

11 July 2017

## Call for Public Input

### Hydropower sustainability assessments

#### 1 INTRODUCTION AND BACKGROUND

Hydropower projects have the potential to reduce greenhouse gas (GHG) emissions, but if not properly designed, can result in unacceptable environmental and socio-economic impacts. Accordingly, VCS believes that only those hydropower projects which demonstrate appropriate consideration of and address these impacts should be eligible under the VCS Program. To this end, VCS is considering revising its rules to require hydropower projects to perform a 'hydro-specific' sustainability assessment, and is issuing this call for public input to receive feedback on our proposal for doing so.

Specifically, VCS is proposing that all hydropower projects be required to perform an assessment against the [Hydropower Sustainability Assessment Protocol](#), which is a tool that provides a means to assess performance across a number of sustainability topics particularly relevant for hydropower projects. The protocol scores projects against each sustainability topic, though it does not set any particular scoring threshold for "passing". VCS' proposed update to its rules, as detailed in Section 2 below, includes scoring thresholds which projects would be required to meet to be eligible under the VCS Program.

VCS believes that this 'hydro-specific' sustainability assessment is necessary given the unique sustainability challenges faced by hydropower projects, and is a sensible approach for two main reasons. First, the Hydropower Sustainability Assessment Protocol includes a structured and auditable set of criteria against which projects are assessed, which provides a more consistent basis of assessment than other high-level criteria (such as those included in the World Commission on Dams report). Second, it permits all hydropower projects the opportunity to demonstrate that they have properly considered and/or addressed any negative impacts, which is a more equitable approach than basing eligibility on arbitrary distinctions of project size.

VCS is issuing this call for public input to receive feedback on the proposed update to the VCS rules set out in Section 2 and to receive any other comments or suggestions stakeholders may have. Section 3 includes instructions for submitting comments and other details about the consultation process.



## 2 PROPOSED UPDATE TO VCS RULES

VCS proposes updating Section 3.17 of the [VCS Standard](#) as follows (updates shown in red text):

### 3.17 SAFEGUARDS

#### No Net Harm

**3.17.1** The project proponent shall identify.....

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#### Hydropower Projects

**3.17.9** Hydropower projects shall conduct an official assessment against the *Hydropower Sustainability Assessment Protocol* (HSAP)<sup>1</sup> at validation and at each project crediting period renewal. The purpose of this assessment is to ensure that projects appropriately address the unique environmental and socio-economic impacts that hydropower projects may have.

**3.17.10** The project proponent shall apply the HSAP assessment tool relevant for the stage of the project life cycle. The final assessment report shall be made publicly available.

**3.17.11** The final assessment report shall:

- a) Not indicate a score of less than two (2) for any HSAP topic.
- b) Not indicate a score of two (2) for more than two HSAP topics.
- c) Indicate an average score of four (4) across all scored HSAP topics.

Failing any of the above criteria, the project shall not be eligible for registration with the VCS Program.

## 3 PROCESS FOR CALL FOR PUBLIC INPUT

The call for public input is open from 11 July to 8 September 2017. All comments should be sent to Sam Hoffer, CCB & VCS Program Manager, at [shoffer@v-c-s.org](mailto:shoffer@v-c-s.org). Following the closure of the call for public input, VCS will publish a synopsis of comments received, but will not publish individual comments for the sake of confidentiality. VCS will take due account of all comments received, and may subsequently draft revisions to the VCS rules.

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<sup>1</sup> The *Hydropower Sustainability Assessment Protocol* and information on the process for conducting official assessments can be accessed at: <http://www.hydrosustainability.org/>.