

Comment Reference #	Section	Issue Raised by Commenter	Commenter Proposal	Verra Response
0_8644	0 Note to Reviewers	<p>My general feedback is that the document is extremely detailed, long and could thus appear a bit constraining. It is not user-friendly except to very experimented practitioners. However, its highly detailed and diversified content related to assessment/evaluation methods makes it, in some extent a pedagogical tool enabling users to meet the needs of SD VISTA. Considering that most of the time Developing countries lack of high skilled human capital, to meet the Project Requirements Governments could wish not only to take part to the “data revolution” but also decide to accelerate their institutional adaptations to converge towards the international ruling frame.</p> <p>The Project Requirements provide the standardized framework necessary to monitoring, reviewing, reporting and benchmarking in a common language to all parties. For that relates to project financing, if the required institutional reforms are made at the domestic level SD VISa should attract supporters such as the domestic business sector likewise FDI. It should also help to unlock additional and new sources of public/private funding at the national, regional and international level and ease access to the specific mechanisms identified at Addis-Ababa.</p>		<p>Verra will aim to streamline the <i>Standard</i>.</p> <p>Support noted for SD VISa as a project design tool, certification standard and as a framework to standardize monitoring, reporting and verification across projects for the ease of investors/funders.</p>
0_8648	0 Note to Reviewers	<p>a) Any structuring projects to be nationally expanded, or lower scaled project should envisage their benefits to and negative impacts on M/VG. They should include a mandatory M/VG Framework.</p> <p>b) Good projects yet approved before SD VISa requirements should be annexed with a M/VG Framework for complying with SDG 17 and harmonization.</p> <p>In a small extent, the controversial hydroelectric power plant in Belo Monte, Brasil illustrates this idea. Per se, a hydroelectric power plant for covering the 1/5 energetic needs of a country is a good project. When promoters and institutions assume that: « Belo Monte is a seminal project that goes beyond the indigenous question and social matters” it is no longer more a good project”.</p>		<p>Support noted for SD VISa requiring mandatory benefits to marginalized and/or vulnerable groups (M/VG). SD VISa has been revised to require projects to pay special attention to marginalized and/or vulnerable groups if they are present among project stakeholders.</p> <p>All projects validated to SD VISa will have to meet its requirements; whether marginalized and/or vulnerable groups must be included in beneficiaries is an open question.</p>
0_8675	0 Note to Reviewers	<p>South Pole would like to thank Verra (aka VCS) for the work conducted on SD VISa program and the opportunity given to stakeholders for their opinions on the project requirements document. We at South Pole do believe in highlighting and aligning carbon projects' co-benefits with the SDGs through a globally avowed and transparent standard approach. In this regard, we generally praise what SD VISa is aiming to achieve. At the same time, we have a strong view on Verra's continued successful presence in the voluntary carbon mitigation sector and we hope its flagship topic (i.e. climate impact) will not lose focus with the addition of SD VISa program, even though optional. We do recognise advantages of developing SD impact monitoring, reporting and verification guidelines that can be applied to various project types and regions quantifying SDGs' impacts in a fair, robust and transparent manner. Yet it is not tangible to us what will be the added value of SD VISa, to carbon projects without considering the magnitude of such impacts and without setting any clear standardized approach for weighing the impacts against applied technologies, geographical regions and other relevant factors. Our general opinion is that the document is a positive concept, but yet too pre-mature to be able to make a scalable impact needed to trigger the demand in the climate market, let alone the non-existing SDG asset market. In addition, allowing for user-defined methodologies in quantifying SDGs may result in subjective reporting of such impacts which in return can potentially undermine the objective and successful role that Verra has represented in the climate sphere. Overall, the guidelines for stakeholder analysis, positive contributions and double claiming seem confusing and will need further clarity.</p>		<p>SD VISa is designed to be used with the VCS and other GHG accounting programs, in which contexts it may be considered a "co-benefit" standard. Support of the VCS Program noted. Verra will continue to manage and develop the VCS Program independent of SD VISa.</p> <p>Support noted for SD VISa as a standardized framework to monitor, report and verify sustainable development benefits. Caution noted about the newness of the demand for claims and assets in the sustainable development space. Caution noted regarding allowing for proliferation of user-defined methodologies. Verra will take both of these cautions into consideration while developing the SD VISa Program Guide.</p> <p>Verra will work to improve the clarity of guidelines for stakeholder analysis, positive contributions and double claiming.</p>

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0_8677	0 Note to Reviewers	SD Vista requirements are strongly connected. For projects not originally designed as aligned to SDG's it may take some realignment. for better results alignment to SDG's and SD vista requirements should come prior to project set up during proposal stages. SD Vista requirements help focus projects accordingly.		Positive perception that SD VISTA is strongly aligned with SDGs noted.
0_8678	0 Note to Reviewers	a) should be mandatory b) SDG's focus heavily on M/VG so benefits from SD vista should be encouraging this.		Support noted for SD VISTA requiring mandatory benefits to marginalized and/or vulnerable groups (M/VG) due to focus in the SDGs on M/VG. SD VISTA has been revised to require projects to pay special attention to marginalized and/or vulnerable groups if they are present among project stakeholders.
0_8679	0 Note to Reviewers	The detail of this document is a good framework for project design. The links to the SDG's can be high level and frameworks may be difficult to in field practitioners to translate into daily work if brought in after project design, however if project design should be based from the framework to start and capacity is built from the the beginning then opportunity to align to SDG's and certification.		Support noted for SD VISTA as a project design tool for aligning projects with the SDGs.
1.2_13474	1.2 Scope of the SD VISTA Program	defining the scope of certification	In case the guide will set more than two levels of certifications, I suggest to include these in the introduction. I just want to make sure that there is one or more levels depending on the SD achieved results.	Concern acknowledged about defining levels of certification under SD VISTA. The SD VISTA <i>Program Guide</i> will explain that multiple SD VISTA claims may be stated on the validation and verification statements. Section 5.1 of this document sets out that SD VISTA claims "are noted...in the validation/verification body's report and statement".  Verra is exploring potentially offering an alternate certification pathway (besides third-party validation and verification) and will be sure to clearly introduce that if it becomes part of the program. It is not yet documented in the <i>Standard</i> or the <i>Guide</i> .
1.2_13573	1.2 Scope of the SD VISTA Program	Synergy with VCS and CCB	It is quite clear that SD Vista will have a synergy with the VCS Standard. However, it is not so clear to me how will it work together with the CCB Standards, since it seems they quite overlap in most items. I am referring exclusively to AFOLU projects.	Because SD VISTA is based on the CCB Standards, there is significant overlap between the two -- particularly in the Project Design (SD VISTA) and General (CCB Standards) sections. Verra plans to release templates to streamline joint certification to SD VISTA and the CCB Standards. A note to this effect has been added to the <i>Program Guide</i> .
1.2_13576	1.2 Scope of the SD VISTA Program	At least one marginalised or vulnerable group?	First, it is important that the small dots for definitions appear under "marginalised and/or vulnerable group" in the second paragraph of the scope. Secondly, the definition of these marginalised groups in the glossary is quite vague, so I fail to understand why reference is being made to "at least one" group, what would a project proponent end up saying here?	The dots for the definition are a Collaborase function and will not appear in the final version of the standard.  Concern noted about the definition of marginalized and/or vulnerable group and its use. If the final version of the standard ends up using that term, Verra will re-examine its definition and use in this instance.
1.2_8649	1.2 Scope of the SD VISTA Program	Guide allows calculation Emission avoided or credits earned, then why not include as single process with more simpler methodologies or avoiding duplication of data.		Concern noted about lack of emission reductions or removals (ERRs) section of the <i>Project Requirements</i> . While the SD VISTA Program can be used with a GHG accounting program such as the Verified Carbon Standard, it cannot itself be used to generate ERR credits. A Climate Module has been added as Appendix 1 to the <i>Standard</i> ; this module can be used to make claims about <i>estimated</i> ERR quantity.
1.3_13577	1.3 Language	Stakeholder is broader term so that we need to clarify it.	It will be good if we can separate right holders and stakeholders in each project so that their role will also be identified accordingly.	Concern noted about grouping all stakeholders together. Added the following sentence to section 2.1.11: "Stakeholders who have rights to resources or land that may be affected by project activities should be clearly identified."
2.1_13475	2.1 Project Goals, Design and Long-term Viability	SD goals & targets should be coherent with and integrated into the UN development agenda	The Sustainable Development Goals and Targets must be formulated as stipulated in the 2030 agenda, while recognizing the link with project-specific Goals & Targets. The projects SDG should be literally expressed in full compliance with the formal text of the UN agenda document.	Support noted for SD VISTA to use the Sustainable Development Goals and Targets as recognized by the United Nations.

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2.1_13500	2.1 Project Goals, Design and Long-term Viability	Is the connection with the Sustainable Development Goals too weak, strong enough or too strong/constraining?	SD VISa Project Requirements are strongly connected to the Agenda 2030 and the SDGs. First, assessment/evaluation must integrate the three dimensions of development around the 5Ps as recommended by the Agenda. Second, the methods or tools proposed by the Guide help to apply complexity in understanding when necessary. The methodology serves the building of local capacities and capabilities in Developing countries. Third, by highlighting sectorial interdependence and interconnectivity the process helps to evidence how SDGs and they targets are enabling, counterproductive, or competing between them according the recommendations made to assess policies or actions embedded in a given Goal.	Positive perception that SD VISa is strongly aligned with SDGs noted.
2.1_13512	2.1 Project Goals, Design and Long-term Viability	Results description and mapping	Please note that in 2.1.4 "These chains shall describe the project's outputs, outcomes and impacts (intended and unintended) for people, their prosperity and the planet. These results should be S.M.A.R.T. for the most relevant ones in order to be useful". and under 2.1.6 "If the project's sustainable development benefits will be experienced outside the project location (as identified in Section 2.1.5), those areas shall be specified by impact using geodetic polygons to delineate the geographic area and provided in a KML file, when appropriate". In fact, some broad impacted areas could not be specified in the map.	Proposal noted to specify that the project's outputs, outcomes and impacts specified in section 2.1.4 (current 2.1.3) be SMART.  Proposal noted that some impacts cannot be mapped. However, in order for impacts to be monitored and verified, a project needs to be able to measure them and an auditor needs to be able to assess the results of that monitoring. If an impacted area cannot be specified, it may mean that the project's influence is just one of many factors leading to that impact. SD VISa is intended to capture only the most direct impacts of a project's activities.
2.1_13575	2.1 Project Goals, Design and Long-term Viability	Positive impacts	Provided that all projects that are in the end approved by SD Vista would represent SD benefits, I do not see why in this section (in the note below 2.1.4.2 in particular) there is a reference in case that positive impacts do not exist. It could be argued that all projects under SD Vista must provide a positive impact.	All SD VISa projects must demonstrate positive impact. Concern is noted that (v0.1) Section 2.1.4.2 specifies that negative effects be monitored and mitigated so that the project does not cause net harm. Verra has inserted the following sentences in (v0.2) Section 2.1.4: "Precautions shall be taken where possible to avoid negative outputs, outcomes and impacts identified in the causal chain(s). If it is directly caused by project activities, any negative output, outcome or impact shall be mitigated".
2.1_13578	2.1 Project Goals, Design and Long-term Viability	Target which contribute to achieve goal	This target and indicators can be drawn from National indicators (developed by national entities)	Support noted for SD VISa to permit use of Sustainable Development Goals Indicators developed at the national level.
2.1_13579	2.1 Project Goals, Design and Long-term Viability	Stakeholder identification	We can't say that you must identify at least one marginalized communities. It will be contextual. There will be number of communities who are directly or indirectly impacted by the project. In this case, we have to separate stakeholders and right holders.	Opposition noted for SD VISa requiring mandatory benefits to marginalized and/or vulnerable groups (M/VG). SD VISa has been revised to require projects to pay special attention to marginalized and/or vulnerable groups if they are present among project stakeholders.  Concern noted about grouping all stakeholders together. Verra has clarified that unless explicitly stated, all stakeholders referred to in the <i>Standard</i> are people who can potentially be affected by the project.
2.1_8646	2.1 Project Goals, Design and Long-term Viability	I also share your opinion as being stated that such designed SD Vista supposes that projects include a M/VG Framework		Support noted for SD VISa requiring mandatory benefits to marginalized and/or vulnerable groups (M/VG). SD VISa has been revised to require projects to pay special attention to marginalized and/or vulnerable groups if they are present among project stakeholders.
2.2_13514	2.2 Stakeholder Engagement	There is a need for a formal engagement of stakeholders	Indicators of stakeholders engagements should be stipulated in the project proponent's rules of procedures and considered as traceability elements for SD VISa auditing	Support noted for formal engagement of stakeholders.

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2.2_13580	2.2 Stakeholder Engagement	Information to stakeholders	Better to write relevant stakeholders. Regarding to information sharing to stakeholders, i think that we must develop mechanism so that it will be easily access.	Footnote 1 makes it clear that "Throughout the SD VISta Program, unless otherwise specified, the term 'stakeholder' means those stakeholders in the geographic vicinity of the project who could potentially be affected by project activities. Other potentially interested stakeholders—e.g. local or international NGOs—are identified as such." The definition of the term 'stakeholder' in the glossary also reflects SD VISta's focus on <i>affected</i> , as opposed to <i>interested</i> , stakeholders.  Support noted for Section 2.2.1, which stipulates that full project documentation must be accessible to all stakeholders.
2.2_13582	2.2 Stakeholder Engagement	OHS-workers	occupational health and safety is important issues. But in general, project can't ensure safety to all stakeholders. We have to focus to workers safety and health.	Proposal that occupational health and safety requirements (v.02 Section 2.2.13) be applied only to workers (not relevant stakeholders). Verra has changed the wording from "relevant individual stakeholders" to "individual stakeholders involved in carrying out project activities" to clarify the fact that in many cases people who need orientation and training from the project are not always employed by the project.
2.2_13581	2.2 Stakeholder Engagement	equal opportunity to work	It will be hard to provide equal opportunity to provide work in project. We have to say equitable opportunity to work so that needy people will get work first.	While the proposal to substitute "equitable" for "equal" in second draft Section 2.2.14 is noted, Verra doesn't agree that changing the wording as proposed would lead to the commenter's desired result. We have inserted the following sentence in that section, which we hope addresses the commenter's point: "Describe the measures needed and taken to ensure that members of local communities are given a fair chance to fill positions for which they can be trained."
2.2_8647	2.2 Stakeholder Engagement	For keeping in line with Sustainable Development Goal17 formalization of stakeholders' engagement is duly stipulated		Verra acknowledges that SDG 17, specifically Target 17.17 ("Encourage and promote effective public, public-private and civil society partnerships...") could be perceived to support stakeholder engagement in sustainable development projects.
2.3_13521	2.3 Management Capacity	There a need to specify measures to be taken in order to provide anti corruption assurance	Either ISO standard on Anti-corruption or ISO standard on Compliance Management systems should be performed at least once every five years.	Suggestion noted to require compliance with ISO anti-corruption or compliance management systems. Verra reviewed these standards (ISO 37001 and 19600) and considered including them as part of assurance mechanism in v0.1 Section 2.3.5. We found them to be overly burdensome for most anticipated SD VISta projects.
2.3_13583	2.3 Management Capacity	adequate resources	Sometime, project is implementing in grassroots level and their network want to pilot SD Vista they may not have adequate resources. It is contextual matter!	Suggestion noted to change the wording of the concept to eliminate need to document "adequate resources for effective implementation". Verra has revised the concept to refer to the idea that the project "can ensure sustainable resources for effective benefit delivery" and eliminated v0.1 indicator 2.3.4, "Document the financial health of the implementing organization".
2.4_13522	2.4 Legal Status and Rights	The simplification and streamlining of this procedure would be a welcome step	This procedure seems too cumbersome and onerous. I believe that this section should be simplified and keep only significant criteria in order to reduce the certification cost that might be unfordable.	Suggestion noted to streamline Section 2.4, which addresses fundamental elements of project design and implementation. We will provide guidance on how stakeholders can support demonstration of compliance with the requirements in this section (e.g., stakeholders could raise legislative requirements that have not yet been identified by the project that need to be considered).
2.4_13572	2.4 Legal Status and Rights	Free, Prior and Informed consent	I have found for several years now that this concept is quite clear when indigenous people live in the area in question. However, when no indigenous people live in the area and there are no claims on the area by any tribe, rules should be clear as to how to address this. And sometimes there is like a blank zone. In our opinion, the clearest way is to simply demonstrate that this is not the case and determine that this issue has no applicability.	Verra considers stakeholder engagement and consultation to be important parts of any sustainable development project, even where the project's stakeholders are not Indigenous Peoples.  Where there are no or few stakeholders whose property rights affected by the project, the response to requirements of second draft Section 2.4.5 should be straightforward. FPIC is only required of those whose property rights are affected by the project.

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2.4_13620	2.4 Legal Status and Rights	2.4.6. Demonstration of projects compliance with legal status	<p>This is a very sensitive aspect. Local political will, opinion leaders and Foreign investors may act adversely or detrimental to M/VG benefits and ecosystems even when M/VG and environment impact studies are required.</p> <p>The project being based on an internationally accepted legal framework it should be submitted to an international follow up by donors after countries have made their necessary legal changes.</p>	<p>All SD VISa project documentation will be posted on the Verra project database for the review of anyone interested, including donors.</p> <p>Any changes to project design or implementation should be completed prior to project validation and verification, and would thus be reflected in the posted documentation.</p>
3.1_13523	3.1 Stakeholders at Project Start	reference to be adjusted	the list of stakeholders refers to 2.1.9 instead to 2.1.7 idem for referring to 5.3.2. that does not seems to match the specified item	References revised.
3.2_13524	3.2 Impact on Stakeholders	adjusting the reference	cite 2.1.9. instead of 2.1.6	Reference revised.
3.3_13595	3.3 Monitoring of Impact on Stakeholders	Stakeholders Monitoring	That seems a little bit difficult to implement and seems to come and add weight to a yet complex process even for practitioners.	Concern noted that stakeholder impact monitoring may be too complex. However, if the project wishes to demonstrate positive impact on stakeholders it must measure and monitor their change over time with respect to the areas it aims to impact.
3.3_8676	3.3 Monitoring of Impact on Stakeholders	As state above this process is complex. Our projects have multiple funders, while all projects feed into a bigger process,. Our second draft frameworks for projects monitor these according to each funder requirements, therefore measurements might be slightly different.		Concern noted that stakeholder impact monitoring may be too complex. However, existing monitoring can be used to provide data for SD VISa.
3_13621	3 Benefits for People and Prosperity	M/VG stakeholders	Referring to the definition of M/VG in the Agenda 2030 including at least one M/VG into stakeholders has no real significance. M/VG are diverse with different problems (women, youngs, disabled, migrants, prisoners in reinsertion, indigenous population...)	Concern noted about the definition of marginalized and/or vulnerable group. If the final version of the standard ends up using that term, Verra will re-examine its definition.
4.2_13609	4.2 Impact on Natural Capital and Ecosystem Services	Relationship of document indicators and field level indications	There is need to use, where practical, quantifiable indicators that can both be verified through documents and field visits. Paper based success stories should be avoided. People MUST see physically success, where possible e.g. area planted, areas under natural regeneration, area conserved, number of irrigation systems, amount of water available, increased production, increased incomes or markets for local communities, improved communication (roads, mobile communication) etc. These should be seen and not just written about BUT visible!!	Support for field component to assessment audit noted. This will be addressed in the SD VISa <i>Program Guide</i> .
4.2_8650	4.2 Impact on Natural Capital and Ecosystem Services	<p>The Guidance Manual on Valuation and Accounting of Ecosystem Services (even if conceived for SIDS) Ref. Regional Seas Reports and Studies No 193 (UNEP) provides a large range of valuation techniques.</p> <p>Except error or omission, there is no allusion to Accounting in the SD VISa guide. According to harmonization recommendation contained in the Agenda 2030. That is a concern it should be referred to as, harmonization between national accounting systems and the SNA will be mandatory when estimate the value of the Environment and ecosystems services in GDP.</p>		<p>Verra will consider including the UNEP guide mentioned by the commenter in SD VISa guidance.</p> <p>Concern noted about lack of accounting methods in the <i>Project Requirements</i>.</p> <p>To address harmonization, Verra has added the following sentence to indicators 3.3.1 and 4.3.1: "Where possible, the data monitored by the project should be aligned with that monitored by the national government with respect to the SDGs."</p>
4_13600	4 Benefits for the Planet	If sustainability of Natural resources is broadly emphasised it will eventually benefit the planet.	Sustainability of Water by focussing on Natural sources will be welcomed.	If SD VISa projects have any impact on natural water sources, they are required to address all the ecosystem service and natural capital requirements of the Benefits to the Planet section (Section 3).

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	5 Claims and Assets	There doesn't appear to be any indication of how renewable energy claims or RECs, where present, would be treated or affected by SD VISTa certification, where the project type is renewable energy	Insert something similar to the language at 5.3.4 that addresses the relationship between VCUs and VISTa claims -- and what happens in case of overlap. If SD VISTa is effectively just helping quantify and verify REC attributes in this case, that may be helpful to REC buyers and the REC market, but if those claims are not explicitly connected to the instrument, then it may cause confusion about who can claim what and for what purpose. So if an asset is issued through another program and an SD VISTa claim is also verified for that project, you may think about requiring that there be an explanation of the relationship between that claim and any assets produced.	Concern noted that RECs are not mentioned. Inserted an example of how RECs would be treated under v0.2 Section 5.3.7 to ensure that there is no double counting.
6_13584	6 Validation and Verification Requirements for the Project	Cost of validation	In case of small scale project, project proponent cannot afford cost of validation and verification. In this case, the cost associated with this process needs to be minimized.	Concern noted that costs must be minimized, especially for small scale projects; Verra agrees. For this reason we propose introducing a self-declaration process (of compliance and of achievement) for projects in their first three years of using SD VISTa.
6_13608	6 Validation and Verification Requirements for the Project	Practical aspects of Validation and Verification process	While the scope of the SD VISTa looks good, the process of validation and verification will need to be improved as compared to others e.g. VCS if this is to deliver positive results. Most validation and Verification processes are basically "ticking the box" (paper work) without the true field level activities verified. As a result you have project that should a lot of success, while the opposite is true in the field. It is important to have systems that will result into true development especially for projects involving local communities.	Support for field component to assessment audit noted. The need for field assessments is addressed in the SD VISTa <i>Program Guide</i> .
7_13574	7 Glossary	Moving this section upfront	I would suggest that this section is presented upfront at the beginning of the document, since there are concepts that are indeed new for the reader	As with other Verra standards programs, the glossary for this document will be combined with other terms that need definition in a <i>SD VISTa Program Definitions</i> document.  Verra will endeavor to ensure that concepts that may be new to users of the SD VISTa Program are well defined in context as well as in the <i>Program Definitions</i> document. For example, description of vulnerable and marginalized people has been added where those terms first occur in the document.