Considerations for revision from comments received on the Sustainable Landscapes Rating Tool November 2016-April 2017

Detailed comments were received from 14 reviewers in nine organizations and from participants of working group sessions at workshops in Tarapoto, San Martin in Peru on 25 January 2017 and in Brussels, Belgium 6-8 March 2017. Responses to comments that were included in a draft version of the tool by reviewers at the United States Government Department of State, EDF, DAR, CIFOR and workshop participants are provided alongside each comment in a 'track changes' revision of the draft tool 'Detailed revisions to draft Sustainable Landscapes Rating Tool May 2017' available for download at http://www.climate-standards.org/sustainable-landscapes-rating-tool/

This document provides responses to comments not inserted into the draft version of the tool from reviewers at EDF, WCS, Althelia, Mirova, WWF-UK, DAR and BMUB.

1. **Purpose and overall approach**

No	From	Date	Comment	Considerations for revision
1.1	EDF	11Jan17	It seems like the tool is trying to both rate and assess (per the description). I'd choose one or the other, however that might just be semantics.	Tool aims to provide information in a structured format and perform an assessment through a rating approach ABC, rather than binary pass-fail or a qualitative evaluation against some goal. Wikipedia definition of rating "A rating is the evaluation or assessment of something, in terms of quality (as with a critic rating a novel), quantity (as with an athlete being rated by his or her statistics), or some combination of both."
1.2	WCS	13Jan17	Jurisdictional programmes will vary in their focus and their scope. So a tool that aims to cover all eventualities needs to be generic. Nevertheless, the cover-all nature of the existing approach may be problematic. The risk is that the tool is too detailed to use in a rapid screening, but lacks the specificity needed for an example where the objectives of the scheme are already defined. In cases where an investor wants to screen potential sites for investment, the investor will have their own set of criteria weighted to what matters to them. So private sector players will likely want an earlier screening on some specific points before they have a definite initiative of scheme in mind. An	Important point. Propose to help the user to create a simplified version that is easy to fill in for initial screening. Encourage users to pick their key indicators from the list for initial screening. If they want to go deeper, could also select the indicators of most interest. Explain that the tool provides a checklist from which could identify most relevant indicators, and potentially adapt for own use. Help them to link with outcomes information on 'track record'. The full range of criteria is more interesting for governments – so they can ensure they are

				covering the full range of the type of issues investors are likely to be interested in and can provide the information in a structured easily accessible format.
			investor making an investment decision would only use this detailed an approach if a positive or a negative result changed their financial model.	
1.3	WCS	13Jan17	It seems likely that the tool will be most used by govts and civil society in a context where the objective is to evaluate progress with creating a landscape-level governance structure. It would be wise to ensure the focus is right for this group of end users and this purpose. The key is getting governments, funders, and civil society organizations engaged with govt to adopt it as a useful marker of progress.	This proposes a slightly different focus from initial aim of the tool to facilitate investment, shifting to helping governments and partners to assess progress towards 'effective' policies and governance. This is, of course, the underlying reason for investor interest. To demonstrate that we have identified the 'right' indicators it would be good for us to test ex-post on successful SL initiatives, to see if the selected criteria were critical (ie higher rating for more successful jurisdictions)
1.4	Althelia	28Feb17	I think for a fund like ours we'd use it in early screening to highlight areas for deeper investigation and for things like labour where we may need to go beyond the law (if it is poor). - We'd need it to be up to date (2 years is probably realistic), and have a report + links to where we can find more info on each section	Private sector wants a quick way to find if laws are weak and/or not applied in sector interested in. Sounds like they would want others to keep it up to date Would they trust information provided by government?
1.5	Mirova	20Mar17	I liked the Sustainable Landscapes Rating Tool that you presented, and I definitely think it could be the kind of tool that we would use at Mirova when making initial assessments of potential investment projects.	Positive feedback about usefulness from investment fund
1.6	WWF-UK	11Apr17	I have considered its application to the jurisdictional spatial planning work that we are supporting. There have been some significant difficulties with the implementation of land use planning. I am asking myself the question, if we had known then what we know now, would we have gone ahead with our plans to influence Spatial planning? This is with a view to taking decisions about what landscapes to potentially add to WWF-UK's portfolio of target landscapes in preparation for a	Interesting application to help guide NGO investments in a landscape. Not looking for financial return but biodiversity benefits. Follow up discussion suggested commodity production system indicators would only be relevant for a few landscapes in their portfolio.

			forthcoming strategy review to determine which additional landscapes we might work in, using a systematic basis for selection. Decision to go ahead in these places was determined by the presence of our biodiversity priorities in these areas and the revisions to the structure of local government ///and the legislation for spatial planning. At the time this looked like an opportunity. In hindsight, the turbulence in local government appears to have meant that while open to influence, capacity to execute was weak. The demand for a systematic and global decision on priorities (rather than ad hoc selection of additional landscapes) is coming from our International Programmes Director. This systematic selection is what I would envisage using the tool for.	
1.7	WWF-UK	11Apr17	Despite working for some time on some of the UK-funded landscapes I do not have access to the data to answer many of the questions in the survey instrument and I think that some of the questions could only be answered if there was an in-country workshop (and project) to gather the data needed to answer the questions put. There is a question in my mind about how to fund and execute this feasibility assessment without raising expectations among potential recipients. I wonder if a coarser initial assessment might be useful. We currently have around 18-20 priority landscapes in our portfolio and the number to be added is not yet determined.	Would be useful to have a coarser/simpler screening tool to start with. They could develop their own using some of the SL Rating Tool criteria and others of importance to them.
1.8	WWF-UK	11Apr17	Do you have any historic cases on which you could test the tool, and see if you know what you now know would you have gone ahead with the landscape project in the jurisdiction in question? One could also look ex post at celebrated landscape and catchment projects such as those featured in the World Bank Landscapes Approach training course, such as the Loess Plateau, Korean reforestation, Luangwa valley and other cases. Perhaps you did something like this to establish the criteria for the tool?	Maybe a good idea to invest in this approach – conducting an assessment of jurisdictions with 'successful' sustainable landscape initiatives

1.9	WWF-UK	14Apr17	This type of tool could be very helpful for watershed management, or coastal zones, but would need adapting	Consider other versions of the tool as follow up development. Although the current tool is most focused on forest landscapes, clearly looks at governance beyond forest areas so is more relevant for landscape approach than PROFOR governance tool

2. Structure

No	From	Date	Comment	Consideration for revision
2.1	WCS	13Jan17	The tool contains most of the elements necessary for an analysis of each case, but different sections will be more or less important depending on the context. An alternative approach might be to develop the criteria as separate modules. The user could chose the modules that fit depending on their particular agenda. That way, CCBA could add specificity to the offer without the tool becoming cumbersome for those who only need part of the picture.	Good idea – develop as optional modules
2.2	DAR	7Feb17	It is important to define whether to take into account evidence that comes from the national regulatory and / or institutional framework. - It would be good to analyze the regulatory and institutional framework that applies directly to the issues raised in the tool. There are some inaccuracies because sometimes the criteria and indicators do not respond to what is required at the normative or institutional level in the country or region.	Explain that justification needs to clarify what is relevant from national level frameworks and anything different at sub-national level. User also needs to explain which framework the rating applies to – national policy or law, or sun-national.
2.3	Althelia	28Feb17	- I got the feeling that for a lot of the sections, it would actually be national level data (laws mainly), so in the report you should highlight what actually varies at the national level. Or maybe do a national assessment first, then note what changes at the landscape level. Brazil and Indo are examples where the states are bigger, but in many countries you won't get much legal difference.	Could Create a column for national assessment then add any variation at state/province level?

2.4	Althelia	28Feb17	- I presume there would be a report with details and links to info in it – that would be useful. More so that any rating, since any rating is somewhat arbitrary, what matters for us is always the detail in how it applies to one particaulr site we want to invest in.	Important to keep the detailed justification and evidence linked to a summary overview.
2.5	Mirova	20Mar17	• Star charts to present summary: only a visual aid, but could help give a quick overview of the major categories. (gave example of spider chart)	Would need to present status against some maximum. Not clear what this would be. Better suited to status against SL initiative goals – as for LAF

3. Issues to address - content

No	From	Date	type	Comment	Considerations for revision
3.01	EDF	11Jan17	General	Did you make sure that all necessary elements from UNFCCC, FCPF and VCS JNR were incorporated?	Will do check.
3.02	WCS	13Jan17	General	The checklist does not currently contain much on the feasibility of financial investment in the landscape. There are indicators on the general level of governance and transparency, but investors would probably require more examination of the commodity buyers operating in the area and their track record with accessing and repaying finance.	Goes beyond the policy and governance scope of this tool. Maybe Forest Landscape Investability Tool will cover this?
3.03	WCS	13Jan17	General	[For use by govts and partners on progress with establishing effective policy and governance for landscapes] - would probably require a section on the process of setting and agreeing objectives • Is the objective of the initiative clear? (i.e. zero defor, REDD+, commodity certification to an existing scheme, etc) • Has there been an analysis of the actors that need to be involved? • Is there clear adhesion of the key actors (including commodity buyers and potential market sources for produce)? • How is this adhesion binding (what sanctions are possible for non-respect or rules etc)?	Objectives of the a sustainable landscape/jurisdiction added in new 1.5 Identification of actors that need to be involved is covered in 4.2.1. adhesion of key actors is hard to assess – except maybe in their involvement in a multi-stakeholder platform 4.3.1. Sanctions?

3.04	Althelia	28Feb17	General	- It would be good to see in the report what the trajectory and progress has been. E.g. if a baseline carbon study has not been done, but is in progress that's good to know.	Add column in detailed evaluation for expected progress to change rating
3.05	Mirova	20Mar17	General	• High-level national information: I know this is a sub-national tool, but it would be easy/useful to add some national index indicators at the top of the summary sheet like ease of doing business, corruption, country risk rating, as these will still apply (and might not be available at sub-national level)	This can be done, and probably important for corruption especially where sub-national info requires more data, Idea from WWF - if they can justify a better score than national then would need to provide /evidence
3.06	Mirova	20Mar17	General	• Add some charts on trends: As it's currently just lots of coloured boxes, more just for a quick visual snap-shot, 10/20 year trends on e.g. agriculture sector growth, deforestation, could be interesting	We could add trends on policy/governance (per Althelia comment) but not suited to give deforestation, ag sector growth as these covered in LAF etc
3.07	WCS	13Jan17	General and 1. Land Use Planning and management	elements that concern the presence and capacity of the actors is critical. There are good criteria about governance and transparency, ability of government to manage and disperse funds. But these could be refocused specifically to assess the government's capacity to carry a scheme… particularly the monitoring and enforcement components. This section could include the existing elements on land use planning, but would also need some indication of buy-in from the stakeholders to the plan, and the governments capacity to enforce it. The same applies to the questions about the availability of data on deforestation, and on MRV. Data always exists somewhere, but often the government capacity to use the data for enforcement and monitoring is lacking. So questions about roles, the available capacity of those who will have the responsibility to drive compliance are important. The tool probably requires something explicit on the government capacity pay for actions. There are places in	Government capacity to manage and disperse funds? Is this really needed? Maybe budget of the land use planning and management agencies would be interesting? Capacity and resources of Govt to implement land use planning and mgmt. covered in 1.4.2. Changes this to 1.4.2 on financial and other resources for implementation and 1.4.3 on demonstrated capacity for enforcement, and non-compliance leading to penalties.

				the tool where it talks about to oversight and monitoring but it would reveal a great deal if the tool asked about the financial wherewithal of the key actor (i.e. the national or jurisdictional government).	
3.08	Althelia	28Feb17	General	- It would be good to have some things in about climate change adaptation / impacts	Add to 1.5.4 potential for growth requirement to consider potential impacts of climate change for a production system to get A rating
3.09	WCS	13Jan17	General and 3. Biodiversity	One of the most promising features of landscape initiatives is that they offer a way to channel part of the benefits from 'sustainable production' back into the protection of environmental values. The checklist could be reinforced with the addition of some elements related to this: e.g. Mechanism of benefit sharing that ensures a % of benefits to protected area maintenance (i.e. from 'produce and protect')	Not sure how benefits of production would feed back to protection? Through increase in govt budget?
3.10	EDF	11Jan17	1.Land use planning /mgmt	There should be a question about the results of the program, e.g. whether emissions have been reduced below the baseline. Section 1.5 should make it explicit that this spatial analysis refers to a historical baseline, including all significant activities and pools (instead of "including deforestation if appropriate")	Emissions have been reduced below the baseline is an outcome indicator – not policy and governance. Add based on historical changes to optional REDD+ section in 1.6
3.11	WWF-UK	11Apr17	1.Landuse planning and management	Some of the factors that seem to me to be informally influencing landscape selection at early stages in the process are: Monitoring of biodiversity planned to go ahead in proposed region (so that we can demonstrate the degree to which we are achieving our biodiversity objectives through landscape engagement (e.g. Sabah).	Add biodiversity to 1.9 monitoring and reporting systems

3.12	WWF-UK	11Apr17	1.Landuse planning and management	What I quickly noticed in reviewing the assessment sheet is that in Peru you were not able to obtain sufficient data on criterion 1.4.3, the question of corruption in land use decisions. The presence of corruption in land use planning contract awards has been a key reason why spatial planning in one Kenya county has not proceeded. This raises the question in my mind of the weighting of the criteria. As of now, we could have scored highly on many other criteria but still failed overall because corruption prevented progress. In practice many other aspects were missing but these are not things that have prevented the work from proceeding. This raises the question for me as to the weighting of the responses and whether there are some killer criteria that should have very high weighting in determining whether or not to proceed with a particular project.	Add national transparency international corruption index rating which does focus on corruption of public institutions even though this is not specific to land use authorisations at sub-national scale. TI index is actually a composite of corruption scores from asking experts in other surveys eg Economist Intelligence Unit, World Bank. Provide method for approach to ask experts and would need to provide evidence if rating is better than national.
3.13	WWF-UK	11Apr17	1.Landuse planning and management	Questions seem quite heavily focused on deforestation and degradation reflecting the history of REDD+ in landscapes work. This does not necessarily apply to the grassland parts of the landscape. It also does not apply to freshwater catchments.	Consider applicability to non-forested landscapes
3.14	BMUB	22Feb17	1.5 data and spatial analysis of land use change	Regarding 1.5: Corporations have interest that monitoring is provided by governments, in many cases gov. struggle with embedding projects in their benefit sharing, decentralizing information and sharing it publicly, also the periodicity, resolution and quality of information needed might be different. What is needed is an agreement with key stakeholders in the jurisdiction how data is provided.	Unclear how to add clarity on periodicity, resolution and quality of data in 1.6
3.15	BMUB	22Feb17	2.Land and Resource Tenure	Regarding 2: Clarity on land rights as prerequisite for investments is important, making access to credits, incentives conditional upon compliance with environmental goals has proven to be successful, might be helpful to rethink the chapter from an investors perspective	What do investors need to know about clarity of land rights, beyond what is already covered?

3.16	Althelia	28Feb17	4. Stakeholder participation and 5. Commodity production systems	- Have a think about which criteria would be better in the commodities section. E.g. child labour may be prevalent in some value chains but not others. - It would be good to have some things in about climate change adaptation / impacts	Good suggestion –move the questions about prevalence of child/forced labour 4.6.4 and 4.6.5 to section 5 - Add climate change impacts to 5.1.4 data available on potential for growth
3.17	EDF	11Jan17	5.Commodity production systems	The thematic criteria I think are the correct ones and I like that production is included (addresses the leakage and livelihood questions). However in the production theme, I think you need an indicator of whether production is increasing/unit of land to indirectly get at the leakage and livelihood questions. It isn't there at the moment and 5.1.3 might be the metric to modify to capture it.	5.1.2 asks if Data is available on productivity (ie yield/ha). Whether it is increasing would be an outcome measure provided in another place – eg LAF
3.18	EDF	11Jan17	5.Commodity production systems	5.1.5 - I'd pull whether a certain percentage of production is certified or not as a criterion. The jurisdictional approach's purpose is to be more inclusive than the certification allows for.	Difficult data to find. Should be % of land under production that is certified not % of total production or producers. Propose dropping this indicator.
3.19	BMUB	22Feb17	5.Commodity production systems	Regarding 5: Commodity production system should include the timeframe of returns (forest has to be combined with agriculture to make it more lucrative also in the short term) and the climate sensitiveness/resilience (coffee is sensitive to CC, corporations willing to invest more demanding also policy changes); existence of decentralized finance providers or co-funding from PES or REDD + might be important criteria.	Add in 5.1.4 data and analysis on potential for growth in adoption of sustainable practices • investment needed to increase productivity using sustainable practices? • In what time frame? • Climate sensitivity of production system? Existence of decentralized finance providers/co-funding? Covered in 5.1.7
3.20	Mirova	20Mar17	5.Commodity production systems	• More commodity info: for major commodities, as well as just saying 'data on productivity is available', you could present the data. For major commodities, it might be possible to present e.g. jurisdictional average cocoa yields against national and regional yields. This could give you a quick idea of potential for growth	This is straying into the outcome/track record piece but Maybe could add jurisdictional average and comparison with national average?

3.21	Mirova	20Mar17	5.Commodity production systems	There is a question in my mind about how the results with respect to different criteria are weighted in any particular decision on whether or not to go ahead and invest in a particular landscape.	No weighting currently

4. Guidance and accompanying materials

No	From	Date	Comment	Considerations for revision
4.1	EDF	11Jan17	It would be good to provide a methodology for how these questions were chosen. What were your sources for these questions?	Background doc
4.2	DAR	7Feb17	- It is important to have definitions for some terms that can be understood in different ways by respondents (for example, generate a glossary of terms).	Add definitions to a supporting document