taken and that both projects and VVBs have a common understanding of the requirement.	
8	2.11	CM 4.3	I suggest there is a requirement that not only are the results communicated to communities/other stakeholders, but that comments and feedback are solicited and addressed.	The issue of soliciting comments and feedback and addressing them is covered in G 3.7 (Feedback and grievance redress mechanism)
1	2.12	CM 4.3	Text as in CL4.2 and footnote 58 These two indicators (B 4.3 and cm 4.3) should maintain symmetry to CL section. My comments to CL4.2 above also apply to them as well.	Suggestion accepted that CL 4.2, CM 4.3 and B 4.3 should be symmetric. According the indicator to be changed for all three indicators to: "disseminate the monitoring plan and any results of monitoring undertaken in accordance with the monitoring plan , ensuring that they are made publicly available through appropriate means and summaries are communicated to the Communities and Other Stakeholders
8	2.13	GL 2	I have a serious concern with this section as it conflates two issues – community ownership and level of benefits. I think these merit separate and independent GL criteria, since as currently formulated a non community-led project that delivered exceptional benefits could not qualify (e.g. private lands, concessions, state protected areas). This will exclude whole classes of projects from gaining community gold level status, which WCS would be most uncomfortable with. 'GL2A' could address Community-led Projects and include Indicators 1, 8 and 9. I think this is a valuable outcome in its own right.	In order to ensure that community-led projects that deliver exceptional benefits are not excluded from the gold level we will have adopted an either or option in GL 2.1: GL 2.1 Demonstrate that Smallholders/Community Members or Communities either own or have management rights, statutory or customary, individually or collectively, to land in the Project Area. The Smallholders/Community Members or Communities have rights to claim that their activities will or did generate or cause the project's climate, community and biodiversity benefits OR Demonstrate that the project zone is in a low human

				development country OR in an administrative area of a medium or high human development country in which at least 50% of the population of that area is below the national poverty line.
			'GL2B' should be close to the concept of Exceptional Community Benefits in edition 2 of the Standards. It could include the other Indicators – i.e. 2-7.	

Biodiversity Section				
8	3.01	B1	I think it is the right decision not to include other ecosystem services in this standard. They bring a whole range of new measurement issues, and would add complexity to an already complex process.Most significantly I think it might muddy the waters with other parallel PES schemes that could address, for example, watershed benefits in their own right.	No change required
1	3.02	B 2.1	under the with-project scenario (as described in G1.7). It helps to make explicit link to the with-project scenario established elsewhere.	Change not made
8	3.03	B 2.3	I would vote for an aim to 'maintain and enhance HCVs', as this will be consistent with other sections and perhaps encourage drive inclusion of explicity pro-biodiversity actions in workplans, rather than simply avoidance of harm.	B1.2 and and CM1.2 require measures to maintain and enhance HCVs – so there is already an explicit requirement that this is an aim. However, it may be possible to demonstrate enhancement so the minimum requirement should be 'no harm'. For example, how can the project 'enhance' areas important for cultural identity?
8	3.04	B 2.6	GMOs should not be used to generate any project benefits (including livelihood benefits) – current wording only specifies GHGs emissions	Current wording for GMOs only specifies GHG emissions because some projects using agriculture for alternative livelihoods have made the case that it could be hard to implement effective projects without use of increasingly widespread GMO products.

8	3.05	B 4.1	. I think 'outputs, outcomes and impacts' should be 'activities, outcomes and impacts' to be consistent with G1.7 which is referenced.	Suggestion accepted
1	3.06	B 4.3	Text as in CL4.2 and footnote 58 These two indicators (B 4.3 and cm 4.3) should maintain symmetry to CL section. My comments to CL4.2 above also apply to them as well.	Suggestion that CL 4.32, CM 4.3 and B 4.3 should be symmetric is accepted Indicator changed to: "disseminate the monitoring plan and any results of monitoring undertaken in accordance with the monitoring plan , ensuring that they are made publicly available through appropriate means and summaries are communicated to the Communities and Other Stakeholders Footnote 58 is deleted.
8	3.07	B 4.3	I suggest there is a requirement that not only are the results communicated to communities/other stakeholders, but that comments and feedback are solicited and addressed.	The issue of soliciting comments and feedback and addressing them is covered in G 3.7 (Feedback and grievance redress mechanism)
3	3.08	B 2.1	An estimate of the changes cannot address actual changes. That would be a monitoring requirement. We recommend deleting the word "actual".	Actual changes can be estimated, since all measurement and monitoring will be based on sampling and other approaches that provide an estimate of actual change.
1	3.09	GL 3: Concept	Suggest rewording: The project contributes to protection or appropriate management of sites of global conservation significance, selected on the basis of the Key Biodiversity Area (KBA) framework of vulnerability and irreplaceability. In doing so, internationally recommended safeguards are applied. Improve the wording. The second part addresses the proper management issue, which should be part of the quality project design (this could even be included as part	'appropriate management' or 'proper management' is hard to define. This GL focuses on biodiversity benefits so it is appropriate that the aim should be conservation of biodiversity. 'selected on the basis of' is added to the current concept. Management and safeguards is added as a second sentence to the concept, in line with CBD.

			of mandatory criteria). Examples here include CBD decision X/33 and XI/19. Include indicators for safeguards and proper management What is missing in this criterion in the current form is to address the management and safeguards/good practice. CBD decision X/33 and XI/19 contains minimum sets of suitable considerations. They are particularly important for sites of biodiversity significance such as KBAs. They should be incorporated into the CCBS. Having project proponents address them will be much more meaningful than having them do population studies.	
8	3.10	GL 3	I feel Gold Standard should require more than simply protecting forest cover and carbon stocks in an area of importance for biodiversity, since other threats such as hunting and invasive species are often pervasive and ' empty forests' should not qualify for special praise. The project should take explicit measures to conserve the biodiversity that makes the area a KBA. Suggested revision of the concept (also tracked in the text): Projects include sites of global significance for biodiversity conservation based on the Key Biodiversity Area (KBA)	We propose an approach where 1) population trends may be assessed based on interviews with local people if a population status estimate is hard to obtain directly, 2) a causal model identified threats and conservation action, 3) monitoring demonstrates the effectiveness of these measures either by monitoring population trends and/or threats. 1. Describe recent population trends6 of each of the trigger species7 in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario.

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6 Where direct evidence is lacking, past trends can be determined from threat assessments, credible local reports etc. Projections of population trend should relate to the theory of change described in G1.7 and the threat assesments in B1.1.

7 In cases where more than three trigger species occur, it is allowable to focus population assessments (GL3.2), conservation measures (GL3.3) and monitoring (GL3.4) on at least three key species, each one being either (i) of relatively high global significance compared to others at the site; (ii) under relatively acute threat at the site; or (iii) a good indicator of the status of a broader suite of trigger species at the site.

framework of vulnerability and irreplaceability1 and systematically address all threats to the most significant elements of this biodiversity.

Indicators

Suggested redrafting of the last three indicators [NB they are numbered 2, 2, 3 in the draft] and their footnotes to simplify what I offered last time:

1. Describe recent population trends of each of the trigger species2 in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario 3.

2. Describe measures4 needed and taken to maintain or enhance the population status of each trigger species at the project location, and to reduce the threats to them.

2. Describe measures8 needed and taken to maintain or enhance the population status of each trigger species at the project location and to reduce the threats to them, based on the causal model that aims to understand the threats to trigger species and identify activities to address them.

3. Include indicators of the population trend of each trigger species and/or the threats to them in the monitoring plan and demonstrate the effectiveness of measures needed and taken to maintain or enhance the population status of trigger species.9

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1 'Key Biodiversity Areas' are sites of global significance for biodiversity conservation that satisfy criteria based on a framework of vulnerability and irreplaceability defined in terms of species and population threat levels as defined in 'Identification and Gap Analysis of Key Biodiversity Areas' (Langhammer et al. 2007). IUCN. https://cmsdata.iucn.org/downloads/pag_015.pdf

2 In cases where more than three trigger species occur, it is allowable to focus population assessments (GL3.2), conservation measures (GL3.3) and monitoring (GL3.4) on at least three key species, each one being either (i) of relatively high global significance compared to others at the site; (ii) under relatively acute threat at the site; or (iii) a good indicator of the status of a broader suite of trigger species at the site.

3 Where direct evidence is lacking, past trends can be determined from threat assessments, credible local reports etc. Projections of population trend should relate to the theory of change described in G1.7 and the threat assessments in B1.1.

4 Following good practice guidance for in-situ species management including active management measures and re-introduction, as appropriate, and consistent with any relevant existing species management plan.

8 Following good practice guidance for in-situ species management including active management measures and re-introduction, as appropriate, and consistent with any relevant existing species management plan.

9Population trends are best assessed from direct measures of changes in population size but reliable abundance or occupancy indices may also be used. Trend and threat data should be used routinely to review and update the theory of change.

			3. Include measurement of the population trend of each trigger species (including the threats to them) in the monitoring plan and demonstrate that the status of each population is maintained or enhanced as a result of project activities compared with the predicted trends under the without-project scenario.5 For the final criterion, I don't think it should be possible to get gold standard simply by monitoring threats, without any direct assessment of the species themselves, as was permitted in the previous draft.	
1	3.11	GL 3.1.	…and providing evidence, such as literature and field survey report, that the qualifying conditions are met The project proponents do not necessarily have to do the survey themselves, but they can use existing information as evidence. Dealing with endangered species—numbers are limited—they are difficult to document in (short) surveys reasonable for the project.	Suggestion accepted. A new footnote has been added: Where direct evidence is lacking, past trends can be determined from threat assessments, credible local reports etc. Projections of population trend should relate to the theory of change described in G1.7 and the threat assessments in B1.1.
1	3.12	GL 3.2	**Delete 3.2,3.3 and 3.4** Once a site has been identified as a KBA, the site as a whole is important and trigger species are no longer focus of conservation actions. Over-emphasis of individual trigger species in these indicators is not in line with the proper interpretation of KBAs as priority biodiversity areas. Besides, studies on population sizes and status is resource-intensive, but yet not directly lead to improved conservation outcome. Indicators demanding population	If the site is designated as KBA on the basis of trigger species then the project claiming Gold Level for Exceptional Biodiversity Benefits has a responsibility to monitor the status of those important elements of biodiversity and to reduce the threats to them.

5Population trends are best assessed from direct measures of changes in population size but reliable abundance or occupancy indices may also be used. Trend and threat data should be used routinely to review and update the theory of change.

			study should not be included	
3	3.13	GL 3.2	**Describe the population status of each of the trigger species in the Project Zone at the start of the project and describe the most likely changes under the without-project land use scenario.**	No change required
1	3.14	GL 3.3	**Delete 3.2, 3.3 and 3.4** Once a site has been identified as a KBA, the site as a whole is important and trigger species are no longer focus of conservation actions. Over-emphasis of individual trigger species in these indicators is not in line with the proper interpretation of KBAs as priority biodiversity areas. Besides, studies on population sizes and status is resource-intensive, but yet not directly lead to improved conservation outcome. Indicators demanding population study should not be included	If the site is designated as KBA on the basis of trigger species then the project claiming Gold Level for Exceptional Biodiversity Benefits has a responsibility to monitor the status of those important elements of biodiversity and to reduce the threats to them.
3	3.15	GL 3.3	Many of the initial CCB projects have met the current requirement for Gold Level Biodiversity. We do not feel that this means the criteria are too lax, but rather feel this is to be expected as many of the initial projects have been funded by conservation non-profits and foundations. These groups will focus on areas important for conservation, which are almost always located in known biodiversity hotspots that by their definition will include endangered or endemic species and high conservation values. This is a success of REDD and CCB, not a flaw. The revisions to these requirements seem inconsistent. GL3.1 requires a population status for trigger species. However, the footnote for GL 3.3 states, "Population status or even presence at the site may be hard to establish for	Assessment of population status has been changed to assessment of population trends, including from credible local sources.

			some species that are threatened, rare or cryptic, for example." A comprehensive population status is extremely expensive or even impossible for large project areas. For REDD projects that aim to conserve intact forest, a comprehensive analysis of all of the threats and drivers of deforestation and threats to the conservation targets is more important for developing an action plan than a population status for one to three species. This is reflected in the footnote for GL3.3 as well, when it says "Evidence that threats to the species are being addressed and/or suitable habitat is being maintained may be used to demonstrate that species population status are likely to be maintained or enhanced as a result of project activities." We recommend removing the requirement for developing a population	
1	3.16	GL 3.4	**Delete 3.2,3.3 and 3.4** Once a site has been identified as a KBA, the site as a whole is important and trigger species are no longer focus of conservation actions. Over-emphasis of individual trigger species in these indicators is not in line with the proper interpretation of KBAs as priority biodiversity areas. Besides, studies on population sizes and status is resource-intensive, but yet not directly lead to improved conservation outcome. Indicators demanding population study should not be included	If the site is designated as KBA on the basis of trigger species then the project claiming Gold Level for Exceptional Biodiversity Benefits has a responsibility to monitor the status of those important elements of biodiversity and to reduce the threats to them.