

Transparency

Category	Value (total points, category)	Transparency											
		Criteria	Indicator	atmosfair comments about indicators	Maximum	CDM atmosfair valuation	atmosfair comment	GS CER atmosfair valuation	atmosfair comment	GS CER atmosfair valuation	atmosfair comment	VCS atmosfair valuation	atmosfair comment
Transparency	35	transparency policy	1. policy and service		10	10	Everything well documented and easy to find. All standards and templates are filed in logical order, according to their project cycle. Names for project data are unified. The structure of governance is transparently stated and every meeting-report and decisions of the executive board can be seen in.	5	Policy not completely documented, versions are disarranged, constantly proposing questions to the GS necessary, who won't know the answer often as well. atmosfair had to ask for documents very often that weren't offered at the GS-website. At the introduction of the new GS4GG the menu navigation for the policy on the website was renewed, an intuitive finding of documents is not possible. Moreover, even after several visits on the website, the finding of needed documents is difficult.	7.5	In this issue, the CDM and the GS won't complement each other, but function independantly, which causes the averaged grade.	7.5	Policy is fully documented, but the documents (compare with templates) aren't listed as structured as at the CDM. Translations aren't matching with the actual english version. Note on the website, that the english version is the valid one.
		Transparency projects	2. Who runs the registry of the projects?	Important, to be sure of the completeness and accuracy of the information	5	5	UNFCCC in Bonn, so UN-authority	2	GS-owned register (Markt)	5	Maximum of CDM and GS-VER	2	VCS owned register
		Transparency projects	3. Accessibility and user friendliness	Interested third parties should have access to the information of the online project register, which ought to be structured and well edited.	5	5	At the CDM-Website of the UNFCCC, all informations/documents will be in order and presented for download. All issuances will be listed in order.	2	At the GS the purchaser has to klick through disorderly arranged posts and won't even find his way as a pro. Number of generated certificates is still unknown, because only the VERs are listed that are made public accessible by the owner of the account.	5	Maximum of CDM and GS-VER	4	On the website the projects are structured by project -IDs and all the important informations are listed in order on one page. Structuring of the "issuance documents" is not as clear as at the CDM. Further documents are listed under "other documents" without labeling on the particular projectpages.
		Transparency projects	4. Level of content	The information given in the online projectregister should be complete, detailed and credible with names, authorities, signatures, telephone numbers etc.	15	15	On the CDM page of the UNFCCC, there are names of the auditors/DOE. Adresses and telephone numbers of the auditors are accessible for everyone. All the validating documents as well as the documents for verification of every issuance (inclusively monitoring reports, verification reports and emissionreduction calculations with the associated formulas and signed issuance request) are publicly accessible.	5	There are important informations missing, such as: Only one monitoring report was published and not all the reports from all the monitoring periods. Project number for easy finding of the project is not given.	15	Maximum of CDM and GS-VER	10	The Information is complete and the most important information for verification, validation, auditors etc. are given. Project-ID is, in contrary to GS given. But the proundness of content of CDM (e.g. tables with formulas for the calculation of the emissionreductions) will not be reached

Climate Integrity

Category	Value (total points, category)	Evaluation of the CDM					Evaluation of the GS			Evaluation of the CDM/GS			Evaluation of the VCS	
		Criteria	Indicator	atmosfair comments about indicators	Maximum	CDM atmosfair valuation	atmosfair comment	GS VER atmosfair valuation	atmosfair comment	GS CER atmosfair valuation	atmosfair comment	VCS atmosfair valuation	atmosfair comment	
Climate integrity	135	Permitted Project-technologies	5. Standard excludes certain harmful technologies		20	2	CDM is only excluding nuclear empowerment	20	There are legal requirements for hydropower, biomass. Exclusion of all fossiles (e.g. highering of efficiency Powerplant with fossile fuels)	20	Maximum of CDM and GS-VER	0	The VCS is not excluding any technologies.	
		Additionality (20)	6. Standard claims for the projects an audition of additionality		25	10	Different studies quote, that a lot the CDM projects are likely, if not very likely, not to be additional. The criteria is not good enough.	10	Uses additionality tool from CDM	10	Maximum of CDM and GS-VER	10	There can be projectmethods, performance methods and/or activitymethods applied, to decide about additionality. In that matter, it is referred to the additionality-tool which is developed by VCS and points at the CDM.	
		Calculation, monitoring, verification of emissions (30)	7. Approval procedures for methodologies, to apply these on the development of climate projects.		5	5	All existing CDM-methods can be used as model to develop new methods. CDM-methods are guiding principles for the emissionreductionprojects. The UNFCCC creates structure on the field of methodologies, which gives the projectmanager a better orientation. The UNFCCC offer with for example workshops a suitable environment to further develop the methodologies even in more complex areas.	5	The GS widens the spectre of methodologies by providing additional methodology to the CDM-methodologies, which is not only looking at the reduction of greenhousegases but also measures aspects of sustainability.	5	Maximum of CDM and GS-VER	5	All existing VCS, CDM and CAR methods can be used to develop new methods. A detailed instruction for developing an own method is given on the website.	
		8. Quality of projectaudits (scope and level)			20	15	The CDM-policy specifies, when a on-site visit has to happen and what kind of criteria have to be audited by the DOE. The auditors have a formal instruction (validation&verification standard) demanding them to collect data and information themselves to underpinn their audits. In practice this often leads to random sampling (e.g. unannounced knocking-on-doors to examine the ovens), taking measures of the oven themselves (just accumulations) or looking for other studies to verify his details in the report. A DOE confirmed us, that the CDM-audits are strictly following the policy and no deviations are tolerated by the UNFCCC. Each deviation can lead to the rejection of the request for issuance. The DOE also risks the loss of its accreditation.	5	Verification must, in general, be taking place once in a period of time of 5 years. GS micro-scale projects are often audited without on-site visit. Auditors have few space and motivation to fulfill the audit independently. The quality of the audit is suffering from the fact, that the DOE at the GS won't charged. All the responsibility lies in the hands of the project participant (PP). Moreover, this policy allows a little flexibility compared to the CDM. An Example: A deviation of the monitoring plan, which is part of the PDD, is accepted in the GS- Monitoring Report in comparison to the CDM. If necessary, the PP has to explain at the GS review why the deviation was carried out. A plausible explanation given, the GS will normally accept the procedure.	15	The scope of auditing limits to the additional use.	5	The level of project assessment is not defined and so subordinates to the VVBs. For example it is not clearly defined, if the validating and the verification of a project under the VCS needs a on-site visit oder how often a verification has to take place.	
		9. Audit of Leakage	Leakage causing a lot of bureaucracy effort. The methodologies specify how leakage should be handled in the calculations. For the sake of simplicity, in some methodologies it is granted to neglect smaller amounts of it.		5	5	To calculate leakages and to take them into account, is quoted in every methodology.	5	For pure GS-VER methods it is regulated just like in the CDM, with every method having their own leakage policy.	5	Maximum of CDM and GS-VER	5	VCS ist working with a generic approach, not methodolical specific; claims the inclusion and calculation of market leakage, activity shirting leakage and ecological leakage. A leakage sharing agreement makes the regulation take place. We can not say wether these methodologies are effective or not.	
		10. Validator's professional qualification			5	5	Lavish accreditation process, where the DOE has to prove ist qualifications.	4	GS automatically accepts DOEs accredited by UNFCCC. Lately the GS has established an own process, where validators (GS-VBs) can acquire an accreditation after verifying their qualification.	5	Maximum of CDM and GS-VER	5	An independent third party, called validation/ verification body (VVB), which has to be accredited, processes the validation and verification. They have to be licensed by CDM as a DOE or hold an accreditation through the international accreditation forum for ISO 14065	
		11. Validator's admission and re-accreditation			5	5	Every three years suspension can occur. There are DOEs, which are under surveillance of UNFCCC	1	Under GS-VER, DOEs are allowed to continue validate once they lost their admission as CDM-DOE. The GS-internal accreditation obliges GS-trainings with exams for a re-accreditation: Failing two times leads to suspension. The decision for re-accreditation is therefore not bound to the real working practice of the validators.	5	Maximum of CDM and GS-VER	0	VCS registry is examining the project documents handed in and the reports of VVBs, though there is no further examination on VVBs after the accreditation through the standard or own secretary. At least no process could be found.	
		Validator's independence (30)	12. Avoiding conflict of interest validation vs. Verification		5	5	Different DOEs are required for validation and verification	3	Projects under the micro-scale scheme are not running through an external validation and verification. Both tasks are held by the GS-secretary.	5	Maximum of CDM and GS-VER	0	Validation and verification can be processed by the same VVBs at the same time. VCS is authorizing testing organisations, which clearly show a conflict of interest to certificate projects. E.g. environment protection associations like the rainforest alliance are allowed to validate and verify forest projects or wind projects for consulting companies like RE Carbon Ltd. (formeris re-consult Ltd.). atmosfair is not considering this an independent examination.	
		13. Validator's liability			20	20	DOEs are liable for overissuances. Thus, TÜV has to run through intern verification through an intern quality assurance.	0	The DOE has to assume no liability under Gold Standard, the project participant (PP) hold the total liability. Under GS-VER, DOEs are allowed to continue examining projects, once they lost their CDM-DOE admission	20	Maximum of CDM and GS-VER	10	Validators have to conclude a liability insurance and share the liability for the documents handed in with the project participant.	
		Moment of issuance	14. Issuance of ex-post/ ex-ante		10	10	ex post	10	ex post	10	ex post	10	ex post	
		Double counting	15. Exclusion of double count in countries with reduction commitment (Annex-I-states, NDC)		10	10	Double count excluded, CDM projects are not accredited in Annex I-states	0	GS-projects can be performed globally	10	Maximum of CDM and GS-VER	0	Double count is not excluded, VCS projects can be established in Annex-B-states	
			16. Standard demands the project developer to register to a CO ₂ -register		5	5	Registration at DEHST necessary, official authority, examination of organisation's paperwork	3	Registration at Markit sufficient. Everybody can request access to Markit online. Only requirement: Uploading a photo of an identification document. Afterwards an account at Markit can be created.	5	Maximum of CDM and GS-VER	3	Intern VCS-register	

Sustainability

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Sustainability	45	Stakeholder involvement	17. Standard demands involvement of Stakeholder		20	20	Participation in registration in hospitable country (7 points), in Germany (3 points), objection possibility of Stakeholder on site (7 points), individual objection possibility globally (3 points)	10	No approval of german authority for hospitable country necessary compared to CDM, where the DNA (designated National Authority) has to hand in a letter of approval to establish the project. Considering the necessary local stakeholder consultation the register representatives, NGOs and private actors have to give feedback. Afterwards two more Stakeholder can give feedback and review the project documents for two more months.	20	Maximum of CDM and GS-VER	0	No approval of german authority for hospitable country is necessary compared to CDM, where the DNA (designated National Authority) has to hand in a letter of approval to establish a project. Paragraph 3.17.2 to 3.17.8 of the VCS guideline presents the involvement of stakeholders. The body of rules is going along with GS-rules. A local stakeholder consultation needs to take place before validation, but since the validation can be processed along with the verification, there is no inclusion of stakeholders before	
			18. Standard demands the consideration of biodiversity and human rights		10	0	Weak point of CDM	5	Is required, but not performed by independent validators	5	Maximum of CDM and GS-VER	3	Requires and assures the reduction of social and environmental influences. A complete consideration depends on the involvement of the CCB standard.	
		Nachhaltige Entwicklung Sustainable development	19. Standard can be described as dynamic		5	5	EB annually reports to COP, receives guidance for solution of problems and further development	5	GS was developed not only regarding emission reduction issues but to furtherly take other sustainable aspects rooted withing Kyoto protocol into account, like social development and technology transfer. Constructive critics turned into an alternative version. The further development towards GS for Global Goals changed the GS and anticipated possible scenarios for further embodiment of the Partis climate contract towards occupying new market nicehs.	5	Maximum of CDM and GS-VER	3	Since the VCS rather embodies other standards than developing its own, the development is depending a lot on the standards authorized by VCS.	
			20. Standard demands consideration of SDGs		10	0	Contribution to SDG is not required	10	Contribution to SDG 13 and two other goals need to be demonstrated	10	Maximum of CDM and GS-VER	0	Sustainable development verified impact standard is in developing phase. However it is supposed to expand the VCS and CCB and follows the ISEAL Code of Good Practice for setting social and environmental standards. Not yet applicable though, zero points	

Governance							Evaluation of the CDM		Evaluation of the GS		Evaluation of the CDM/GS		Evaluation of the VCS	
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Governance	55	Governance, Checks&Balance	21. Leitung und Aufsicht administration and supervision		25	25	COP as democratic supervision for EB (parity cast by IL and EL). EB has to hand in reports to COP annually.	10	Private swiss foundation	25	Maximum of CDM and GS-VER	10	VCS is led by own board and has different advisory committees. There is no superior supervisory body to control and approve the board's chores. A conflict of interest between the board and their own projects/ project operators can possibly occur. The board of directors consists of actors and private individuals, who are also working and operating for other companies related to the CO2 market. Regarding their own interests, they are leading the VCS program. In comparison: UNFCC represents the uppermost authority to supervise and examine the executive board's chores of CDM.	
			22. Neutrality (formal vs. Informal)		15	15	Strict observance of rules, no informal negotiations of project developers with UNFCC. Secretary and EB can raise objection against issuance request. In case of occurrence, the whole process will be cancelled and a new request with updated documents can start	10	No strict interpretation or rules, bilateral reconciliations. If deviations occur, the issue will be discussed between the GS and the project participants and the person in charge can state a justification	15	Maximum of CDM and GS-VER	?	No further information available	
			23. Grievance mechanism	Is it possible to direct a complaint to the supervising body, which is independant from the management? Who decides about the Grievance and how?	15	15	Every citizen can direct a complaint to his government or the UNFCCC and will get an answer of the EB. There is a own, publicly accessible CDM guideline for stakeholder complaints.	10	There is the possibility for grievance but the most is being dealt with GS internally. Only recently (a couple of days) the GS decided to make use of a third party in the last phase before the Board decides.	15	Maximum of CDM and GS-VER	5	Complaints can be handed to the VCS. This is defined in the guideline for registration and issuance process. Without reading this guideline, the procedure of the complaint can not be understood. How the Grievance process should take place further on, can therefore not be told.	