Climate, Community & Biodiversity Program Update
Public Comment Report

2 February 2017

1 PURPOSE

This report documents all comments received during the Climate, Community & Biodiversity (CCB) Program Update Public Comment Period. Where appropriate, VCS's response to comments is provided. The public comment period was open from 7 November 2016 – 6 January 2017 for comment on the following documents:

- Update to the *Climate, Community & Biodiversity Standards*
- Update to the *Rules for the Use of the Climate, Community & Biodiversity Standards*
- A new *CCB Project Design Document Template*
- A new *CCB Project Implementation Report Template*

2 RESPONSE TYPES

Responses were requested in two different ways: open feedback and ratings and comments related to statements in a questionnaire-style form. The open feedback section addresses any general feedback or comments received by VCS during the public comment period. The *section*, *text* and *comment* columns have not been altered from what was received from the commenter.

The questionnaire responses include the statement to which commenters responded, an average of the ratings of each statement, and any comments or negative ratings. The rating scale was as follows: 1 = Strongly Disagree; 2 = Disagree; 3 = Neutral; 4 = Agree; 5 = Strongly Agree.

3 INPUT ON CHANGES PROPOSED FOR THE CLIMATE, COMMUNITY & BIODIVERSITY STANDARDS V3.1

Open Responses					
Commenter	Comment #	Section	Text	Comment	VCS Response
901	1	G1.12		I would include in 12 a request to explicit risk analysis of financial mechanism adopted in order to support better the claims on project permanence.	No change made as we are not proposing to change the content of the indicators of the *CCB Standards Third Edition* in this update. We will take your comment into further consideration for a future program update.

Questionnaire Responses	
Statement 1: The section order of the document makes sense.	Average rating = Agree (4.33)
Comments and negative ratings	VCS Response
Yes	This comment was understood to be a positive response.
Statement 2: The *Standards* are easy to navigate.	Average rating = Agree (4.33)
Comments and negative ratings	VCS Response
I found the standards structure and sequence appropriate and easy to navigate	No change required
Yes	This comment was understood to be a positive response.
Statement 3: VCS's role in governing the CCB Program is clear to me	Average rating = Agree (4.33)
Comments and negative ratings	VCS Response
Yes	This comment was understood to be a positive response.
Statement 4: I will find the CCB Program easier to use alongside the VCS Program than it was before due to the changes to eliminate conflicting terms.	Average rating = Agree (3.67)
No comments or negative ratings	

4 INPUT ON CHANGES PROPOSED FOR THE RULES FOR THE USE OF THE CLIMATE, COMMUNITY & BIODIVERSITY STANDARDS V3.1

Open Responses					
Commenter	Comment #	Section	Text	Comment	VCS Response
854	1	5.2.3	Validation/Verification Body Rotation	I think this is a very good change, thank you.	No change required
583	2	5.2.3	Rotation of validation/verification bodies is required in respect of validation and verification	The Conservation Fund appreciates the rigorous intent of this requirement, however the required change of auditors will likely add significant cost to the verification process.	VCS acknowledges that this change will have more impact on projects that verify less frequently.
180	3	5.2.3	Rotation of validation/verification bodies	I strongly disagree with the requirement to change validation/verification bodies. It undermines the work that the body has done to serve clients with rigorous, yet timely, audits. It also implies that you don't trust auditors to be objective and professional. More importantly, it undermines any faith you have in the accreditation process for certification bodies.	This program update is not introducing a new requirement for the periodic rotation of validation/verification bodies, but rather is changing the existing requirement to align with VCS Program requirements for rotation of validation/verification bodies. We did not intend to demonstrate any more or less trust in validation/verification bodies through this change. In some cases validation/verification bodies will be able to perform more repeat audits than allowed under *Rules* v3.0. This change will not have any impact on the validation/verification body accreditation process.

854	4	3.4(B)	Requirements Documents	I think the fixed CCB fee disproportionately impacts smaller projects	Changes to the *CCB Program Fee Schedule* are not proposed in this update. However, we will keep this input on record.

Questionnaire Responses	
Statement 1: The section order of the document makes sense.	Average rating = Agree (4.25)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 2: The language used is easy to understand.	Average rating = Agree (4.25)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 3: The *Rules* are easy to navigate.	Average rating = Agree (4.00)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 4: The section order of the document makes sense.	Average rating = Agree (4.00)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 5: The section order of the document makes sense.	Average rating = Agree (3.50)
Comments and negative ratings	VCS Response
I work primarily with just the CCB Program	No change required

5 INPUT ON CHANGES PROPOSED FOR THE CCB PROJECT DESIGN DOCUMENT TEMPLATE V3.0

Commenter	Comment #	Section	Text	Comment	VCS Response
			Open Responses		
901	1	4.5.1	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 households within the communities are below the national poverty line.	Not sure how is this related with the exceptional community criteria. I suggest to explain how/why this criteria and threshold is in line with exceptional community benefits	The text in question is pulled directly from the *CCB Standards* section on exceptional community benefits (see criteria 1 of GL2), and changes to the criteria and indicators of the *CCB Standards* are not part of the revisions proposed in this update.
901	2	5.2.1	Biodiversity Element	I suggest to use the term Biodiversity entity instead of element	The suggestion has been considered but there is a concern that using the term "biodiversity entity" will be misinterpreted as "biodiversity species", which is not the intent of the *Standards* or template. The term biodiversity element will remain.
271	3	1.2	Summary of Project Benefits	In the SPB, instead of stating 'no data', perhaps 'not applicable' would be more appropriate, as the former might be interpreted as being a shortcoming of the project (i.e. that the project failed to monitor that aspect)	Changed phrasing to "data not available" to provide some ambiguity about why the metric is applicable to a project, but data was not included in the report. The phrase was not changed to "not applicable", per your suggestion, as this term is included in the SPB section with a different meaning.

Questionnaire Responses	
Statement 1: The section order of the document makes sense.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 2: The language used is easy to understand.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 3: The language and formatting are consistent with VCS Program documents.	Average rating = Neutral (3)
Comments and negative ratings	VCS Response
Why use PDD instead of PD?	The term Project Design Document (PDD) better describes the intended use of this document - as a documentation of the project's design - than the (VCS) term Project Description (PD).
Statement 4: The instructions on the cover page are clear to understand.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 5: The heading styles and colors in the body of the template aid in navigating the document.	Average rating = Agree (3.67)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 6: The instructions in the body of the template are easy to understand.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 7: The references to the specific section of the CCB Standards are helpful in understanding what information is required.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 8: The tables in the body of the template are useful.	Average rating = Agree (3.67)
Comments and negative ratings	VCS Response
Rating of 2	The desired outcome from the use of the tables is shorter and more focused information provided. As the average rating to the tables is positive no change will be made.
Statement 9: The tables in the appendices of the template are useful.	Average rating = Agree (3.67)

Comments and negative ratings	VCS Response
Rating of 2	As the tables in the appendices are optional and the average rating to the statement is positive, no change will be made.

Statement 10: The new template will make the creating of the PDD easier.	Average rating = Neutral (3.33)
Comments and negative ratings	**VCS Response**
Rating of 1: I do not think you should mandate a specific template.	The purpose of introducing the templates is to aid new project proponents in creating documentation and make reporting more consistent, thereby reducing costs for validation/verification bodies and VCS and making project documentation more accessible to all stakeholders. In order to ensure the templates are widely adopted, they need to be mandatory.

Statement 11: The new template is too structured and will make the PDD more cumbersome to write.	Average rating = Neutral (3)
Comments and negative ratings	**VCS Response**
Rating of 5: I do not think you should mandate a specific template.	See VCS response to statement 10.

Statement 12: It would be helpful to allow the combination of all of the sections of the monitoring report design into one section of the PDD.	Average rating = Disagree (2.33)
Comments and negative ratings	**VCS Response**
Rating of 1: Having the monitoring report design per section Climate, Community and Biodiversity makes easier to link with actions proponents design for each section.	The comments and average rating have been taken into account and the monitoring report design sections will remain, as proposed, in the climate, community and biodiversity sections, respectively.

6 INPUT ON CHANGES PROPOSED FOR THE CCB PROJECT IMPLEMENTATION REPORT TEMPLATE V3.0

Open Responses
No comments received

Questionnaire Responses	
Statement 1: The section order of the document makes sense.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings or comments	
Statement 2: The language used is easy to understand.	Average rating = Agree (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 3: The language and formatting are consistent with VCS Program documents.	Average rating = Neutral (3)
Comments and negative ratings	VCS Response
Rating of 2	The new template strives to be consistent with the VCS Program but must still serve as a guide for program documentation that meets the requirements of the CCB Standards. With no further specific comment, no change will be made.
Statement 4: The instructions on the cover page are clear to understand.	Average rating = (4)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 5: The heading styles and colors in the body of the template aid in navigating the document.	Average rating = Agree (3.67)
Comments and negative ratings	VCS Response
No comments or negative ratings	
Statement 6: The instructions in the body of the template are easy to understand.	Average rating = Agree (4)
Comments and negative ratings	Response
No comments or negative ratings	
Statement 7: The references to the specific section of the CCB Standards are helpful in understanding what information is required.	Average rating = Agree (3.67)
Comments and negative ratings	Response

No comments or negative ratings	

Statement 8: The tables in the body of the template are useful.	Average rating = Agree (3.67)
Comments and negative ratings	Response
Rating of 2	The desired outcome from the use of the tables is shorter and more focused information provided. As the average rating to the tables is positive no change will be made.

Statement 9: The tables in the appendices of the template are useful.	Average rating = Agree (3.67)
Comments and negative ratings	Response
Rating of 2	As the tables in the appendices are optional and the average rating to the statement is positive no change will be made.

Statement 10: The new template will make the creating of the PDD easier.	Average rating = Neutral (3.33)
Comments and negative ratings	Response
Rating of 1: I do not think you should mandate a specific template.	The purpose of introducing the templates is to aid new project proponents in creating documentation and make reporting more consistent, thereby reducing costs for validation/verification bodies and VCS and making project documentation more accessible to all stakeholders. In order to ensure the templates are widely adopted, they need to be mandatory.

Statement 11: The new template is too structured and will make the PDD more cumbersome to write.	Average rating = Neutral (3)
Comments and negative ratings	Response
Rating of 5: I do not think you should mandate a specific template.	See VCS response to statement 10.

Statement 12: It would be helpful to allow the combination of all of the sections of the monitoring report results into one section of the PIR.	Average rating = Neutral (3.33)
Comments and negative ratings	Response
No comments or negative ratings	The average neutral rating was noted. Taking into account the response to the corresponding statement (12) about the *CCB Project Design Document Template*, we have not altered the template.