



# Stakeholder Engagement Requirements

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## Introduction

Being an important requirement of several carbon credit accreditation schemes, including ICROA and The Integrity Council for the Voluntary Carbon Market (IC-VCM), Stakeholder Engagement plays a noteworthy role in ensuring high-quality of carbon credits. Therefore, the purpose of this Puro Standard Requirement is to lay foundational rules for Stakeholder Engagement in Puro.earth's activities as a carbon crediting program.

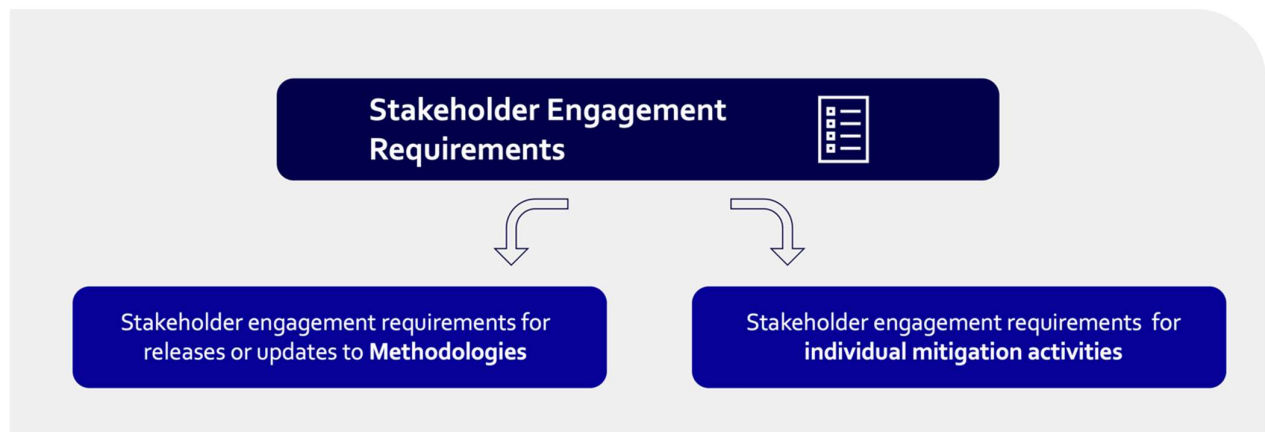
Stakeholder Engagement in Puro Standard is subdivided into two categories:

1) Section 1: **Stakeholder Engagement in Methodology development of Puro Standard**

and

2) Section 2: **Stakeholder Engagement in Individual Mitigation Activities**

The document is structured according to these two broader categories. The first section defines the requirements for Stakeholder Engagement in material updates to Puro Standard Methodologies. The second section of this document lays out the requirements for Stakeholder Engagement in individual mitigation activities, which are rules that CO<sub>2</sub> Removal Suppliers shall comply with. Thus, we recommend potential as well as active CO<sub>2</sub> Removal Suppliers to thoroughly study the second part of this document.



## Definitions

**CO<sub>2</sub> Removal Supplier** – - An Account Holder registering a Production Facility capable of CO<sub>2</sub> Removal according to the applicable Methodology. An Account Holder can be such as but not limited to project owner, project developer, project participant, facility owner, facility operator. A CO<sub>2</sub> Removal Supplier represents the mitigation activity participants needed to perform the CO<sub>2</sub> Removal end to end.

**General Rules** – Highest-ranked document under the Puro Standard, defining the roles and responsibilities of different actors in the program and facilitating assessment of contractual compliance. The aim of these rules is to protect the rights of Account Holders of the System and to guarantee equal treatment.

**Issuing Body** – The Body responsible for Issuing CORCs, operating the System and overseeing the reliability of the System. The Issuing Body of the System is Puro.earth Oy.

**Methodology** – Methodology provides eligibility requirements to verify the compliance of the CO<sub>2</sub> Removal activity. A Methodology provides robust CO<sub>2</sub> Removal quantification rules specific to each carbon removal pathway. It specifies the activity boundaries, detailed calculation formulas and the proof needed for the activity performance. A Methodology may be revised. A List of the valid Methodologies is available on the Puro.earth website.

**Output Report** – The CO<sub>2</sub> Removal Supplier reports the mitigation activity performance and Output of a Production Facility periodically to the Issuing Body by submitting an Output Report. An Output Report can be generated manually or automatically.

**Production Facility Audit** – Audit performed by a 3rd party to validate the eligibility of a Production Facility according to the relevant Methodology.

**Production Facility Registration** – Production facility registration is initiated by the CO<sub>2</sub> Removal Supplier by filling in production facility details in the Production Facility Registration Form. Once all information is recorded, the CO<sub>2</sub> Removal Supplier submits the production facility for registration by the Issuing Body.

**Puro Standard** – Standard defining the rules for the System, the eligibility requirements for CO<sub>2</sub> Removal Suppliers and quantification rules for the number of CORCs to be issued.

**Stakeholder** – Any individual or group interested in or directly impacted by the Puro standard or mitigation activity.

**Stakeholder Engagement** – The public stakeholder consultation process as well as ongoing public feedback implemented to ensure public stakeholder engagement in introductions or updates of Methodologies of the Puro Standard and in the design of individual mitigation activities by CO<sub>2</sub> Removal Suppliers

**Registry** – is the system which tracks issuances, transfers, and retirements of CORCs

## Verbal forms for expressions of provisions

**“Shall”** specifies a requirement;

**“Shall not”** specifies an act that is prohibited;

**“Should”** specifies a recommendation;

**“May”** specifies a permission;

**“Can”** specifies a possibility or a capability.

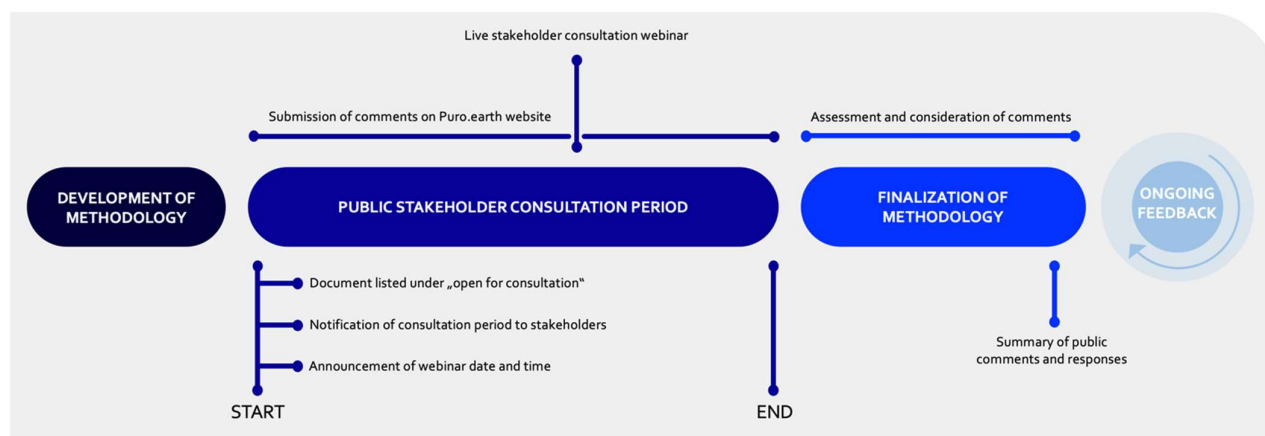
## Section 1: Stakeholder Engagement in Puro.earth Carbon Crediting Program Development

### 1.2 Stakeholder Engagement in Puro Standard development

- 1.2.1 The objective of Stakeholder Engagement is to inform and to give Stakeholders a meaningful way of participating in the process of Methodology formulation, to draw the benefits that come from including a range of diverse viewpoints, and to identify key Stakeholders in the design and improvement of Puro Standard Methodologies.
- 1.2.2 Stakeholder Engagement shall be conducted if Puro Standard makes material updates to or releases new Methodologies.
- 1.2.3 Stakeholder Engagement shall be implemented through an online public Stakeholder consultation period, during which Stakeholders may submit feedback.
- 1.2.4 Feedback can be submitted through a comment questionnaire, direct message on Puro.earth website, or in a consultation webinar.

### 1.3 Timing and documentation

- 1.3.1 Any public Stakeholder consultation period shall take place during the last stages of the development of a Methodology or of a materially updated version of an existing Methodology.
- 1.3.2 A duration of 21 days per consultation shall be the minimum in any case.
- 1.3.3 During the public Stakeholder consultation period, the experts involved in the development of the respective Methodology shall hold a Stakeholder consultation webinar. The webinar shall be announced via Puro.earth's key communication channels and anyone shall be able to participate in it upon registration.
- 1.3.4 The webinar shall be recorded and uploaded on the Puro.earth website along with the webinar slides and names of all panelists involved.
- 1.3.5 After the public Stakeholder Engagement period has ended, the Puro Standard shall formally address and, if relevant, incorporate the gathered feedback in the edits of its respective Methodology. This shall be documented in a summary of consultation outcomes, which shall be uploaded on the Puro.earth website within a reasonable time.
- 1.3.6 The Puro Standard may summarize the content of several comments but shall ensure that all written feedback received is documented reflecting its true content, without deliberate or undeliberate distortion of its meaning.



## 1.4 Stakeholder invitation

- 1.4.1 In advance of the launch of a Stakeholder consultation period on any Methodology and at the latest when the period begins, Puro.earth shall ensure that Stakeholders are notified. For this, Puro.earth shall use its notification system, consisting of its key communication channels, to publicly announce Stakeholder Engagement. By subscribing to one of these channels, Stakeholders will automatically receive notifications about the launch of any new Stakeholder consultation periods on Methodologies.
- 1.4.2 The notification shall include a direct link to or a description of how to access the written comment section on Puro.earth's website as well as a mention of the date and time the live Stakeholder consultation webinar will take place with a registration link.

## 1.5 Information to be shared with Stakeholders

- 1.5.1 Information shall be provided in Puro Standard's *document library* under *open consultations* at the beginning of each Stakeholder consultation period in two forms:
- A PDF draft document, representing the most current state of development of the respective Methodology;
  - In case a Methodology is updated, a summary of changes, shortly describing the main alterations compared to the previous version and written in understandable language, allowing anyone to comprehend its content.

## 1.6 Ongoing feedback and grievance mechanism

- 1.6.1 Stakeholders shall be given the opportunity to leave continuous feedback by sending an email to [contact@puro.earth](mailto:contact@puro.earth) after the end of the Stakeholder consultation and the coming into effect of the respective Methodology.
- 1.6.2 Stakeholders may either provide their name, organization, or contact email address, or decide to stay anonymous.
- 1.6.3 The Puro Standard shall duly consider this feedback and, if not received anonymously, provide a satisfactory answer within a reasonable time. Continuous feedback from Stakeholders may initiate a revision of an existing Methodology.

## 1.7 Inclusivity

- 1.7.1 Puro.earth shall ensure that Stakeholders who desire to participate are not excluded from Stakeholder Engagement and that the relevant website sections and the webinar are open to anyone interested in participating.
- 1.7.2 As a global carbon crediting program, Puro.earth is aware that its Stakeholders are not a homogenous but diverse community of individuals and organizations. To respect the range of different backgrounds of Stakeholders and further build on the benefits of Stakeholder diversity, Stakeholder Engagement shall take place in an appropriate tone of conversation. Particularly during the webinar, Puro.earth shall ensure that inappropriate or discriminatory statements do not occur.
- 1.7.3 In case any Stakeholders have expressed their interest in participating in the public Stakeholder consultation period but cannot take part due to disadvantageous circumstances, they shall at a minimum be given the chance to participate by:
  - a) receiving the summary of changes or, in the case of a new Methodology, a summarized version of the draft in an appropriate form, e.g., as a letter;
  - b) being allowed to submit an answer in an appropriate form, e.g., by telephone or letter.

The Puro Standard shall ensure that these comments are equally considered and addressed in the summary of outcomes.



## Section 2: Stakeholder Engagement in Individual Mitigation Activities

### 2.1 Stakeholder Engagement in Individual Mitigation Activities

- 2.1.1 Stakeholder Engagement shall be conducted if a CO<sub>2</sub> Removal Supplier seeks approval for a new Production Facility under the Puro Standard or if it makes any substantial changes to the design of its mitigation activity.
- 2.1.2 In case a public consultation was conducted before an application for the approval under the Puro Standard, e.g., due to requirements of local authorities, the CO<sub>2</sub> Removal Supplier can possibly not be obliged to conduct a consultation as outlined in clause 2.1.5. The following information shall be submitted to the Issuing Body:
- a) A description of how Stakeholders were identified and invited;
  - b) The information Stakeholders were provided with;
  - c) A description of the means of conducting the consultation;
  - d) A summary of the issues raised during the consultation;
  - e) A description of how feedback from the consultation was considered and how issues were resolved.
- The Issuing Body will assess the information provided to make a project-specific adjustment on whether the extent of previous Stakeholder Engagement is sufficient.
- 2.1.3 If previous Stakeholder Engagement was considered sufficient, the CO<sub>2</sub> Removal Supplier shall not be obliged to conduct a consultation as described in the course of this document. The information will be summarized in the [stakeholder engagement report](#) template, which will be published along with other project documents in the Puro Registry. The CO<sub>2</sub> Removal Supplier is still required to give stakeholders the opportunity to submit continuous feedback on the CO<sub>2</sub> Removal Supplier's activity as described in Chapter 2.5 of this document.
- 2.1.4 Existing stakeholder consultations or the status quo may be deemed sufficient if the CO<sub>2</sub> Removal activity does not alter the impacts or risks to stakeholders. This may be the case when the CO<sub>2</sub> Removal is retrofitted to an existing industrial operation and site, no new permits or licenses are required, and the impacts to air, water, biodiversity and local communities are not increasing from the previous situation. In such a case, the requirement for a new Stakeholder Consultation is not applicable and the Production Facility does not have to conduct a stakeholder consultation. However, the CO<sub>2</sub> Removal Supplier is still required to give stakeholders the opportunity to submit continuous feedback on the CO<sub>2</sub> Removal Supplier's activity as described in Chapter 2.5 of this document.
- 2.1.5 In case the CO<sub>2</sub> Removal Supplier has not conducted sufficient Stakeholder Engagement prior to the application for approval under the Puro Standard, Stakeholder Engagement shall be conducted by independently organizing and hosting a public Stakeholder consultation in an appropriate format commonly used in the local community.
- 2.1.6 When the activity directly or indirectly impacts indigenous peoples or their livelihoods, ancestral knowledge or cultural heritage, the CO<sub>2</sub> Removal Supplier shall develop the Production Facility with free, prior, informed consent (FPIC). FPIC is distinct from stakeholder engagement in that it is derived from indigenous peoples' right to self-determination. While stakeholder engagement involves consultation and collaboration with all parties affected by a project, FPIC goes a step further by requiring the explicit consent of indigenous peoples before proceeding with activities that impact them. The CO<sub>2</sub> Removal Supplier must ensure

that both stakeholder engagement and FPIC are appropriately addressed in the development of the Production Facility.

## 2.2 Timing and documentation

- 2.2.1 Stakeholder Engagement shall take place after the Issuing Body has approved the Production Facility Registration and before the beginning of the Production Facility Audit.
- 2.2.2 The Stakeholder Engagement period shall have a minimum length of 14 days.
- 2.2.3 After the Stakeholder Engagement period has ended, the CO<sub>2</sub> Removal Supplier shall consolidate and address all comments made in this [stakeholder engagement report](#). The CO<sub>2</sub> Removal Supplier should read the report before conducting Stakeholder Engagement to ensure it knows which data must be collected.
- 2.2.4 The CO<sub>2</sub> Removal Supplier shall submit the [stakeholder engagement report](#) to the Issuing Body prior to the initiation of the Production Facility Audit.
- 2.2.5 The CO<sub>2</sub> Removal Supplier shall ensure that all comments received are documented reflecting their true content, without deliberate or undeliberate distortion of its meaning. This particularly applies to non-written types of Stakeholder Engagement, where comments need to be transformed from spoken words into text.
- 2.2.6 Based on the [stakeholder engagement report](#) and other evidence provided, the Issuing Body will determine whether the CO<sub>2</sub> Removal Supplier has sufficiently addressed feedback.
- 2.2.7 The [stakeholder engagement report](#) will form a part of the project description and will be published after a Production Facility Review, as defined in the General Rules clause 2.2.5.5.

## 2.3 Stakeholder invitation

- 2.3.1 The CO<sub>2</sub> Removal Supplier shall identify and invite the following Stakeholders, including, but not limited to:
  - a) Local Stakeholders, that is, Stakeholders in the immediate environment of the facility of the CO<sub>2</sub> Removal Supplier, and most prone to experience direct or indirect effects of the respective carbon removal activity;
  - b) Stakeholders with land-tenure rights within the vicinity of the project boundary;
  - c) Relevant local politicians and representatives of relevant local authorities;
  - d) Local non-governmental organizations (NGOs) or international NGOs who are active in the region and relevant to the topic;
  - e) Representatives of relevant working groups of vulnerable and marginalized groups within the vicinity of the project boundary;
  - f) Relevant industry experts, given there are any in the near environment.
- 2.3.2 The invitation of the identified Stakeholders shall take place within a reasonable time prior to the start date of the Stakeholder consultation.
- 2.3.3 The CO<sub>2</sub> Removal Supplier shall find a suitable way of providing all identified Stakeholders with an invitation. In particular, this involves the consideration of Stakeholders without access to the internet or a mobile device.

- 2.3.4 The invitation shall include an address under which the CO<sub>2</sub> Removal Supplier can be contacted by post as well as a valid phone number.
- 2.3.5 The CO<sub>2</sub> Removal Supplier shall provide evidence of the invitations by providing a sample invitation in the [stakeholder engagement report](#).
- 2.3.6 In case any relevant Stakeholders that fall under the categories listed in clause 2.3.1 were not invited to participate, the CO<sub>2</sub> Removal Supplier shall provide justification.

## 2.4 Information to be shared with Stakeholders

- 2.4.1 Stakeholders shall be provided with general, non-technical information on the mitigation project to help them comprehend the design, implementation plan, and planned operation of the mitigation activity. This project description shall be accompanied by a detailed, understandable description of how the environmental, economic, and social effects - both potentially positive and negative - of the mitigation activity might affect their rights, interests, and traditional livelihoods.
- 2.4.2 It might happen that the CO<sub>2</sub> Removal Supplier has identified important Stakeholders that fall under the categories listed in clause 2.3.1 but are not able to have access to the information provided on the website, e.g., disabled individuals or some indigenous peoples. In such cases, it is the responsibility of the CO<sub>2</sub> Removal Supplier to ensure a custom solution allowing anyone to comprehend the information listed in clause 2.4.1.

## 2.5 Ongoing feedback and grievance mechanism

- 2.5.1 After the public comment period has ended and the mitigation activity becomes active under the Puro Standard, Stakeholders shall be given the opportunity to submit continuous feedback on the CO<sub>2</sub> Removal Supplier's activity. The CO<sub>2</sub> Removal Supplier shall therefore provide a means of contact to the public (e.g., e-mail address, phone number, letterbox).
- 2.5.2 This ongoing feedback and grievance mechanism shall be culturally appropriate and ensure at least that all relevant Stakeholders as listed in clause 2.3.1 have access while allowing for anonymous feedback.
- 2.5.3 The CO<sub>2</sub> Removal Supplier shall duly consider and satisfactorily respond to received ongoing feedback within a reasonable response time.
- 2.5.4 The CO<sub>2</sub> Removal Supplier shall document any ongoing feedback-based exchange with Stakeholders in its Output Report for the respective monitoring period.
- 2.5.5 The CO<sub>2</sub> Removal Supplier shall show frankness and readiness to address feedback not only in words but to initiate potential revisions to its project design, implementation, or operation. It is especially important that local and indigenous knowledge receives attention and becomes utilized.
- 2.5.6 The CO<sub>2</sub> Removal Supplier shall provide justifications in case any feedback has not been incorporated or reacted to. Unjustified withholding of received feedback in the Output Report can result in the deregistration of the CO<sub>2</sub> Removal Supplier from the Puro Registry.

## 2.6 Inclusivity

- 2.6.1 Stakeholder Engagement shall be open to anyone interested in participating. The CO<sub>2</sub> Removal Supplier shall ensure that Stakeholders listed in clause 2.3.1 who express interest in or would likely want to participate in the Stakeholder consultation are not excluded.
- 2.6.2 Each form of consultation shall take place in an appropriate tone of conversation. If not, the host of the conversation shall put in place a mechanism that eliminates and not further allows for inappropriate or discriminatory statements.
- 2.6.3 The CO<sub>2</sub> Removal Supplier shall, in particular, encourage and solicit feedback from socially vulnerable and marginalized groups, such as girls and women, indigenous peoples, ethnic and cultural minorities, disabled people, migrants, members of the LGBTQ+ community, and refugees.
- 2.6.4 If any interested Stakeholders listed in clause 2.3.1 were identified but cannot take part in the selected means of Stakeholder Engagement due to disadvantageous circumstances, they must at minimum be offered the possibility to take part in Stakeholder Engagement by:
- a) receiving information as described in clause 2.4.1 and 2.4.2 in an appropriate form;
  - b) being allowed to submit an answer in an appropriate form, e.g., by telephone or letter.
- In such cases, the CO<sub>2</sub> Removal Supplier shall ensure that those comments are as well and equally considered and addressed in the [stakeholder engagement report](#).
- 2.6.5 If indigenous peoples have been identified as Stakeholders as listed in clause 2.3.1 and are deprived of internet or mobile access, the CO<sub>2</sub> Removal Supplier shall not only follow clause 2.6.4 but furthermore explicitly ask whether they wish to conduct a physical meeting to discuss the mitigation activity and if so, document the outcomes in the [stakeholder engagement report](#).
- 2.6.6 Puro.earth does not tolerate discrimination. Thus, the CO<sub>2</sub> Removal Supplier shall acknowledge that communities are not homogenous but diverse groups of individuals whose interests must be given equal attention, no matter their age, sex, gender, origin, race, ethnicity, religion, culture, language, political belief, identity, sexual orientation, or abilities. This involves every step of Stakeholder Engagement.

## Version History

Approval Date	Version	Notes
16.12.2022	1.0	
13.05.2024	1.1	<ul style="list-style-type: none"><li>• Clause numbering changed to include section number.</li><li>• Definitions and terminology aligned with General Rules 4.0.</li><li>• Following clauses were added:<ul style="list-style-type: none"><li>○ 2.1.4 on the case when carbon removal has no effect on impacts or risks,</li><li>○ 2.1.6 on FPIC requirement, and</li><li>○ 2.2.7 on stakeholder engagement report forming a part of the project description.</li></ul></li><li>• 2.2.2 was changed from maximum length to minimum length.</li></ul>