Section	Requirement	UK	Germany	Canada	UNFCCC	UN REDD	Response
General		It would be useful to have a compare and contrast document from the current FCPF Methodological Framework, highlighting what changes have been made and the rationale for those changes (e.g., where/how it can strengthen the integrity/process of the standard)					An annotated version of Part A has been created to try and show and explain the changes more clearly
		Related to wider transaction potential: o There should be a clearer articulation of how this fits with CCPs and ICVCMs ongoing work – how does the updated FCPF standard fit within that – would it be aligned? Are WB joined up with ICVCM re consultations / what is the plan for this? o Similarly, there should be more detail on how this relates to/fits in with A6 discussions and expectations. o How will this standard relate to the WB recently published “Engagement Roadmap for Carbon Markets”?			It might be useful to have a stronger reference to implement this in alignment with the Warsaw Framework for REDD+ and Paris Agreement Article 5.2. I also notice that there is no reference to the contribution of these activities towards achieving a country’s NDC, is that intentional?	Relation to NDC: . Since Part-B is also part of FCPF standard, In Part B foot note 1 it is mentioned that "SCALE supports client countries by allowing them to both enhance ambition and accelerate the fulfilment of their NDC commitments to achieve low carbon development in a socially inclusive manner". However, here relation to NDC is missing on page 1 of Part A section A.1.2 on Scale of Ambitions. It is important to note that some countries have quantified targets for forestry sector in their NDCs while these targets might not be mentioned in national REDD+ strategies (such as Lao PDR).	This version of the FCPF Standard is designed for use in SCALE, and as with FCPF 1.0, it is expected to be compliant with CORSIA requirements (which includes requirements for transactions under Article 6), IC-VCM. The role of the WB as a standard setter, including under SCALE will be integral to the implementation of the WB engagement roadmap and related discussions wtih different initiatives, including the IC-VCM. Regarding, NDCs, the objective of SCALE is to contribute to the NDCs and funding under SCALE will likely come with requirements . The proposal is therefore not to address this in the Standard itself and not prejudge what SCALE might require in that regard
			Is there a reason why the wording in the text is “indigenous peoples” instead of “indigenous peoples and local communities”?				References to indigenous peoples are taken from the Methodological Framework of the Carbon Fund. That MF was extensively discussed and consulted, including with CSO representatives and this is the language that was agreed. However, some references to communities have been added specifically in the benefit sharing section
1.1 Scale and ambition	**A.1.2**	Would be helpful to define jurisdictional scale upfront here (i.e.… Subnational / national)				It will help to clarify what "significant scale" means. This will assist stakeholders in determining whether their Accounting Areas meet the required criteria. ‘’significant scale’’ is open to all sorts of interpretations. Also take into account smaller countries when making this designation.	A.1 and A.2 have been switched and changes have been made to A.2 (formerly A.1) to avoid any confusion
			The document states that the standard operates at “jurisdictional scale and/or takes a programmatic approach (i.e., involves multiple land areas, landowners or managers within one or several jurisdictions)”. Could you define “programmatic approach” in detail and explain how this is different from project-level approaches (e.g. VCS) which are frequently subject to public criticism?			The term "coordinated manner" appears bit confusing concerning the coordination of interventions. It might benefit from explicit clarification or expansion to indicate if this coordination aligns with the concept of "nesting."?	Changes have been made to what is now A.2.2 to emphasize that implementation follows the Accounting Area or part of the Accounting Area through a programmatic approach.
					For the reference to the national REDD strategy, suggest to be specific, referencing the REDD+ national strategy submitted to the UNFCCC, possibly referencing the Lima Info Hub for REDD+		A footnote has been inserted
2.1 Scope and methods	**A.3**	Would be useful to have “REDD+ activities” be explicitly set out in a footnote – i.e. (a) Reducing emissions from deforestation; (b) Reducing emissions from forest degradation; (c) Conservation of forest carbon stocks; (d) Sustainable management of forests; (e) Enhancement of forest carbon stocks.					This is defined in the glossary which is now also available

							At a minimum, ER Programs must account for emissions from deforestation. Emissions from forest degradation also shall be accounted for where such emissions are significant. Any minimum threshold? A % of total?		The requirement is that ER Programs always have to include deforestation in the scope of the accounting. A.3.3 sets the threshold for including forest degradation
	A.5					In the reference to decision 12/CP.17., not clear why later guidance would be excluded, in particular decisions 12/CP.19 and 17/CP.21. Might be better to refer to the Warsaw Framework for REDD+, or decisions referenced on Article 5 of the Paris Agreement			Reference has been updated
	A.5.1		In current FCPF Programmes, is it common for countries to have different forest definitions, or generally is forest definition used consistent across board						We have seen countries changing forest definitions also to make it more consistent. Especially in the early days of the Carbon Fund there were probably more inconsistencies with for example the definition used in the FRA
						Reference in the footnote seems wrong, this is a COP decision, not a SBSTA conclusion. The Guidelines for submissions of information on reference levels contained in the annex to decision 12/CP.17 would be more recent and relevant			Reference has been updated
	A.6		Clarify if at the time of programme generation, or at any undefined point. i.e. if the IPCC guidelines changed, whether the programme must then change its method. There is no reference of "most recent" in A.6.1 whereas it is in A6						The requirements also expect a level of consistency between the methods used for the Reference Level and during monitoring. So in general if the IPCC guidelines a re updated, those would first be reflected at the time the Reference Level is updated
	A.7.1		What about definition of land use changes (from forest/to forest), particularly important for instances of activity on organic soils, transition from cropland/to cropland etc						edit has been made to include definitions of land use classes in general
2.2 Crediting Period, Reporting Period and Reference Level renewal	**A.8**		Why twenty years? What is the rationale? Would there be flexibility if a country were to be interested in a shorter crediting period?	We understand that the extensive crediting periods seek to generate a long-term perspective for partner countries. However, how do you view the fact that the crediting period is considerably longer than the goals of the Glasgow Leaders´ Declaration to "halt and reverse forest loss and land degradation by 2030"?					The 20 years is based on the minimum crediting period required under CORSIA. This would makes all programs eligible under CORSIA (although obviously it is optional for programs if they actually want to sell under CORSIA). Alternative approach would be to use shorter period with specific requirement for programs that seek CORSIA eligibility
			How would the decision on the renewal of the crediting period be made						In principle it would be up to the ER Program to indicate if they want to renew the crediting period
			We would like to discuss the earliest starting date of the first crediting period (currently bracketed as 2016)						Open for discussion. This year has been chosen to align with Paris Agreement and allow countries that are not in the CF to bring forward results
					Paragraph A.8 mentions double-counting requirements, but it is unclear what specifically these are in the document (e.g. under section 5 ER program transactions). We suggest further clarification to help the reader.				Text has been added to clarify this
	A.9		Why is the validity of the Reference Level between four and six years? What if a jurisdiction wanted to update it more regularly? Is this different to previous FCPF requirements?						Other standards use 4-6 years (VCS JNR) or 5 years (TREES). Requiring more frequent updates would put a significant burden on countries since they also have to have the opportunity to monitor and report their emissions against the RL. 4-6 years gives some flexibility to programs and allows them to align the updates with other national processes

	A.10		The length of a Reporting Period shall be minimum one year and maximum five years. Is there a justification for why five years? Why not less? Why not more?						Longer periods usually make it easier for programs to detect changes and report their emission reductions. Shorter periods allow for regular payments if ERs are achieved. It is suggested to leave flexibility for countries to optimize this according to their needs but it is considered that 5 years would be the maximum to ensure countries actually report, reversals are detected etc.
	A.10.1 and A.10.2		These are good additions that improve clarity and process. What do we mean by 'encouraged' here ? (also acknowledge need to provide some flexibility, but good to understand how this works in practice)						Since the previous requirements allow flexibility on the length of the Reference Level renewal period and the Reporting Period, it was considered that it might be complicated to require alignment so the word encouraged to use to make the programs consider this aspect without putting in place hard requirements
	A.11		Would be good to be clear on how SCALE is supporting here and under what circumstances we might see the need to flex. If a reference level is valid for a period of 4-6 years (A.9). A Reporting period length is between 1 and 5 years (A.10.). It therefore seems challenging to then encourage synchronization of updates with reporting periods - unless the proposal is, when a reference level is updated, it should align with the end of a reporting period.						The idea is to leave some flexibility to ER Programs also noting that the length of the Reporting Periods is not fixed and can vary during the Crediting Period. However the draft document encourages the programs to consider the different lengths when designing their programs
2.3 Reference Levels	**A.12**					*The development of a Reference Level is informed by the development of a Forest Reference Emission Level or Forest Reference Level for the UNFCCC* Do you mean “submitted to the UNFCCC for technical assessment”?			Text has been updated to incorporate the suggestion
	A.12.2					*explains the relationship between the Reference Level and any intended submission of a Forest Reference Emission Level or Forest Reference Level to the UNFCCC* Only ‘intended’, or also past?			Text has been updated to incorporate the suggestion
	A.13						Noting that ART-TREES also meets the methodological requirements of SCALE, the use of a 10-year reference period in the proposed FCPF standard is a departure from efforts by leading crediting programs to promote compatibility and avoid market fragmentation. An example of convergence in the market is the definition of reference periods under Verra JNR (4-6 years) and ART TREES (5 years).		This version of the FCPF Standard builds on the exiting Methodological Framework for the Carbon Fund which also requires 10 years, although some of the flexibility in the MF has been reduced. For now the proposal is to stay with this original requirement also to differentiate the Standard from other standards

							As the FCPF does not yet have a formal protocol for nesting, the presence of REDD+ projects would require alignment with project-based standards that operate a risk allocation tool for baseline distribution. For example, VCS REDD+ projects can in principle be nested under an ART-TREES baseline because compatibility between the length of their respective reference periods makes possible the application of the VERRA risk allocation tool under ART-TREES. However, this would not be possible in a baseline defined under the FCPF.		In terms of nesting, this is meant as a standard for jurisdictional REDD programs and the nesting of projects would be arranged through the Benefit Sharing Plan. The standard itself does not address modalities for nesting but does contain requirements on avoiding double counting (for example in section 5.2). If there is a REDD+ project in place that has issued credits for the same vintage, these will be discounted.
	A.14		*In the event that data are not available for the exact dates, ER Programs may estimate activity data or emission factors by interpolation.* Under what situation could this be used for? Is this likely ? And , are there risks of undermining envi integrity here? And what happens if alternate data later comes to light, and the reference level is then too high or too low?						The guideline that is the basis for this requirement was designed to respond to situations were countries already have a NFMS in place which is collecting information at regular intervals (e.g. Vietnam, Lao PDR). These intervals didn't always align with the dates of the Reporting Periods or the Refence Periods and this allows programs to rely on these systems for their reporting under the standard
	A.16		Good to discuss HFLD methodology (approach taken, rationale etc) - esp. re experience with current standard and countries involved.						This version of the FCPF Standard builds on the exiting Methodological Framework for the Carbon Fund and the approach taken there for dealing with HFLD countries . This includes the size of the adjustment and the conditions under which adjustments are allowed. Experience has shown that the FCPF approach is robust as it does not allow a "blanket" adjustment, but requires countries to justify and quantify the adjustment itself. We anticipate that the adjustmnet will only be applicable to those HFLD countries that already see an upward trend in deforestation (e.g. Congo).
				Can ERs generated through HFLD adjustments be traded in carbon markets? If this is the case, we believe that this should be discussed, as this could raise questions regarding the environmental integrity of the standard.					At the moment all the ERs issued against the Reference Level are considered as eligible units and no distinction is made between emission reductions compared to the historic average and emission reductions against the adjusted RL. We don´t see that FCPF credits from HFLD countries could undermine environmental integrity since the FCPF requirements require countries to justify the existence of an upward trend in deforestation-forest degradation and quantify this, it does not allow an "blanket" adjustment based on parameters that are not related to actual trends.
	A.16.1		Why 0.22% as the threshold for long-term historical deforestation ?	Could you explain the underlying criteria for the HFLD definition (<0,22%/yr.)?					This is the definition used in annex 2 of the 'Krutu of Paramaribo Joint Declaration on HFLD Climate Finance Mobilization' and is therefore considered as a definition that is acceptable to HFLD countries
	A.16.3		An adjustment of the Reference Level above the average annual historical emissions during the Reference Period may not exceed 0.1%/year of Carbon Stocks. How does this compare to other standards						The maximum adjustment is higher than for example TREES where it is maximum 0.05%. However since the adjustment needs to be justified (and is not automatic based on a score like TREES) and quantified, the actual adjustment can be lower. Also the adjustment is relevant for countries seeing an upward trend in deforestation/deforestation, so the expectation is that 0.1% will not be significant. Experience under the FCPF is that this cap is below the actual adjustmnent that is justified and quantified, showing the conservativeness of 0.1%.

2.6 Accounting for Displacement (Leakage)							The current approach to leakage treatment within the FCPF framework differs from that employed by Verra JNR and ART-TREES. The FCPF's emphasis on mitigation strategies without explicit provisions for compensation contrasts with the structured compensation mechanisms present in Verra JNR and ART-TREES. However, this difference is of lesser importance than the difference in the duration of the reference period.		For now the requirements stay mostly unchanged compared to the Methodological Frame work of the FCPF CF. This seems appropriate since this version of the standard would be used by the World Bank managed SCALE partnership and therefore the World Bank and the partners in SCALE would consider the design of the programs. If the FCPF Standard would evolve further to also open for programs outside World Bank funds, then this section would be further revised
	A.25.1		*Deforestation and degradation drivers that may be impacted by the proposed ER Program Measures are identified (including those that could potentially cause displacement through markets)* . Could we expand this point further since surely markets are the key driver for displacement						The reference to market leakage was already added compared to the original text from the Methodological Framework to emphasize the consideration of this type of leakage. Displacement through Market Effects was also added in the glossary although it refers to the original definition where this was covered under (ii)
	A.25.2		The ER Program has in place a strategy to mitigate and/or minimize Displacement, and the strategy should be updated as needed. Can we define 'as needed' ? Does this need a set timeline?						Change made to at minimum have the strategy updated every time the Reference Level is updated
							First time ERPD is mentioned; merits explanation and acronym in full.		Acronym now explained
2.7 Accounting for Reversals (Non-permanence)	**A.26.2**		*The ER Program Entity demonstrates how effective ER Program design and implementation will mitigate significant risks of Reversals identified in the assessment to the extent possible, and will address the sustainability of ERs, both during the Crediting Period, and beyond the Crediting Period.* These following bullets do not make clear how this will be addressed beyond the crediting period? I.e., what would be the requirements (monitoring/buffers etc) beyond the crediting period? Who holds liability for any reversal beyond the crediting period? Additionally, it is not made clear as to what happens to any reversal buffer ERs left in the pool upon the ending of the crediting period (it is made clear for uncertainty buffer)						Text has been added to clarify that, at the end of the Crediting Period, the corresponding proportion of Buffer ERs contributed by an ER Program that remain in the Pooled Reversal Buffer shall be cancelled. The FMT is currently exploring other options to ensure permanence beyond the Crediting Period based on its own analysis and considering the discussions on Article 6.4 and other relevant initiatives.
	A.27.8 and table 1		several of the examples of risk indicators could be phrased better. Who quality checks the modelling that informs risk set aside percentage for each risk factor? For risk factor D (Exposure and vulnerability to natural disturbances), how are local changes in climate patterns (over the crediting period) factored into the modelling (and risk set aside percentage).						There is no modelling involved in risk factor D, the risk assessment is purely carried out based on historical information. The FMT is currently exploring other ways of producing risk assessments for this factor that may be introduced at a later stage.

				Have the experiences of the methodological adjustments in Chile ERPA been taken into account in the risk factor „exposure and vulnerability to natural disturbances“?	Given climate change is increasing the severity and frequency of natural disturbances in many forest ecosystems around the world, we suggest FMT reconsider the default and resulting reversal risk set-aside percentages. The default set aside percentage should be more than 5%; we suggest 10% in line with risk factors A and B. In addition, given it is impossible to fully mitigate the risk of natural disturbances, we suggest the resulting set aside percentage should not be 0%, even if the reversal risk is considered low. We suggest 5% should be the lowest set aside possible.				The Default Reversal Risk set-aside percentage for Risk Factor D has been increased to 10%, which has also implied increasing the resulting reversal risk set-aside percentage for all risk levels.
	A.29		*If the Reversal takes place within the last two years of the Crediting Period, or if it represents more than half of the cumulative Pooled Reversal Risk Buffer contribution by the ER Program, the ER Program shall not be able to transfer any ERs generated subsequently until it has fully replenished the amount of cancelled Pooled Reversal Buffer ERs resulting from such (and any subsequent) Reversal.* Why does this not also follow the 50% / 30% rule? *A* nd what happens if the Crediting Period ends before the Buffer is replenished?						The rationale for not applying the "50%/30% rule" within the last two years of the Crediting Period is to reduce the possibility that the ER Program does not have enough time to replenish the Pooled Reversal Buffer before such period ends. Considering the comment, the requirement has been modified so that instead of 2 years, now this provision applies 5 years before the end of the Crediting Period.
	A.31		*If the Reversal Risk Set-Aside Percentages are increased, the amount of ERs in the pooled Reversal Buffer shall be determined in accordance with A.27.* To confirm, unlike if the risk set aside percentage becomes lower (where it is applied retroactively and buffer ERs are released), if it becomes higher, this is not applied retroactively, and the ER Program is not required to add additional ERs for the historical difference?						That is correct. The idea of allowing ER Programs to release Buffer ERs if they reduce their reversal risks is to incentivize them to carry out further efforts to mitigate such risks. The FMT is exploring the implications of applying retroactive adjustments to the ER Program´s Pooled Reversal Buffer contributions in cases where risks increase.
3. Safeguards	**A.46**					When referring to the UNFCCC guidance related to REDD+, might be good to be more specific, referring either to the Warsaw Framework for REDD+, or decisions referred to in Article 5.2 of the Paris Agreement			References have been updated
	A.46.1					*... by paying particular attention to Decision 1/CP.16 and its Appendix I as adopted by the UNFCCC* . More specific requirement to actually have a submitted safeguards information summary in the Lima REDD+ Information Hub might be useful			The information summary submitted to the Lima Hub might be more focused on the scale of the FREL submitted to the UNFCCC and might not necessarily match the ER program. The text is kept as is.
	A.47.2					In the footnote, reference should be to all safeguards decisions			footnote updated

	A.48.1		*The FGRM applicable to the ER Program demonstrates the following* And, perhaps, targets for the FGRM to understand/calibrate the appropriateness of the FGRM's implementation during this assessment? For example: proportion of grievances resolved and in X timeframe, number of actions/consultations undertaken with community to communicate the use of the mechanism, or grievance mechanism operational through X number of channels.						Under A.50.2 (former A.48.2) , there is the requirement that the FGRM "specifies the process to be followed to receive, screen, address, monitor, and report feedback on, grievances or concerns submitted". Under SCALE, this will be subject to World Bank supervision. Since the FGRM will be program and context specific, for example relaying on traditional authorities, and adding too many details in the standard itself might not be useful
4.1 Drivers and Land and Resource Tenure Assessments	**A.50.1**						*The ER Program ....supplements this assessment by undertaking an additional assessment of any issues ... that are critical to the successful implementation of the ER Program, including: ... iii. Areas within the Accounting Area that are subject to significant conflicts or disputes related to contested or competing claims or rights, and if critical to the successful implementation of the ER Program, how such conflicts or disputes have been or are proposed to be addressed; ....* Guidance should be provided on the time frame of this assessment. What period should it coincide with? The crediting period, the reference period, a reporting period? Who should conduct this assessment?		The assessment will have to be carried out by the ER Program itself but it will be subject to review by the World Bank and when the program information is made public. The intention here was not necessarily to identify every boundary dispute between neighbors but rather larger conflicts related to for example Indigenous Peoples. As such, no timeframe has been associated with this assessment
4.2 Benefit sharing	**A.51**		Is there a set amount of how much should go to benefit sharing? Or is there an aim? i.e., has there been consideration on how much going to different beneficiary groups, as guidance (rough proportions or a minimum threshold for benefits being shared on the ground/out of govt etc)?						A reference has been added to the FCPF guidance note on benefit sharing but no specific requirements have been added since the BSP is context specific and there might be variations between programs
				We suggest including, as far as possible, the results from EnABLE´s Global Dialogue on IP&LCs and RBCF: revised_global_dialogue_outcome_statement_for_fcpf_website.pdf (forestcarbonpartnership.org). When working with IP&LCs, this means, e.g., that communities get a stronger role in shaping, implementing and monitoring BSPs.					Some references to the role of IP and LCs have been added but at the same time the language is kept relatively as was agreed at the time of the Methodological Framework to allow application of the standard under different circumstances. The partners in the SCALE Partnership can choose to further emphasize this point int he strategic guidance for SCALE
							Are risks related to Benefit sharing included in the safeguards plans?		The BSP should be designed to support the ER Program Measures that are part of the program design. The safeguard plans cover the risks associated with the implementation of the program and the ER Program Measures.
	A.52.1		Is there a recommendation of how many consultations, as it might take multiple meetings/consultations with communities?						A reference has been added to the FCPF guidance note on benefit sharing which includes guidance on the consultation process but doesn't specific the number of consultations since this is depending on the program context
	A.53			Since BSPs are a fundamental contribution to the standard´s social integrity, we think it needs to be made explicit that their implementation is obligatory. Have you considered possible sanctions when BSPs are not implemented?					In the FCPF Carbon Fund the implementation of the BSP was part of the requirements under the ERPA. At this stage we don't want to preempt how this will be arranged under SCALE but if necessary, this could be added to the Standard at a later stage if not covered under the SCALE legal arrangements

	A.53.1		Will there be guidance/expectations for monitoring of benefit sharing beyond the reporting period/submissions of monitoring reports? [noting that a Benefit Sharing Guidance document will also be shared as part of the standard - will this be the August 2020 Benefit Sharing Note, or an additional document?]						The crediting period would be 20 years with an option for renewal. If programs are supported under the SCALE partnership, the arrangements to receive result-based payments would be much shorter than that 20 year crediting period so there should be reporting after the SCALE payments have ended but it has not been foreseen yet how and to whom the programs would report at the end of the Crediting Period
4.3 Non-Carbon Benefits	**A.56**		Will ER Program support separate generation of, e.g. Biodiversity Credits, and if so specify rules for stacking/bundling of carbon and non-carbon credits, to ensure overall integrity of respective markets?				Suggest using the term, ''core benefits'' Are biodiversity benefits included? Does the assessment of core benefits and biodiversity provide the possibility for a premium on price? If so, how would this be assessed.		Biodiversity can be included. At the time of the FCPF Methodological Framework REDD+ countries insisted to keep this language non-specific hen it comes to the specific non-carbon benefits to be included and this was left here for this version of the standard. ENABLE is considering a social inclusion standard that can be added to this standard and in the future the same could be done for biodiversity but for now the standard is limited to the carbon payments only since that is the focus of the SCALE Partnership. Moreover, as part of SCALE we are looking into developing the credit stacking and this might be added in later versions of the FCPF standard.
						Could be useful to highlight that non carbon benefits are recognized in UNFCCC decisions, e.g. 18/CP.21			A footnote was added
5.1 Transfer of Title to ERs	**A.57.2**		*If this ability to transfer Title to ERs is still unclear or contested at the time of verification, an amount of ERs proportional to the Accounting Area where title is unclear or contested shall not be sold or transferred .* … until it is clarified/resolved?						The suggestion was added in the text and confirms the practice seen in the FCPF Carbon Fund, for example with the payments to Costa Rica