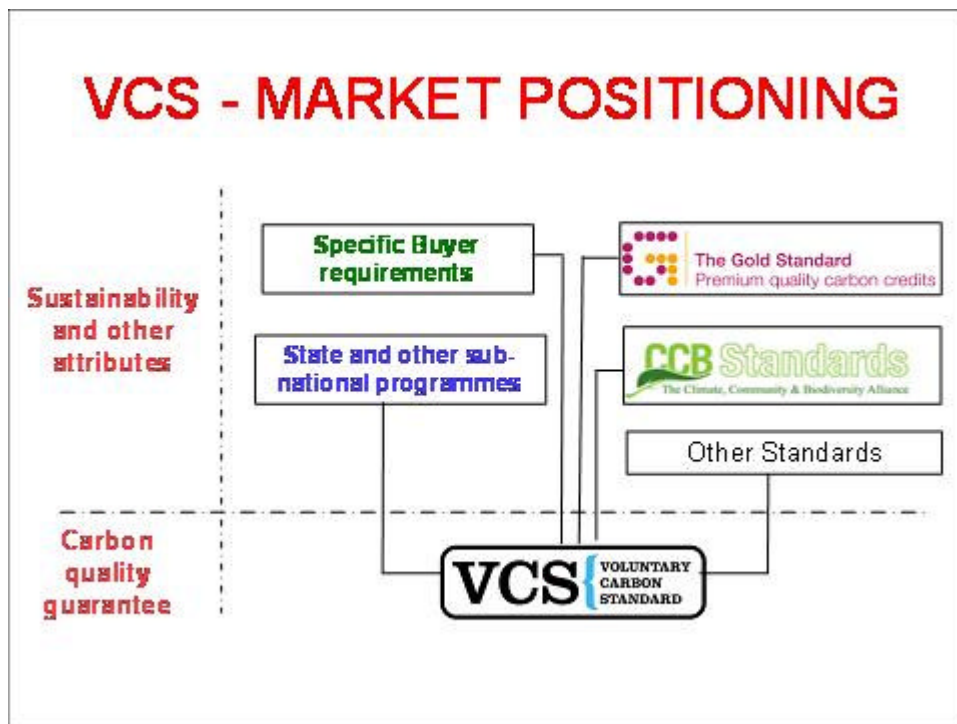




## General

WWF misses the point in their criticism of the Voluntary Carbon Standard (VCS) (release on 20/11/07). Climate change requires a significant effort across all sectors of the economy to prime the pump for new green technologies. Voluntary offsets can be an important stimulus if designed correctly and support policy development to cut emissions. Prior to the launch of the VCS, there has been no offset standard which covers all possible mitigation projects that has balanced environmental rigor and technology innovation – this is the value of the VCS.

The VCS has been designed to complement existing “niche standards” and from the outset was designed not to compete with but rather support other credible approaches. It is fully recognized that some buyers will wish to stipulate additional requirements while using the VCS as their basic guarantee of offset quality, in other words that they are buying a tonne of real, permanent, additional and independently verified emission reduction. The diagram below illustrates the role of the VCS in the voluntary carbon market.



## **Responses to specific comments by WWF**

### Negative Environmental & Social Impacts

The VCS like all regulated GHG Protocols/Standards, such as the Clean Development Mechanism and Joint Implementation, require all projects to demonstrate conformity with all local legislation addressing its social and environmental impacts.

### Additionality

The VCS uses three additionality tests that are all equivalent in quality. The first test is equal in rigor to the CDM additionality tool and is based on exactly the same conditions – namely, demonstrating that the project is beyond regulation, is not common practice and faces a barrier that prevents implementation of the project. VCS additionality tests two and three are under development, but will be equal in rigor to test 1 and subject to the double approval process prescribed by the VCS standard.

### “Loose validation and verification protocols”

The VCS verification standards and accreditation process are based on ISO GHG standards. Verifiers must be accredited against ISO 14065 by an International Accreditation Forum Accreditation Body or accredited under the CDM or JI. This ensures that project developers are scrutinized against the highest standards, by the highest qualified validators and verifiers. In fact, the VCS is the only GHG program that has received approval from the Central ISO Secretariat to use copyright text from the ISO verification standards.

### Transparency and stakeholder consultation

All VCS approved project validation, verification reports and project descriptions will be made publicly available on the VCS central project database and this database will be available shortly on the VCS website. The VCS requires as a minimum, that the project description must include the baseline calculations, demonstration of additionality and monitoring plan and a stakeholder consultation in line with the ISO14064-2 clause 5.2.

All parts of the VCS will be regularly reviewed to ensure the standard remains robust and stakeholder comments will provide a critical input into this process. Indeed, at launch we stated that there will be a full review of all aspects after one year of operations. As with the consultation that led to the creation of the VCS, we will invite WWF and all other interested stakeholders to provide inputs into this review.

Edwin Aalders.

Acting CEO VCS Association

e-mail:aalders@v-c-s.org